



LONDON FIRE BRIGADE

People Services restructure – Phase One

Report to:

Date:

Commissioner's Board
Deputy Mayor's Fire and Resilience Board
London Fire Commissioner

23 August 2023
08 September 2023

Report by:

Cliff Morton – Interim Chief HR Officer

Report classification:

For decision

Not for publication

Confidential facts and advice

People Services Restructure – Phase One

Information may have to be disclosed in the event of a request under the Freedom of Information Act 2000. In the event of a request for confidential facts and advice, please consult the Governance Team for advice.

This information is not for publication because:

The content of this report is sensitive due to the anticipated consultation process that will be required. To protect the confidentiality and integrity of the consultation process, decisions need to be made in isolation to that process. This will allow for a transparent and meaningful process to take place without prejudice and predetermined outcomes. Access to the information contained in this report needs to be strictly controlled. The risks associated with this information reaching the people in scope of the consultation process prior to implementation includes potential identity of individual posts and therefore individuals, reluctance to engage,

deterioration of mental health and wellbeing, and reputational damage for poorly managing a legally required process.

The report also includes information about the procurement of an external service for staff complaints and the value attached to that and so there is a risk to the LFC commercial interests and the procurement exercise if the estimated cost is disclosed.

Legal recommendation on the grounds of keeping the information confidential:

In the event the information contained in this report is the subject of a request for information under section 1 of the Freedom of Information Act 2000 (the “Act”), it is considered that access can be denied in respect of the procurement information on the basis that such information constitutes exempt information under: Section 43(2) – Commercial Interests – this exempts information whose disclosure would, or would be likely to, prejudice the commercial interests of any legal person (an individual, a company, the public authority itself or any other legal entity)

The information in this report is also exempt under the FOIA under Section 40 of FOIA on the basis that it contains personal data as defined in the Data Protection Act 1998.

Legal Adviser

I make the above recommendations that this information should be considered confidential at this time.

Name: Kathryn Robinson, General Counsel	Date: 21/08/2023
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Confidential decision and/or advice

Executive Summary

This paper sets out proposals to improve the structure and function of LFB’s People Services directorate, addressing the challenges set by the Independent Culture Review, the Independent Review of People Services and His Majesty’s Inspectorate

of Constabulary and Fire & Rescue Services (HMICFRS) spotlight report on Values and Culture.

The proposals recognise the pivotal role that People Services play in determining and sustaining the Brigade's culture and the step change that is required for it to do so effectively.

Changes are proposed in three phases. The first phase is fully scoped and set out herein, delivering a new Professional Standards Unit (supported by an external service for complex cases), improved first line and business partner support and new, consolidated teams that build expertise and raise service levels. This phase uses existing resources more effectively rather than offering savings, with some transition costs. Phase two is targeted to achieve c. £300,000 savings and will be scoped and implemented later in 2023, once the first phase is complete. Phase three will focus on the implementation of the new HR system, iTrent, and will allow for efficiency savings in the service desk environment and further rationalisation of the HR operational structure.

Overall, the proposals require a one-off investment of £2,000,000 from LFB's budget flexibility reserves to cover change costs (redundancy and extended external support) and will deliver net savings of c. £260,000 annually from 2024/25 onwards.

Recommended decisions

For the London Fire Commissioner

- Approves the proposed Directorate structure set out in this report, subject to consultation with trade unions and staff, as shown in Appendix 1.
- Delegates authority to the Interim Chief HR Officer to make minor amendments to the Directorate structure where appropriate following consultation.
- Agrees a revised service delivery CMP contract to run from October until December 2023 at an anticipated maximum cost of £150,000. The cost will depend on the number of cases delivered in total. Therefore, zero cases delivered will result in no costs incurred. This represents a contingency for an unexpected surge in cases through the transition.
- Approves the proposed approach to the transition from CMP to a new model for external investigations via a tendered procurement process for an enduring service provision and the associated total expenditure of £250,000 on a new external investigation provision. The expenditure will be for a 3-year

contract, which allows for 7 cases to be managed each year over the course of the contract.

- This external service provision will work concurrently with the in-house Professional Standards Unit (PSU).
- Approves expenditure of £20,000 on an external outplacement support for displaced staff.
- Notes the costs of potential redundancies, to be calculated when more information is available. An early Impact Assessment gives an estimated cost of around £1,300,000 at the top end. The bottom end cost is estimated at around £800,000. Until there is confirmation of which staff members are at risk of redundancy, the estimated cost window will remain broad. This does not include any early release of pensions benefits, as this is unique to the individual circumstances and cannot be calculated until individuals are identified.
- Approves the training costs of the in-house PSU. Estimated currently at £23,100 + VAT. This will cover 24 delegates.
- Approves legal costs of £10,000 for advice on the implementation of this decision.
- Approves contingency of £246,900 [balancing figure in table below].

Table of costs:

ITEM	COST
CMP – TO COVER THE COST OF UP TO 10 CASES BEING REFERRED TO THEM.	£150,000
EXTERNAL SERVICE PROVIDER TO BE PROCURED. TOTAL COST OF CONTRACT (7 CASES PER YEAR, FOR 3 YEARS)	£250,000
TRAINING COST TO STAND-UP PSU	£23,100
TOP END OF POTENTIAL REDUNDANCIES COST, EXCLUDING PENSIONS COST.	£1,300,000
EXTERNAL OUTPLACEMENT SUPPORT	£20,000
LEGAL COSTS FOR IMPLEMENTATION	£10,000
CONTINGENCY	£246,900
TOTAL	£2,000,000

1. Introduction and background

- 1.1 In March 2021, the London Fire Commissioner initiated an independent review of LFB culture. Nazir Afzal was appointed to conduct this, and his final report was published in November 2022.
- 1.2 In his review, Mr Afzal found that LFB, at its best, is a beacon of distinguished service, selflessness, and bravery. However, he also found evidence of institutional racism and misogyny, as well as poor treatment of the disabled and neurodiverse. The review acknowledges the central role that HR plays in determining organisational culture and describes the LFB People Services department as non-strategic and disconnected, inefficient, ineffective and slow.
- 1.3 The Culture Review made 23 recommendations overall, including a recommendation for a more detailed independent review of People Services by an HR specialist.
- 1.4 On publication, the LFC announced that all complaints relating to discrimination, harassment or bullying would be handed to an external complaints service (CMP), to assure staff that their complaints would be handled independently and fairly, whilst improvements to LFB's own functions were made. The contract for this service terminates in September.
- 1.5 Shortly after the publication of the Review, LFB was put into enhanced monitoring by HMICFRS, on the basis of its culture, and is now subject to regular scrutiny on progress against the action plan produced to meet both the HMICFRS and Culture Review recommendations, including the review and improvement of People Services.
- 1.6 In January 2023, Dr Jenny Simnett conducted the independent review of People Services and made a series of recommendations, including a new People Strategy, and revisions to the structure so that work is organised coherently, people's roles are clear and the HR service to the Brigade improves.
- 1.7 In April 2023, the HMICFRS released a Values and Culture spotlight report, considering findings from their inspections across the sector, and making recommendations for all Fire and Rescue Services (FRS) to consider and adopt. These include the provision of a confidential reporting service for staff; the consideration of a Professional Standards function; increased background checks and the need to meet the National Fire Chief Council standards for managing people.

- 1.8 The recommendations from all these reviews will be addressed in two ways: first, a proposed structural change to transform People Services into a customer-focused, high-value enabling function that will underpin a safe and professional working culture across LFB. Next, a new People Strategy will be presented in the autumn, which will set out the priorities and plans for the improved function.

2.0 Proposed structure of People Services

- 2.1 These proposals are designed to address the specific concerns and recommendations made in the various reviews, namely to:

- Create a new Professional Standards Unit in order to set, monitor and uphold appropriate standards, and manage the increased vetting workload;
- Provide short-term cover between the conclusion of the current CMP contract in September and the establishment of the new PSU;
- Consolidate the organisation of work within functional teams, with clear roles and responsibilities and an enhanced business partner service; and
- Raise the standard of the service overall, through specialist, expert roles supported by improved policies and enhanced systems and processes.

- 2.2 The detail of the proposed new structure is included at Appendix 1 and comprises seven teams:

a) Professional Standards Unit

- ⇒ Setting, monitoring and upholding Professional Standards
- ⇒ Confidential reporting for staff
- ⇒ Vetting of new and current staff

b) Service Excellence

- ⇒ Merging the HR Help Desk and HR Service team to provide a consolidated, generalist service to staff and managers
- ⇒ Locating this alongside the HR Policy, Reward and Industrial Relations team to ensure queries are solved or redirected to resolution at first point of contact
- ⇒ Rationalising and improving HR policies and preparing for increased self-service

c) HR Operations

- ⇒ A refocused approach to HR Operations, consolidating recruitment and resourcing activity to support fast, effective vacancy filling across LFB

- d) Business Partnering
 - ⇒ An expanded business partnership provision under single leadership
 - ⇒ New Employee Insight and Advice Manager posts, to provide early intervention support for issues and concerns
- e) Business Manager
 - ⇒ Delivering robust business support, including workforce planning
- f) Psychological Health & Counselling
 - ⇒ Continuing the support to all members of staff
- g) Organisation Development
 - ⇒ Continuing the delivery of specific development needs

2.3 The proposed structure offers a ratio of operational HR staff of 1:93, which is within sector best practice margins.

2.4 Alongside the internal Professional Standards Unit, it is proposed to procure an external provider on an ongoing, call off basis, to manage concerns, investigation and HR casework that are more complex, contentious or relating to senior staff, and to provide assurance and resilience to the work of the PSU. The external service will also provide a first point of contact for any member of LFB staff that wishes to use this service to raise concerns or initiate a complaint, rather than using internal LFB channels.

3.0 Managing/phasing the change

3.1 Given that the changes impact the People Services function, who ordinarily provide the support for such change, it will be delivered in two phases.

3.2 The first phase, starting immediately, would include teams listed at a) to e) in the section above. This will allow for the set-up of the Professional Standards Unit as the CMP contract concludes, and the reorganisation of existing staff into new teams. This phase makes better use of existing resources, rather than offering savings.

3.3 The largest impact will be on the Employee Relations team, which will divide between the PSU and Business Partnership teams, with fewer numbers overall. This will necessitate full consultation and potentially place staff at risk of redundancy.

3.4 Given the scale of the disruption to the ER team in Phase 1, it is proposed to

extend the current CMP contract for a further three months (1 October 2023 to 31 December 2023) to allow for vital, continuing complaints handling until the restructure and training phase is complete. Alongside this, CMP will conclude the 50 active cases they currently hold; work that is already funded.

- 3.5 Once Phase 1 is complete, Organisational Development would then be reviewed and restructured later in the year, with the benefit of an in-place People Services function to support the change. There is a target of c. £300,000 of savings in this second phase.
- 3.6 A third phase of rationalisation and improvement will involve the implementation of the new HR system, iTrent and will allow for efficiency savings in the service desk environment and further rationalisation of the HR operational structure. This will be scoped and planned once the system implementation is complete.
- 3.7 People Services department currently has an interim leadership team in place, which is expected to remain in place to oversee the People Service transformation before permanent appointments are made under the proposed new structure. The interim leadership team consists of the Interim Chief HR Officer, the Head of HR Service Excellence, and the Head of People Operations.

4. Timeline of Activity

- 4.1 Subject to approval of the proposals, consultation with people in scope will begin in mid-September, running for 21 calendar days, in line with LFB's established procedures.
- 4.2 At that point, subject to no material changes arising from consultation, people in scope will be declared at risk of redundancy. People Services will work across LFB and the wider GLA to seek opportunities for redeployment and redundancy avoidance.
- 4.3 If suitable alternative employment cannot be secured, then staff would be exiting from LFB in early 2024. Alongside this, the newly created roles would need to be recruited into if a match cannot be secured, which would run into early 2024. Those who are at risk of redundancy would also be able to apply for posts under the normal recruitment process. In addition, specialist investigation training will be required for the new PSU.

5. Risks

- 5.1 There are two key risks within these proposals:

5.2 Temporary disruption to the service provided to managers

RISK: The HR advisor and Employee Relations teams are small, staff-facing units within People Services, who are currently working through continuously high levels of demand. There is a risk that restructuring their roles and creating disruption within this space at a busy time could lead to a degradation in the service provided to managers across LFB in a high-risk area.

MITIGATION: The continuation of CMP's external support during this period of change will provide some mitigation due to the continued stability and route for redress, as will the development of the interim management team within People Services to provide continuity and assurance.

5.3 Temporary impact on the service provided to managers

RISK: There is a high-level of corporate knowledge and familiarity with LFB's policies and ways of working within the HR Advisor and ER teams. There is a risk that changing roles and resource within this space may lead to a temporary reduction in productivity as colleagues (new and existing) need to become familiar with these policies and ways of working.

MITIGATION: The development and implementation of the interim management team, the early development of clear role descriptions and the review of the discipline policy will provide mitigation and assurance in this space.

6. Workforce Impact

6.1 As a result of the proposed structure changes, it is likely that around ten staff may be placed at risk of redundancy. Due to the age demographic and average tenure of staff within People Services, the exit costs are likely to be substantial.

6.2 As per LFB's approach to redundancy, outplacement support will be procured for affected staff. The maximum cost for this is estimated at £20,000 as a one-off cost.

6.3 Consultation will need to be undertaken with staff and trade unions, which may alter any proposals.

7. Communications Impact

7.1 An approach is being developing to communicate the changes upcoming within People Services. These messages will initially focus on upcoming restructure of

the department, including the establishment of the PSU, and will then move onto forward-looking messaging where LFB will engage on the transformational activity taking place, the changes to the way services will be delivered and promote successes within the function.

8. Procurement Impact

8.1 Across the above sections, there are two elements of procurement requested:

- An additional three-month extension to CMP to cover new investigations from 1 October 2023 to 31 December 2023. The contract with CMP was awarded 23 January 2023 for an initial period of 7-months with the option to extend 3 x months (18 months in total). The first of the extensions takes LFB to 30 September 2023. As previously, LFB will be exercising the optional extensions provided for within the contract awarded. The scope of work will remain the same and therefore, this represents no material change.
- An external investigation service to provide further resilience, independent review, and quality assurance for the PSU. Current initial forecast figure of £250,000 for a 3-year contract, based on the expectation of 7 cases per year throughout the contract.

8.2 The new provider of external investigation support running from 1 October 2023:

- The new contract will enable LFB to implement a new model of delivery.
- In line with recommendation number two from the Culture Review (“Consider anonymised reporting of incidents relating to bullying, misogyny and racism. In a closed team-based culture individuals/groups can and have become stigmatised for reporting poor behaviour or bad experiences”), and outcome number three (“Staff can report incidents anonymously with no fear of the repercussions”), an independent, external service provides assurance to colleagues they can raise their concerns for considerations without fear of repercussions.
- CMP Solutions Limited has provided and continue to provide this service, and to provide continued assurance to colleagues raising concerns it is vital that there is no break between CMP Solutions Limited and whichever organisation is engaged with for the next three years in this space. Coming onboard from October allows for LFB to ensure that contact information is communicated, the new service is embedded, and it can begin service immediately with no break in continuity.

- Given the urgency of the requirement, Procurement has sought to explore the marketplace, the proposed framework will provide what is required to ensure value for money. On that basis, it has been concluded that the quickest and lowest risk to running a competition is via Bloom via the NEPRO (3) Framework. This framework is fully compliant with Public Contract Regulations

9. Financial Impact

9.1 The one-off costs include:

- a. CMP – to cover up to 10 cases being referred to them from 1 October 2023 to 31 December 2023. This will be paid on a case-by-case basis.
- b. Training cost to stand-up the PSU. This will provide specialist investigation training.
- c. Potential redundancies costs. This an early estimated cost at the top end of the assumed bracket. It does not include specific pensions benefits.
- d. External outplacement support. This will cover associated costs with re-deployment and training.
- e. Legal cost for implementation of this restructure.
- f. A contingency amount due to variable costs around potential redundancy, redeployment, and pensions.

9.2 The annual costs include:

- a. External service provider to replace CMP.

9.3 Phase 2 of the implementation of the People Services restructure is anticipated to realise c.£300,000 of savings based on early design and evaluation work.

10. Equality comments

10.1 The LFC and the Deputy Mayor for Fire and Resilience are required to have due regard to the Public Sector Equality Duty (section 149 of the Equality Act 2010) when taking decisions. This in broad terms involves understanding the potential impact of policy and decisions on different people, taking this into account and then evidencing how decisions were reached.

10.2 It is important to note that consideration of the Public Sector Equality Duty is not a one-off task. The duty must be fulfilled before taking a decision, at the time of taking a decision, and after the decision has been taken.

10.3 The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership (but only in respect of the requirements to have due regard to the need to eliminate discrimination),

race (ethnic or national origins, colour, or nationality), religion or belief (including lack of belief), sex, and sexual orientation.

10.4 The Public Sector Equality Duty requires decision-takers in the exercise of all their functions, to have due regard to the need to:

- a. eliminate discrimination, harassment and victimisation and other prohibited conduct.
- b. advance equality of opportunity between people who share a relevant protected characteristic and persons who do not share it.
- c. foster good relations between people who share a relevant protected characteristic and persons who do not share it.

10.5 Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard to the need to:

- a. remove or minimise disadvantages suffered by persons who share a relevant protected characteristic where those disadvantages are connected to that characteristic.
- b. take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it.
- c. encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

10.6 The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include steps to take account of disabled persons' disabilities.

10.7 Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard to the need to:

- a. tackle prejudice
- b. promote understanding.

10.8 The below table shows the level of representation of staff across gender, disability, ethnicity and sexual orientation in the potentially impacted teams and the broader People Services population. This will be refined and developed as the proposals proceed through consultation.

	Percentage representation across potentially impacted teams	Percentage representation across People Services	Difference
Female	70%	64%	+6%
Disability	11%	12%	-1%
Ethnic Minority	48%	46%	+2%
LGB	N/A	9%	N/A

10.9 The above data shows a slightly higher representation of women in the potentially affected group compared to the wider directorate, with too few colleagues identifying as lesbian, gay and bisexual (LGB) in the potentially affected group to disclose here. For colleagues identifying as from an ethnic minority background or as having a disability, the rate of representation in the potentially affected group is very similar to the rate of representation across People Services more broadly.

10.10 The above data is a useful introduction however it should be noted that approximately 25% of staff did not share any diversity information across ethnicity, disability or sexual orientation which limits the ability to assess the impact of these proposals on staff within People Services. This data will continue to be refined as consultation progresses.

10.11 Prior to advancing with these proposals, consultation with affected colleagues and trade unions will take place, which may shape these proposals further. The outcome of consultation will help assure and manage the potential impacts on colleagues, and there will be a focus on redeployment as a priority (including across the GLA umbrella wherever possible).

10.12 Noting the potentially disproportionate challenges relating to finding new roles for older colleagues, as well as those with disabilities, outplacement support will be procured to ensure that any colleague who cannot be supported into a new role will be supported in finding new employment opportunities, including time to apply for roles. Colleagues who are on maternity leave or other long-term leave will be engaged with through their line management chain to ensure all colleagues are included and receive all necessary information and support.

10.13 A full equality assessment is provided at Appendix 2.

11. Financial comments

- 11.1 This paper proposes the first phase of a new structure for People Services and is requesting authorisation from The Deputy Mayor for Fire & Resilience and for the London Fire Commissioner to incur revenue expenditure of up to £2,000,000, including £1,300,000 for potential redundancy costs. It should be noted however that this does not include an estimate for any early release of pensions benefits, with the expectation that this will be contained within the overall cost envelope of £2,000,000, including the contingency of £246,900. If costs exceed this envelope this will be discussed as part of future financial reporting in line with governance arrangements as necessary.
- 11.2 The breakdown of the proposed expenditure is as per the table below.
£1,750,000 as one-off expenditure in 2023/24 financial year and a further £250,000 expenditure across 4 financial years, starting in October 2023.
- 11.3 The proposed new structure – as detailed above and in the appendix – represents a £45,000 annual saving. This is reflected in the financial summary table below, netting off the total funding requirement for each financial year.
- 11.4 The additional funding requirement for the 2023/24 financial year is £1,784,722 including one-off and ongoing expenditure. If the proposals outlined in this report are agreed, this total pressure will be funded from the Budget Flexibility Reserve. The Budget Flexibility Reserve currently has a forecast balance of £8.502m at the end of the 2023/24 financial year, reflecting the forecast as at LFC Quarter 1 2023/24 Financial Position Summary (£9,024,000) and further commitments of £432,725 made in DMFD204 and £89,000 in DMFD210. The additional expenditure included in this report will reduce this forecast balance to £6,679,000. The LFC also maintains a General Reserve at a forecasted balance of £17,038,000. This is based on a minimum general reserve requirement of 3.5% of the net revenue expenditure.
- 11.5 If the proposals outlined in this report are agreed, the cost of future years – as outlined in the table below - will be included as part of the budget process for 2024/25.
- 11.6 Any financial implications from subsequent phases of a new structure for People Services will be set out in future reports and incorporated as part of budget setting for future years. As noted above, Phase 2 of the implementation of the People Services restructure is anticipated to realise c.£300,000 of savings based on early design and evaluation work, which will be in addition to the £45,000 savings achieved in Phase 1. Taking account of the annual cost of the external service, this would mean a net saving of around £260,000 from 2024/25 after Phase 2.

11.7 It should also be noted that the 2023/24 budget process included a savings target of £300,000 for the 2024/25 financial year and a further £600,000 from the 2025/26 financial year onwards for the Department. These saving targets are unchanged by the proposals in this report and will be set out in future reports and incorporated as part of the budget setting process for the 2024/25 and subsequent financial years.

Item	One Off 2023/24	Starting in Nov 2023				Total Over 3 Years
		2023/24	2024/25	2025/26	2026/27	
CMP – to cover the cost of up to 10 cases being referred to them	£150,000					£150,000
External Service Provider to be procured. Total cost of contract (7 cases per year, for 3 years)		£34,722	£83,333	£83,333	£48,611	£250,000
Training cost to stand-up PSU	£23,100					£23,100
Top end of potential redundancies cost	£1,300,000					£1,300,000
External outplacement support	£20,000					£20,000
Legal costs for implementation	£10,000					£10,000
Contingency	£246,900					£246,900
Total Requested	£1,750,000	£34,722	£83,333	£83,333	£48,611	£2,000,000
Less savings on proposed new structure			(£45,608)	(£45,608)	(£45,608)	(£136,824)
Updated Net Position	£1,750,000	£34,722	£37,725	£37,725	£3,003	£1,863,176

12. Legal comments

12.1 Under section 9 of the Policing and Crime Act 2017, the London Fire Commissioner (the "LFC") is established as a corporation sole with the Mayor appointing the occupant of that office. Section 1 of the Fire and Rescue Services Act 2004 states that the LFC is the fire and rescue authority for Greater London.

12.2 The Fire and Rescue Services Act 2004 provides under sections 7 and 8 the *duty to secure provision for the personnel, services and equipment necessary efficiently to meet all normal requirements*; that being the personnel needed to meet the statutory functions, and section 5A provides the power to do (a) anything it considers appropriate for the purposes of the carrying-out of any of its functions (its "functional purposes"), (b) anything it considers appropriate for purposes incidental to its functional purposes, (c) anything it considers appropriate for purposes indirectly incidental to its functional purposes through any number of removes. These powers and or duties provide the statutory basis for the decision set out herein regarding the proposed People Services personnel, structure and the proposed use of external resource.

12.3 The LFC is also a 'best value' authority under the Local Government Act 1999 and must make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy,

efficiency, and effectiveness. This duty is also fulfilled by the proposals in this report.

12.4 The proposal to restructure People Services has the potential to create redundancies.

The law on consultation is as follows:

- Consultation must begin in good time. Certain minimum time periods apply depending on the scale of the redundancies proposed. For fewer than 20 employees, there must be 'collective consultation', and there is no minimum duration of consultation.
- Consultation begins with the provision of information on the proposals to "appropriate representatives". The information to be provided is specified under section 188(4) of TULRCA
- As a minimum, consultation must be undertaken with a view to reaching agreement on ways and means of avoiding the dismissals, reducing the number of dismissals, and mitigating their consequences.

12.5 The Brigade's redundancy and redeployment code (PN 562) states as follows at paragraph 2:

2.1 Information will be provided to, and consultation will take place with, the recognised trade unions over proposed redundancies at the earliest opportunity and in accordance with statutory requirements. Information provided for the purpose of consultation will include the reasons for the proposals; the numbers and descriptions of employees likely to be affected; the procedure for selecting those employees who will be made redundant; the timescales and proposed redundancy arrangements; and the proposed method of calculating any redundancy payments.

2.2 Consultation will also take place with individuals who are at risk of redundancy at the earliest opportunity.

12.6 For the Brigade, the custom and practice is 21 days for consultation.

The report sets out, in broad terms, the process and time scale for consulting on the proposals and the time scales and process for redundancies should they result, and these are consistent with the policy and legal requirements.

12.7 The report addresses the procurement activity proposed to engage a new external service and to continue a service with CMP from October to December 2023. The procurement team have commented on this in the report.

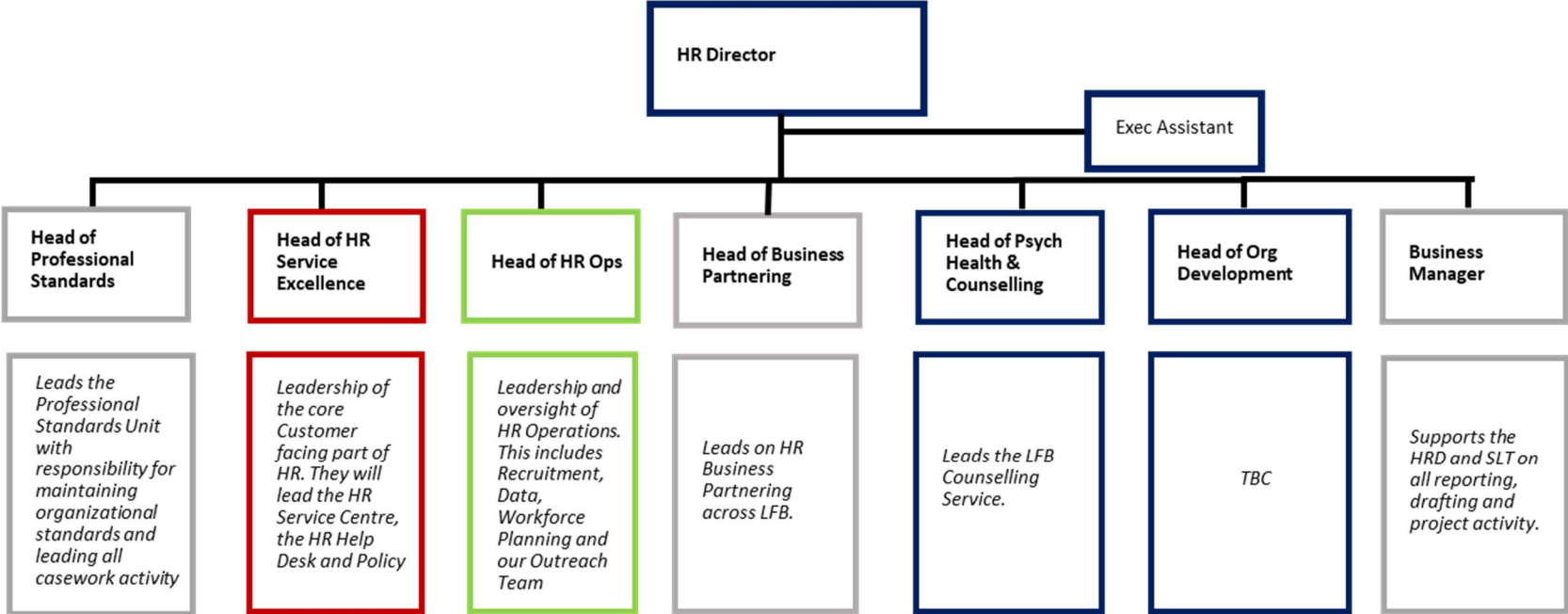
12.8 Under section 327D of the GLA Act 1999, as amended by the Policing and Crime Act 2017, the Mayor may issue to the Commissioner specific or general directions as to the manner in which the holder of that office is to exercise his or her functions. By direction dated 1 April 2018 (the 'Directions'), the Mayor set out those matters, for which the Commissioner would require the prior approval of either the Mayor or the Deputy Mayor for Fire and Resilience (the "Deputy Mayor"). 6.3 Paragraph (b) of Part 2 of the said direction requires the Commissioner to seek the prior approval of the Deputy Mayor *before "[a] commitment to expenditure (capital or revenue) of £150,000 or above as identified in accordance with normal accounting practices..."*. The proposals in this report are £150,000 or more and so the Direction is engaged.

Confidential appendices and supporting papers

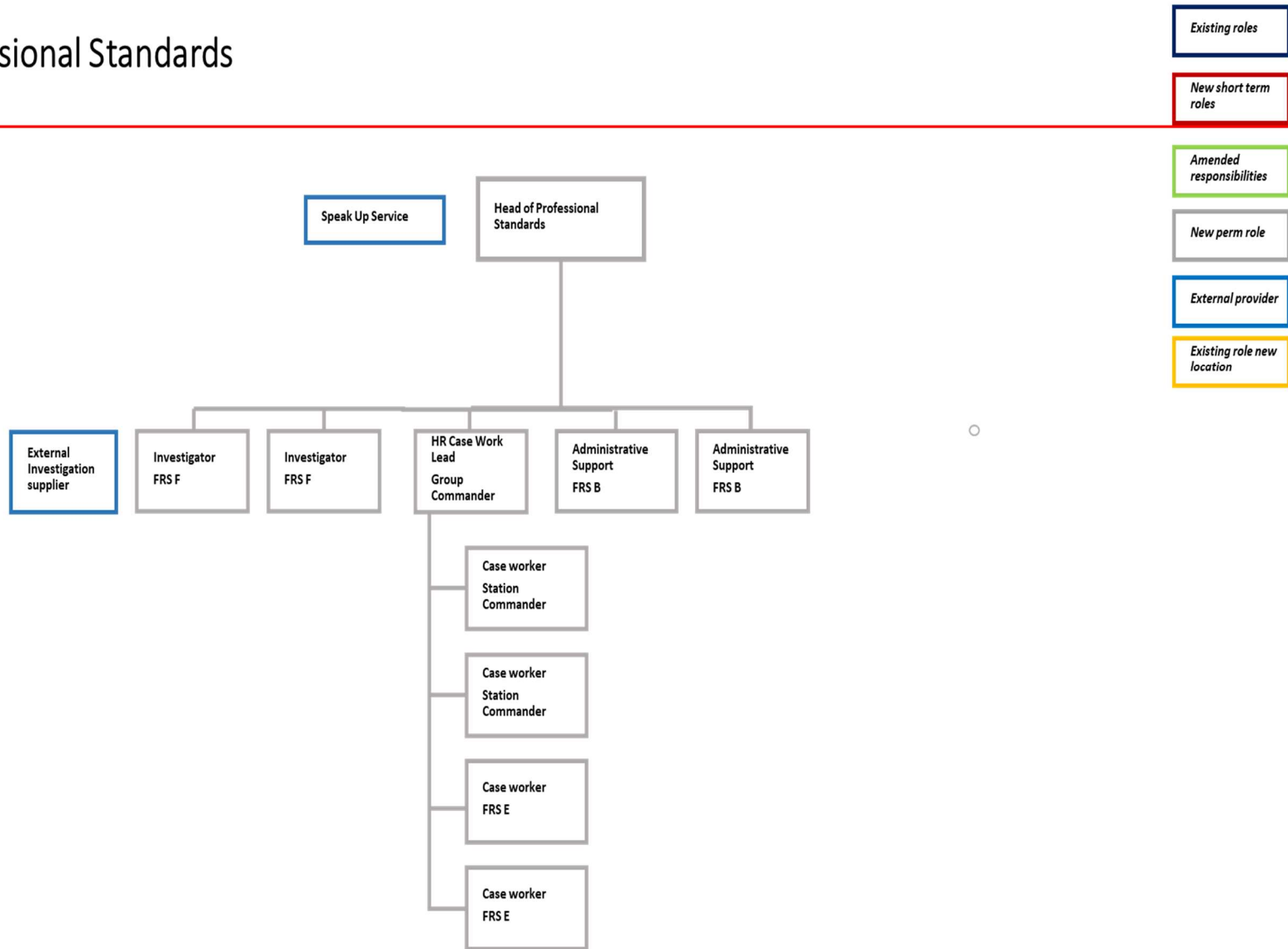
Appendix	Title	Open or confidential
1.	Proposed People Services structure	Confidential
2	People Services restructure equalities impact assessment (EIA)	Confidential

Phase 1 – October 23 to December 23

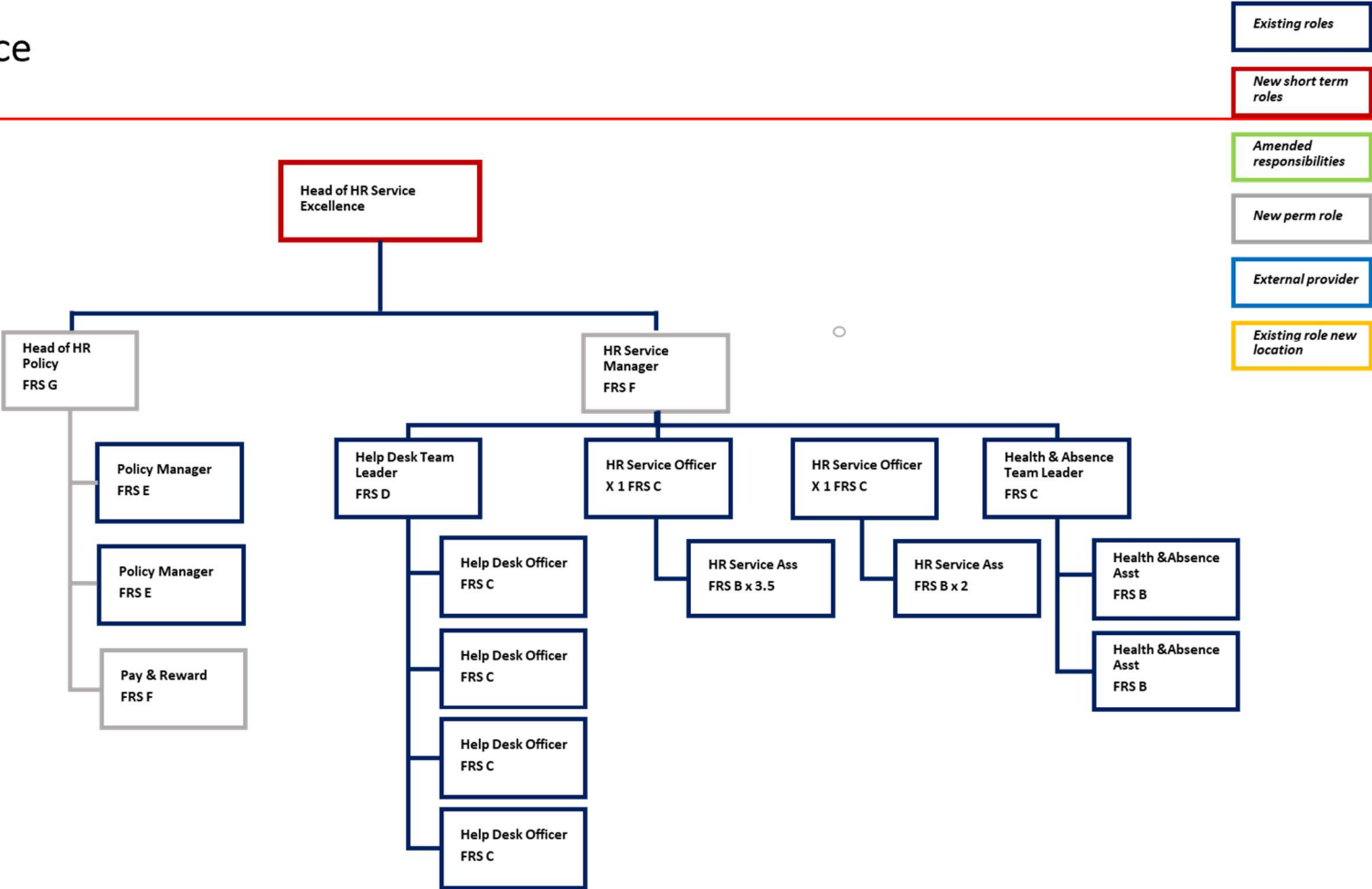
Org Structure beneath this level is included to show changes to teams in this phase
Where teams haven't changed charts are not included



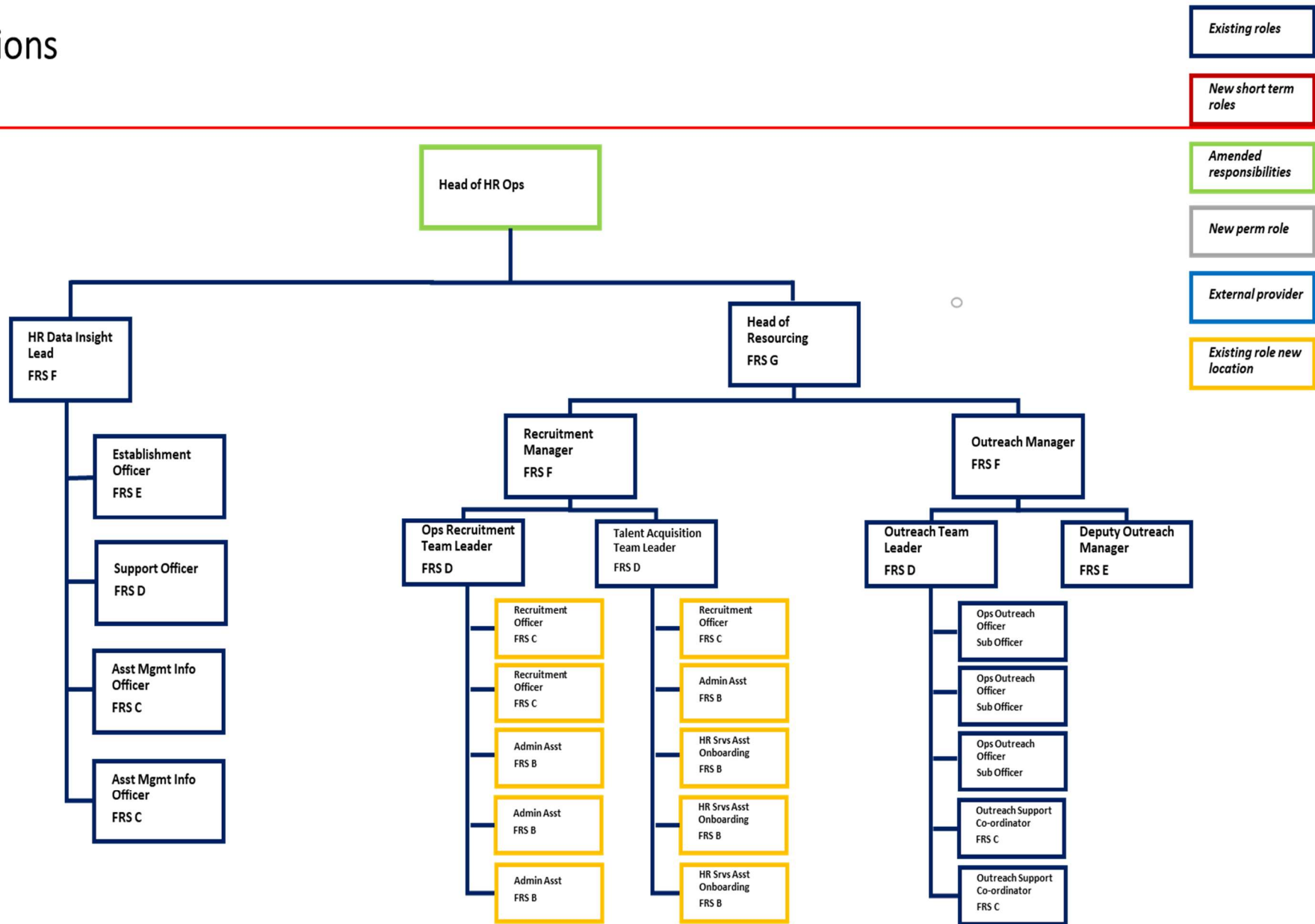
Professional Standards



Service Excellence

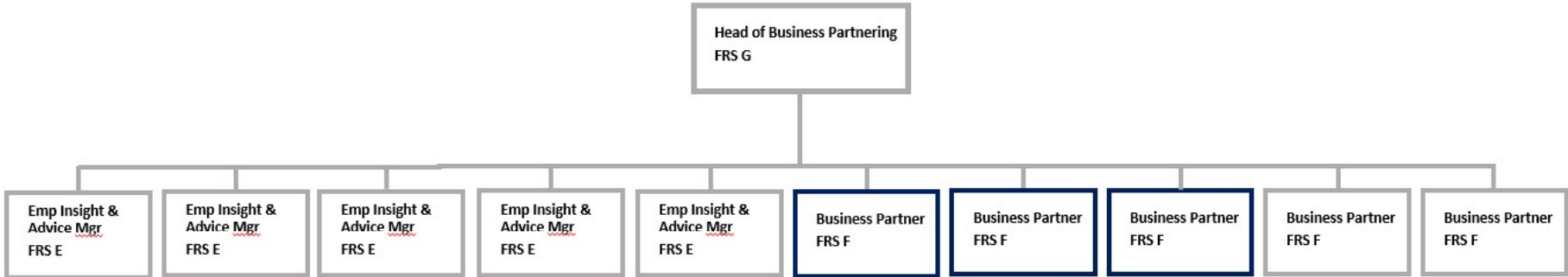


HR Operations



Business Partnering

- Existing roles
- New short term roles
- Amended responsibilities
- New perm role
- External provider
- Existing role new location





LONDON FIRE BRIGADE

Appendix 2 – People Services restructure equality impact assessment (EIA)

Equality Impact Assessment (EIA) Form

The purpose of an EIA is to give as much information as possible about **potential** equality impacts, risks or opportunities that your policy, activity or project may have on different groups of people.

This Equality Impact Assessment should:

- demonstrate due regard for the provisions of the Public Sector Equality Duty (PSED);
- identify possible negative impacts of decisions on individuals and groups with protected characteristics and plan mitigating action accordingly; and,
- identify additional opportunities to advance equality within policies, strategies, and services.

Summary

1. What is the name of the policy, project, decision or activity?	
Transformation of People Services Department	
2. What is its purpose and desired outcome	
What is the aim and purpose of the policy, project, decision or activity?	<p>This is an equality impact assessment (EIA) of proposals to transform the organisation structure and ways of working for the People Services Department (PSD) at London Fire brigade (LFB).</p> <p>This assessment is intended to help decision makers to consider the potential impact of transformation on individual members of staff and diversity in PSD (and wider implications); to prepare plans to support staff through the changes, and to ensure that the plans do not discriminate against staff in the groups outlined below.</p>
Who is affected by this work (all staff, specific department, wider communities?)	This EIA assesses the impact of the PSD’s transformation programme on current (and potentially future) staff of different race, disability, religion or belief, gender and sexual orientation groups.
What other policies/documents are relevant to this EIA?	<p>Following the publication of the Independent Culture Review (ICR) of London Fire Brigade (LFB) in November 2022, the Review of the People Services function in January 2023, and the recommendations from His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS - Effectiveness, efficiency, and people 2021/22 – London Fire Brigade), clear areas for change and transformation of the People Services function and its offering to LFB have emerged.</p> <p>The proposed high-level new structure of the department has been developed and presented to the Board, with further details still to be decided.</p> <p>We will also need to ensure any proposals are compliant with Policy 562 (Redundancy and redeployment code – fire and rescue staff and control staff).</p>
Additional comments	Given its nature, restructuring may have a negative impact on equality, especially so if it involves redundancy procedures. For



	<p>example, more men than women may come forward to request voluntary redundancy, or a compulsory redundancy process may result in a higher proportion of staff from underrepresented groups being redeployed or made redundant than might be expected given the staff population of PSD. All staff with protected characteristics are at risk of being affected, and to meet our responsibilities under PSED, an EIA will be to be completed to understand the extent of the impact of different groups.</p> <p>Methodology</p> <p>We will gather views directly from PSD staff, Equality Staff Groups (ESGs) and the Unions on how proposals might affect specific groups of staff and any issues that could lead to different outcomes for staff in the various diversity groups. It is important to note that we may not be able to consult with all staff currently in PSD but will put in place measures to ensure any issues raised are representative. Where possible, we will also use LFB’s HR data as well data collected from the 2023 staff survey to inform our assessment of impact. Should it be appropriate we may use a smaller pulse survey to collate views from PSD staff on various issues related to the transformation proposals.</p> <p>We will engage regularly with staff and ensure that we use a variety of channels and media so that our communication is widely accessible and understandable particularly to neurodivergent colleagues.</p> <p>Where proposals are found to have a negative impact on a particular group, we will explore alternative procedures to identify steps that can be taken to mitigate the impact. If other restructuring plans are not feasible, we will ensure the decision to proceed is justified within the permits of law.</p> <p>We will record any steps that have been taken to change proposals in mitigating the impact to ensure that any negative impact does not constitute unlawful discrimination and can be justified to a third party. The justification for decisions, as well as any actions that will be taken to mitigate impact, will be recorded in this EIA which will assist LFB in ensuring that actions are implemented. This evidence will be needed if any challenges to the proposals are made.</p>
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3. EIA owner	
Name of EIA lead author	Nadia Bob-Thomas
Department and Team	Head of Belonging, Inclusion and Wellbeing, People Services Department
Have you attended an EIA Workshop	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Name of EIA owner (responsible for signoff)	Cliff Morton

4. Assessment

<p>Generic considerations</p>	<p>Timely and proper consultation is a key part of our equality impact assessment, and we make a commitment to talk to all staff at the earliest practicable point in the transformation process, so they are able to inform what we do, and empowered to make the best choices for them. An absence of clear information about how, when and why organisational change and redundancy are occurring can give rise to unhelpful speculation among staff, particularly as there is already a high level of tension in the air. Staff will likely envisage ‘worst case scenarios’. It should be noted that the results of the most recent staff survey show a participation rate of 57% for PSD (96 of 169), which may be an indication of a lower level of engagement from staff, and of them between 8-12% thought that PSD had a clear vision for the future that was effectively communicated.</p> <p>We will need to be mindful that the proposals may create an atmosphere of uncertainty and low morale which may impact productivity and lead to staff perceiving themselves as ‘victims’ of an unfair process, especially as the focus is being placed solely on PSD. This is especially so if staff feel they are competing against one another for a limited number of jobs, following a restructure.</p> <p>We are keen to seek the views of people who share protected characteristics in particular, to find out how it is likely to affect them, and to use those views to inform this impact assessment and any recommendations. Any engagement should be carefully developed as 50% of the PSD staff survey respondents did not think they were treated fairly at work which may heavily influence the outcome of discussions; a similar number didn’t feel they share their views openly.</p>
<p>Wellbeing considerations <i>Consider how this piece of work may impact the physical and mental wellbeing of staff and/or the communities in London?</i></p>	<p>Structural changes of the scale being proposed are likely to unsettle staff and cause stress. Individuals who have been doing a job for a long time might find this challenging. Restructuring will raise very real worries for people, with questions about how they will ‘survive’ financially, and possibly support dependants if redundancies are being considered, alongside concerns about their skills, experience and the likelihood of finding alternative employment, especially for longer-serving members of staff.</p> <p>It is important that the appropriate level and avenues of support are put in place, made available and appropriately signposted for those who need advice or are concerned about the impact of the transformation on their jobs and future career in LFB.</p>
<p>Possible opportunities <i>Consider how this piece of work may contribute to improving the efficiency/effectiveness/culture of the organisation?</i></p>	<p>Whilst there will be concerns around some potential adverse impacts on groups of people, we are also keen to emphasise the potential opportunities the transformation of PSD will bring. HR’s role will be re-defined to be more supportive to organisational and staff needs, particularly around improved line management competence and support. The staff survey showed that less than a fifth of PSD respondents thought their own policies were easy to understand or consistently used, which could indicate that there may be healthy support for the change, if managed well.</p> <p>Internally, it would be a chance for PSD staff (and others) to see positive changes with respect to training opportunities,</p>

IT resources and being able to work in more challenging and interesting roles. The proposed changes will offer staff from a diverse range of groups the opportunity to work on new projects and be empowered with new responsibilities. This should resonate with staff given that only 35% thought they were provided opportunities for personal development or had access to adequate training for their roles. staff survey results. If implemented properly, the transformation would be an opportunity to provide access to refreshed training courses.

5. Impacts on groups protected **under** the Equality Act 2010

SEX (how might men and women be affected differently by your activity, project or policy?)

Assessment of Impact:

Human Resources is an area of any organisation which typically attracts higher numbers of female professionals so this may result in more women being affected by restructuring than men. This is true for LFB and PSD has a higher proportion of female staff than male, so the former is likely to be more impacted by any changes as a result of the transformation proposals. The initial assessment of colleagues potentially in scope of the proposed changes show that 70% of those affected identify as female, which is higher than the proportion of People Services staff identifying as female (64%).

While analysis of HR data supports the statement above, the pay gap report does not show a particular disadvantage to this group. We will however rely on consultation to provide information relating to the re-employability of this group and challenges they may face due to their gender.

Consultation

(list all stakeholders you have consulted with and record the scale of risk they have identified and/or any opportunities)

[INSERT SUMMARY OF DISCUSSIONS TO COMPLETE ASSESSMENT]

- High impact
- Medium impact
- Low impact
- Opportunities

Information used in assessment: See below data tables

RACE (including nationality, colour, national and/or ethnic origins - what are the ethnicities of the staff or community members who are likely to come into contact with your activity, project or policy? E.g., there are a disproportionate number of BAME staff at junior grades at LFB, does this proposal affect junior staff more? Does this policy/project/proposal affect anything where inequalities have been identified? E.g. COVID-19, low income professions,

health or social inequality?)	
<p>Assessment of Impact: LFB’s 2022 Pay Gap report showed that staff from minority ethnic backgrounds are overrepresented across our lower paying roles across the organisation and especially in FRS roles, with less than 4% currently earning above £60k. We expect this to be reflective in PSD. As a key driver in our pay gap redundancies in this group will further impact this and will need to be strongly justified in the wake of the outcomes of culture review and subsequent recommendations. The initial assessment of colleagues potentially in scope of the proposed changes show that 48% of those affected identify as from an ethnic minority background, which is slightly higher than the proportion of People Services staff identifying as from an ethnic minority background (46%).</p> <p>Analysis of HR data supports the findings of the pay gap report, particularly that Black men are most disadvantaged in the organisation. This group will be particularly impacted by the transformation proposals and face challenges securing reemployment, redeployment and up-skilling opportunities.</p>	<p><input checked="" type="checkbox"/> High impact <input type="checkbox"/> Medium impact <input type="checkbox"/> Low impact <input type="checkbox"/> Opportunities</p> <p>Information used in assessment: See below data tables</p>
<p>Consultation <i>(list all stakeholders you have consulted with and record the scale of risk they have identified and/or any opportunities)</i></p> <p>[INSERT SUMMARY OF DISCUSSIONS TO COMPLETE ASSESSMENT]</p>	

AGE (please refer to specific age group, and avoid using generic terms like ‘younger’ or ‘older’ - will a particular age group be affected -i.e. does it relate to youth services, or pensions? e.g. This proposal will disproportionately impact one team in X department, as everyone in this team is over the age of 55).	
<p>Assessment of Impact: There is a relatively equitable spread of staff across most age groups within PSD and it is likely that all ages will need to be supported through the changes.</p> <p>Analysis of HR data indicates that particular attention should be paid to the age group between 40-49 as it reflects the largest proportion of staff in PSD. The pay gap report does not show a particular disadvantage to this group (or any other ages), and we cannot</p>	<p><input type="checkbox"/> High impact <input checked="" type="checkbox"/> Medium impact <input type="checkbox"/> Low impact <input type="checkbox"/> Opportunities</p>

<p>conclude how or whether this group may be negatively impacted by transformation proposals. We will therefore rely on consultation to provide additional information relating to the re-employability of this group and challenges they may face due to their age.</p>	<p>Information used in assessment: See below data tables</p>
<p>Consultation <i>(list all stakeholders you have consulted with and record the scale of risk they have identified and/or any opportunities)</i></p> <p>[INSERT SUMMARY OF DISCUSSIONS TO COMPLETE ASSESSMENT]</p>	

<p>SEXUAL ORIENTATION (applies to lesbian gay, bisexual and heterosexual people - Does your activity, project or policy involve employees or communities disclosing any information about their family or living situation?)</p>	
<p>Assessment of Impact: There is a low number of staff working across PSD who have disclosed they identify as lesbian, gay or bisexual (LGB). The initial assessment of colleagues potentially in scope of the proposed changes show that fewer than five of those affected identify as LGB, which is lower than the proportion of People Services staff identifying as LGB (9%), noting that around a quarter of staff across People Services have not provided information on sexual orientation.</p> <p>While there are a number of LGB staff in PSD, our analysis of existing data and the pay gap report does not show a particular disadvantage to staff identifying as LGB and we cannot conclude how or whether this group may be negatively impacted by transformation proposals. We will therefore rely on consultation to provide additional information relating to the re-employability of this group and challenges they may face due to their sexual orientation.</p>	<p>Information used in assessment: See below data tables</p>
<p>Consultation <i>(list all stakeholders you have consulted with and record the scale of risk they have identified and/or any opportunities)</i></p> <p>[INSERT SUMMARY OF DISCUSSIONS TO COMPLETE ASSESSMENT]</p>	<p><input type="checkbox"/> High risk <input type="checkbox"/> Medium risk <input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Opportunities</p>

DISABILITY (physical, sensory, mental health, learning disability, long term illness, hidden - what measures will you put in place to make sure policies are accessible to employees with a learning disability, or who are neurodiverse be able to access this policy easily? How will you evaluate this? What steps have you taken to make sure your activity or practice is accessible to those with physical impairments? If using stations or buildings, are these accessible?)

Assessment of Impact:
 There is a smaller number of staff working across PSD who have disclosed as having a disability of some sort, and additional work will need to be undertaken to understand the nature of the disabilities to ensure that individual needs are met throughout the transformation process. The initial assessment of colleagues potentially in scope of the proposed changes show that 11% of those affected identify as having a disability, which is marginally lower than the proportion of People Services staff identifying as having a disability (12%).

While there are a number of staff with disabilities in PSD, our analysis of available data alongside the findings of the pay gap report does not show a particular disadvantage to this group and we cannot conclude how or whether they may be negatively impacted by transformation proposals. We will therefore rely on consultation to provide additional information relating to the re-employability of this group and challenges they may face due to their disabilities.

High impact
 Medium impact
 Low impact
 Opportunities

Information used in assessment: See below data tables

Consultation
(list all stakeholders you have consulted with and record the scale of risk they have identified and/or any opportunities)

[INSERT SUMMARY OF DISCUSSIONS TO COMPLETE ASSESSMENT]

RELIGION OR BELIEF (people of any religion, or no religion, or people who follow a particular belief - does this proposal affect things like uniform, appearance, or facilities?)

Assessment of Impact:
 Just over a third (37%) of PSD staff identify as Christian with the next highest religious group being Hinduism (6%). It should also be noted that a significant number of PSD staff have chosen not to disclose their religion which could hide the true impact on this group.

High impact
 Medium impact
 Low impact

<p>While there are a number of staff practicing different religions across PSD, our analysis of available data alongside does not show a particular disadvantage to this group and we cannot conclude how or whether they may be negatively impacted by transformation proposals. However, research indicates that those from Muslim faiths face more challenges when seeking work and we will therefore rely on consultation to provide additional information relating to the re-employability of this group.</p>	<p><input checked="" type="checkbox"/> Opportunities</p> <p>Information used in assessment: See below data tables</p>
<p>Consultation <i>(list all stakeholders you have consulted with and record the scale of risk they have identified and/or any opportunities)</i></p> <p>[INSERT SUMMARY OF DISCUSSIONS TO COMPLETE ASSESSMENT]</p>	

<p>MARRIAGE / CIVIL PARTNERSHIP (married as well as same-sex couples does this activity, policy or practice require information about people's marriage or civil partnership status, if so is this necessary and justifiable?)</p>	
<p>Assessment of Impact: It is unlikely that the transformation programme will have a direct or indirect impact on any staff from a particular relationship status however, this could be linked to caring responsibilities.</p> <p>We will need to complete further analysis to understand the different relationship status of staff across PSD however, research suggests that marital status does not affect unemployment or reskilling of this group. We will consult further to obtain supporting to confirm this.</p>	<p><input type="checkbox"/> High impact <input type="checkbox"/> Medium impact <input checked="" type="checkbox"/> Low impact <input type="checkbox"/> Opportunities</p> <p>Information used in assessment: See below data tables</p>
<p>Consultation <i>(list all stakeholders you have consulted with and record the scale of risk they have identified and/or any opportunities)</i></p> <p>[INSERT SUMMARY OF DISCUSSIONS TO COMPLETE ASSESSMENT]</p>	

PREGNANCY AND MATERNITY (in what way may your activity, project or policy impact (or potentially exclude) pregnant staff or those on maternity leave? How will they access this policy if they need to?)

<p>Assessment of Impact: We will need to complete further analysis to understand the level of parental leave currently taken or planned across PSD. Research shows that staff falling in this bracket experience greater challenges during transformation and securing opportunities of reemployment, redeployment or upskilling.</p>	<input checked="" type="checkbox"/> High impact <input type="checkbox"/> Medium impact <input type="checkbox"/> Low impact <input type="checkbox"/> Opportunities
<p>Consultation <i>(list all stakeholders you have consulted with and record the scale of risk they have identified and/or any opportunities)</i></p> <p>[INSERT SUMMARY OF DISCUSSIONS TO COMPLETE ASSESSMENT]</p>	<p>Information used in assessment: See below data tables</p>

GENDER REASSIGNMENT (someone proposing to/undergoing/undergone a transition from one gender to another or who identifies as non-binary)

<p>Assessment of Impact: It is unlikely that the transformation programme will have a direct or indirect negative impact on any staff falling into this category.</p> <p>However, if this should change, the impact on staff falling into this category would be high as even though there is limited research of individuals transitioning in the workplace, what is available suggests challenges with issues around reskilling.</p>	<input type="checkbox"/> High impact <input type="checkbox"/> Medium impact <input checked="" type="checkbox"/> Low impact <input checked="" type="checkbox"/> Opportunities
<p>Consultation <i>(list all stakeholders you have consulted with and record the scale of risk they have identified and/or any opportunities)</i></p> <p>[INSERT SUMMARY OF DISCUSSIONS TO COMPLETE ASSESSMENT]</p>	<p>Information used in assessment: See below data tables</p>

6. Impacts on groups **outside the Equality Act 2010**

Consider the impact on: carers, parents, care leavers, ex-offenders, people living in areas of disadvantage, homeless people, people on low income / in poverty.



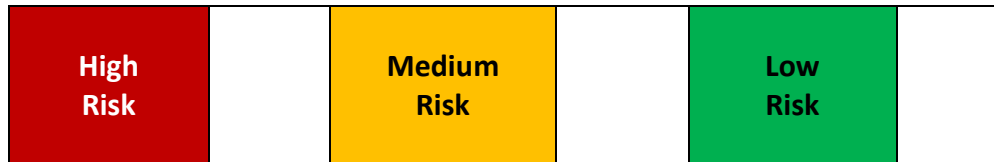
LONDON FIRE BRIGADE

- a) Carers - we will need to complete further analysis to understand the different caring responsibilities across PSD, however research suggests that marital status does not affect unemployment or reskilling of this group. We will consult further to obtain supporting to confirm this.
- b) Long service LFB employees (to be confirmed after further data analysis and consultation is completed)

For completion by Inclusion team:

Document Control

RAG rating: *Overall Equality Impact of this policy, project, decision or activity*



High: Evidence of significant adverse impact. This activity should be stopped until further work is done to mitigate the impact.

Medium: Some potential adverse impact against one or more groups. The risk of impact may be removed or reduced by implementing the mitigating activities below.

Low: No adverse impacts have been identified.

7. Legal duties under the Public Sector Equality Duty - s149 Equality Act 2010 (How does this work help LFB to...)	
<p>Eliminate discrimination? <i>This box is about any direct/ indirect discrimination, considerations where bias may impact decisions/delivery, how to make processes avoid discrimination etc.</i></p>	<p>Reorganising People Services’ staff and management-facing teams will provide a greater level of support and HR expertise to LFB. The introduction of a PSU and ongoing external support will provide a greater level of assurance for colleagues in raising their concerns with the LFB. Reviewing our policies and procedures by connecting our HR service and policy teams will help ensure inclusivity is built into the processes which affect all staff in the LFB.</p> <p>This will be further developed through consultation and added to as the proposals progress.</p>
<p>Advance equality of opportunity between different groups? <i>This box is about positive action – how can you improve communication between protected characteristic groups, access, education, furthering work in communities to support them etc?</i></p>	<p>The assurance of an independent PSU, the improved service levels and accessibility of HR materials to staff across the LFB, and the better connection of employee insight and advice with business partnering will enable LFB to address concerns promptly, identify risks and challenges prior to them becoming issues, and ensure our policies and materials are accessible and inclusive.</p> <p>This will be further developed through consultation and added to as the proposals progress.</p>

Foster good relations between different groups? <i>This box is about working with ESGs, and community groups (internal and external)</i>	The role of ESGs and trade unions is an important one for the LFB, and the restructuring of People Services teams to draw together centres of expertise with a clear plan against the developing People Strategy will enable close working with these groups. This will ensure insight and experience is captured and acted upon throughout.
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8. Mitigating and justifying impacts (where an adverse impact has been identified, please record the steps that are being taken to mitigate or justify it?)		
Protected characteristic and potential adverse impact	Action being taken to mitigate or justify	Lead person responsible for action
If colleagues who are older and have longer service are displaced, there may be increased barriers to applying for new roles	Provision of outplacement support for all impacted staff, and a focus on redeployment across the GLA umbrella wherever possible.	
If colleagues are on maternity, paternity or shared parental leave, or on long-term sick, they may not have the same opportunity to be engaged in consultation	All staff who are away from work will be identified, and line managers will be supported to engage with them to ensure that affected staff are fully engaged in consultation.	
This will be further developed through consultation and added to as the proposals progress.		

9. Follow up actions and evaluation (where contributors have recommended specific actions to demonstrate due regard, these must be recorded here and delivered in accordance with time scales. These actions will be monitored and outcomes evaluated by the Inclusion team who will report to various stakeholders such as the leadership team, trade unions and ESGs).		
Action recommended and person responsible for delivery	Target date Action to be completed by	Date action completed
To be established through consultation		

Review date:

Lessons learnt and evaluation	To be established through consultation		
Signed (lead for EIA / action plan)		Date	
Sign off by Inclusion Team		Date	
Linked policies/EIAs			

Equalities profile of People Services Department

According to the London Fire Brigade's (LFB) HR data, as of August 2023, the total number of staff in People Service Department (PSD) is 99. This figure includes 9 members of seconded operational staff who are currently working in PSD on a temporary basis and are therefore not included in this assessment.

Throughout this paper, the data for FRS staff and those Operational staff working in PSD on a permanent basis (90 in total) has been aggregated together to ensure the protection of personal data.

The People Service Department (PSD) is the one of the largest corporate services areas, behind Prevention & Protection and Ops Resilience & Control. It is of a similar in size to two other corporate departments Information & Comm Technology, Property & TSS.

The profile provides a breakdown of staff against protected characteristics and excludes the group of temporarily staff deployed on detached duties into PSD that are outlined above.

1. Gender (Sex)

There is a higher number of female staff working across PSD than men (58 out of 90), and they account for nearly two thirds of all staff (64%).

	Male	Female	Total
Staff	32	58	90

High-level analysis

- Just over 50% of females sit in FRS grades B-E, and the highest proportion of men sit in FRS grades C, E and F.

2. Race (ethnicity)

Just under half (46%) of PSD staff are from Black, Asian or another ethnically underrepresented group (41 out of 90).

	White	Ethnically underrepresented group	Total
Staff	49	41	90

[High-level analysis](#)

- Just over 35% of Black, Asian or another ethnically underrepresented staff sit in FRS grades B. 78% sit in FRS grades B-E.

3. Age

There is a relatively equitable spread of staff across most age groups within PSD, with more staff below the ages of 50 years (52 out of 90) and the highest concentration sitting in the age bracket between 40-49 (25 out of 90).

	FRS Staff
20-29	10
30-39	17
40-49	25
50-54	13
55-59	14
60+	11
Total	90

High-level analysis

- 75% of staff over 55 years of age sit in FRS grades C, E and F.

4. Sexual Orientation

There is a low number of staff working across PSD (8 out of 90) who have disclosed they identify as LGB, however the number is representative of the organisation as a whole. It should be noted that a significant number of staff (21 out of 90) have chosen not to disclose their sexual orientation.

	LGBTQ+	Non-disclosed
Staff	8	21

5. Disability

There is a lower number of staff working across PSD (11 out of 90) who have disclosed as having a disability of some sort however, and this is representative of the organisation as a whole.

	Non-disabled	Disability	Total
Staff	79	11	90

6. Religion

The most common religion amongst staff within PSD is Christianity (37%), the next common is Hinduism (6%), with all others accounting for less than 5% of staff. It should be noted that a significant number of staff either practice no religion or have chosen not to disclose their faith group.

	FRS Staff
Christian	33
Hindu	5
Other Religions	9
No religion	23
Undisclosed	20
Total	90

High-level analysis

- 75% of staff disclosing as practicing a religion sit in FRS grades C, D, E and F.

7. Other Considerations

Further analysis is being completing to cross reference the impact of intersectionality issues regarding roles, caring responsibilities, parental leave and long service. This profile will be updated to reflect these findings once this has been completed.