



LONDON FIRE BRIGADE

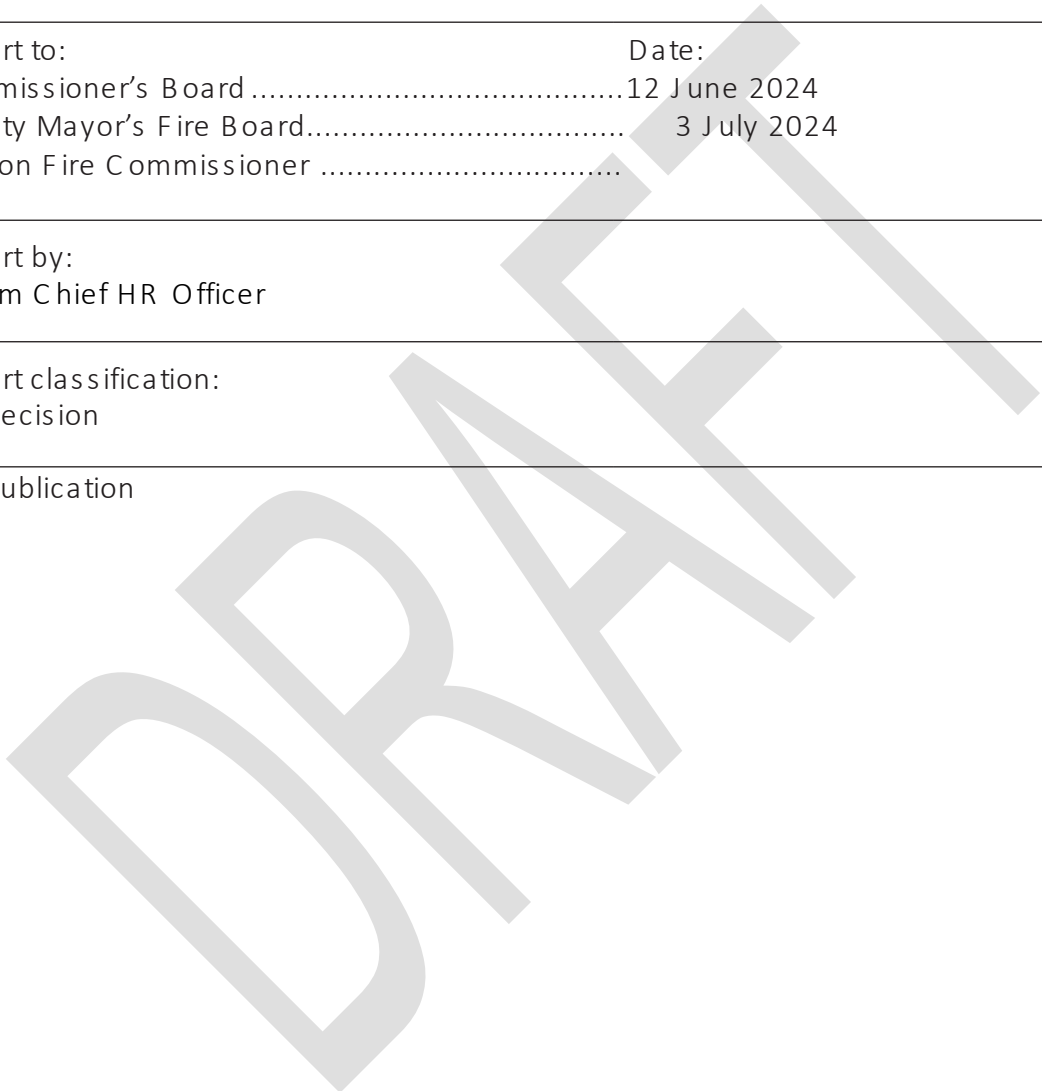
# LFB People Services Transformation – Phase Two

Report to:	Date:
Commissioner’s Board .....	12 June 2024
Deputy Mayor’s Fire Board.....	3 July 2024
London Fire Commissioner .....	

Report by:  
Interim Chief HR Officer

Report classification:  
For decision

For publication



# PART ONE

## Non-confidential facts and advice to the decision-maker

### Executive Summary

This paper proposes the second phase of the People Services transformation following the implementation of phase one, as agreed in DMFD 212 and LFC-23-086, which ran from September 2023 until March 2024.

The focus of this restructuring is to continue to improve service delivery, alongside opportunities for ensuring the future of HR service delivery in LFB is sustainable.

#### For the Deputy Mayor

That the Deputy Mayor for Planning, Regeneration and the Fire Service authorises the London Fire Commissioner to commit to revenue expenditure of £946,366 in 2024-25 and approximately £1,419,549 annually in future years for the implementation of Phase Two of the People Services restructure as set out in the options of appendix 1.

This LFC decision will only be taken after further consultation with the Greater London Authority's finance and legal advisers and Mayoral Delivery Board.

#### For the London Fire Commissioner

That the London Fire Commissioner approves the recommendations set out as option three in appendix 1 and approves the proposed Directorate structure set out in Appendix 2 to this report.

That the London Fire Commissioner agrees to commit to annual revenue expenditure of £946,366 in 2024-25 and approximately £1,419,549 annually in future years for the implementation of Phase Two of the People Services restructure as set out in the options of appendix 1.

# 1 Introduction and background

- 1.1 In November 2022, the Independent Culture Review (ICR) of the London Fire Brigade (LFB), commissioned by the London Fire Commissioner, highlighted significant cultural challenges within the organisation.
- 1.2 The ICR provided 23 recommendations aimed at addressing these issues, many of which pertain directly to People Services.
- 1.3 In response to the ICR and to enhance the People Services function, the London Fire Brigade People Strategy was developed. This strategy, engaged on with senior leaders, is designed to transform People Services into a customer-focused, high-value function and is currently seeking approval through governance.
- 1.4 Phase Two represents the next iteration of HR in LFB. The design principles are:
  - Breaking down the Organisational Development team into smaller teams. This will allow the Head of Organisational Development to focus on key areas and further promote the importance of EDI by reporting directly to the People director.
  - Re-structuring the Outreach Team, to more effectively increase the number of candidates from ethnic minority backgrounds.
  - Bringing managerial and leadership training elements from Learning and Professional Development into HR.
- 1.5 Phase Two aims to improve HR service delivery by:
  - Grouping the Counselling and Trauma Service (CTS) and Wellbeing teams together to form Mental and Physical Health, moving it into the Health and Safety function. This includes the Fitness Advisors, who will continue to provide proactive support around OH referrals and other related activities.
  - Creating Psychological Wellbeing Practitioner (PWP) roles to clear the backlog of existing cases in CTS and to speed up service delivery thereafter.
  - Growing the Equality Diversity and Inclusion (EDI) team, including the creation of EDI Excellence roles that will work across teams in LFB to recognise and promote good EDI practices and advise on where improvements could be made.
  - Bringing Leadership Academy, Learning Resilience, Talent, Coaching and Mentoring back into People Services department from Learning and Professional Development (L&PD). These roles will be grouped with organisational design and development (OD&D) specialists to form the Organisational Development function.
  - Restructuring the Outreach team and growing by one role to provide additional coordination and administrative support of outreach events.
  - Establishing a Business Support Officer role to work with the HR Business Manager, to provide department co-ordination and reporting administration capacity.
- 1.6 The proposed People Services structure is attached as Appendix 2, which shows the next iteration of structural changes and outlines responsibilities.
- 1.7 Organisation Charts for all teams in scope for Phase Two are attached as Appendix 2.

## 2. Equality, Diversity, and Inclusion

- 2.1. The EDI team will serve as experts in promoting fairness and positive culture within the LFB. They will provide advice on protected characteristics and champion behaviours

that make LFB “a great place to work”.

- 2.2. Improved EDI advice and guidance will help managers and staff make better decisions, fostering a positive work environment and encouraging the reporting of negative experiences.
- 2.3. Inclusivity training will be regularly reviewed to ensure that it is impactful and not seen as procedural. Training people at every point of their career in LFB will promote a consistent understanding of equity, one of the Brigade’s core values.
- 2.4. Recognising and rewarding good EDI behaviours is a key part of the refreshed EDI Strategy, which is currently being consulted on with the representative bodies. The EDI team will engage in maturity modelling across the LFB, in line with NFCC tools, collaborating with Heads of Department to highlight positive behaviours and recommend improvements, as required.
- 2.5. The EDI strategy is driven by data. Incorporating insights derived from data into implementing successful EDI initiatives is a key part of the EDI strategy.

### **3. Mental and Physical Health Team**

- 3.1 Combining the Counselling and Trauma Service (CTS) with the Wellbeing team will integrate support for mental and physical health of LFB personnel. CTS will focus on delivering clinical support, while the Wellbeing team will develop strategies and guidance to promote positive wellbeing. This is in line with recommendations following a review by the Samaritans.
- 3.2 The introduction of the two Psychological Wellbeing Practitioner (PWP) roles will bridge the gap between Mental Health First Aiders (MHFAs) and CTS clinical expertise. This will:
  - Enable CTS to focus on delivering clinical services.
  - Remove responsibilities outside of CTS remit, such as corporate presentations, support for trainee firefighters and coordination of MHFAs.
- 3.3 The Mental and Physical Health Team will move to Health and Safety, including budgeting and responsibilities regarding occupational health (OH). This will create a cohesive approach to managing and mitigating health and safety impacts on staff under the Assistant Director for Health and Safety.
- 3.4 The four fitness advisor roles within People Services will move with the Wellbeing team into the Mental and Physical Health team. This will allow them to continue current service delivery.

### **4. Organisational Development Team**

- 4.1 Phase One emphasised reducing senior posts to empower leaders, minimise bureaucracy and enhance accountability.
- 4.2 The current Organisational Development Team structure, with nine direct reports under a single TMG C level role, poses a business continuity risk.
- 4.3 Restructuring into three specialized areas will mitigate this risk:
  - Organisational Design & Development, including Engagement and Values

- Leadership Academy and Learning Resilience
- Talent Management and Coaching & Mentoring

4.4 The Leadership Academy will deliver 4 leadership programmes; TMG Development, Colin Townsley, Gillian Tanner and Frank Bailey.

4.5 Placing the Talent Strategy, which is currently being drafted, close to leadership development means that we can tailor our approach to leadership development. It also means that changes to the leadership development programmes can be delivered more efficiently in order to remain relevant and aligned to the NFCC frameworks. There will also be a direct approach to supporting the learning and development of people with neurodiverse needs.

4.6 Two Organisational Effectiveness roles will be renamed to Organisational Design and Development Managers, functioning in a consultancy capacity. They will foster positive relationships within LFB through the HR Business Partnering team. They will be brought in as the subject matter experts for all organisation effectiveness through the lens of the OD&D specialism, as outlined by the Chartered Institute of Personnel and Development (CIPD); the professional body for HR, learning and development.

## 5. Outreach Team

5.1 The Outreach team, part of Resourcing, within the HR Operations, connects directly with candidates, focusing on potential Firefighters in London. There are other teams across LFB that perform similar functions (such as Fire Cadets, external communications, etc.).

5.2 The team hosts events within local and underrepresented communities to highlight Firefighters roles. This also includes experience days, which promotes the understanding of life on station and helps to promote the offering that LFB has.

5.3 However, the time between events and recruitment campaigns can vary. This means that resources need to be dedicated to keep interest levels high through ongoing engagement through communication, which is currently delivered through Zoom calls.

5.4 There is also the need to deliver equity through support for people who are identified as neurodiverse.

5.5 Data shows that female applicants are 20% more likely to not meet the physical requirements of the Firefighter role, and so are given more support to develop physical strength prior to attending recruitment assessment centres.

5.6 Social media campaigns are currently outsourced and require ongoing contract management.

5.7 The future Outreach Team structure will separate candidate communication from engagement activities, both crucial to the Resourcing Strategy and employee value proposition (EVP). Growth in engagement activities improve event management.

## 6. Timeline of Activity

6.1 Implementation of Phase Two will begin to deliver the next iteration of organisational development in August 2024, with recruitment of new posts to begin shortly thereafter

and running through the next few months, following budget approval.

- 6.2 Due to the onboarding of a new Head of Physical and Mental health team, we propose moving CTS and Wellbeing at the end of August to allow for a smoother transition.

## 7. Risks

- 7.1 There are two key risks within the proposals outlined above:
- 7.2 Disruption to services. Changes to team structures and remits will inevitably impact of service delivery for a short time. These will naturally subside once teams have embedded into their new ways of working.
- 7.3 Volatility of job market. The proposed changes include the introduction of new roles. As the current market is volatile and there can be no guarantees given that the new roles will be filled through recruitment within the next few months.

## 8. Equality comments

- 8.1 The LFC and the Deputy Mayor for Planning, Regeneration and the Fire Service 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.
- 8.2 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.
- 8.3 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.
- 8.4 The Public Sector Equality Duty requires decision-takers in the exercise of all their functions, to have due regard to the need to:
- eliminate discrimination, harassment and victimisation and other prohibited conduct.
  - advance equality of opportunity between people who share a relevant protected characteristic and persons who do not share it.
  - foster good relations between people who share a relevant protected characteristic and persons who do not share it.
- 8.5 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, in particular, to the need to:
- remove or minimise disadvantages suffered by persons who share a relevant protected characteristic where those disadvantages are connected to that characteristic.
  - 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.

- encourage people 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.

- 8.6 The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.
- 8.7 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, in particular, to the need to:
- tackle prejudice
  - promote understanding.
- 8.8 An equalities impact assessment was conducted and found that, with no posts at risk of redundancy, and the addition of twenty new posts, that there is no high impact adverse effect on members of staff with protected characteristics.
- 8.9 Due regard should be given to certain characteristics outlined in the EIA with the potential change in reporting lines as well as potential changes to working practices.

## 9. Other considerations

### Workforce comments

- 9.1 Engagement with Representative Bodies and Equality Support groups has taken place. Formal consultation is due to end on 18 June 2024.

### Sustainability comments

- 9.2 This report does not introduce any significant sustainability impacts. Where new policies and/or corporate projects arise, they are subject to the Brigade's sustainable development impact assessment process.

### Procurement comments

- 9.3 There are no procurement comments arising from this report.

### Communications comments

- 9.4 Internal communications activity will be carried out to explain these changes to the wider workforce, focusing on how they will benefit the workforce and how to access new services. This will be through existing channels. These changes and the outcomes they bring will be communicated externally to key stakeholders and communities as part of our work to communicate how we are delivering against the recommendations of the Culture Review and delivering transformation.

## 10 Financial comments

- 10.1 This paper is seeking authorisation to commit to revenue expenditure of £946,366 in 2024-25 and approximately £1,419,549 annually in future years for the implementation of Phase Two of the People Services restructure as set out in the options of appendix

1.

10.2 Ongoing annual revenue funding of approximately £1,350,000 was approved as part of the 2024/25 budget setting process under the Cultural Transformation Programme and is reflected in LFC's 2024/25 budget report to the Mayor.

10.3 The additional £69,549 annual funding requirement to deliver Phase Two of the People Services restructure is expected to be covered by existing departmental staffing or non-staffing budgets.

## 11 Legal comments

11.1 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.

11.2 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.

11.3 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.

11.4 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 Planning, Regeneration and the Fire Service (the "Deputy Mayor"). 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.

## List of appendices

Appendix	Title	Open or confidential*
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1	Options and Recommendations	Open
2	Proposed HR S structure	Open
3	Teams in S cope	Open
4	Equality Impact Assessment	Open

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## Part two confidentiality

Only the facts or advice considered to be exempt from disclosure under the FOI Act should be in the separate Part Two form, together with the legal rationale for non-publication.

Is there a Part Two form: NO

There are a range of options available. They are summarised in the following categories:

- Option one: Do nothing and continue with the current structure and responsibilities.

Pros	Cons	Risks
Easiest solution	Will not address recommendations made by HMICFRS	High risk of failing to achieve strategic objectives around diversity and inclusion in LFB
Does not require additional spend	Existing challenges to HR service delivery will not be resolved	Reputational damage from RBs and the general public if changes are not made
Will not have a temporary dip in output during settling in periods	Undermines the narrative of making improvements following the Independent Culture Review	Increasing recruitment costs to replace people leaving LFB due to an unsatisfactory working environment

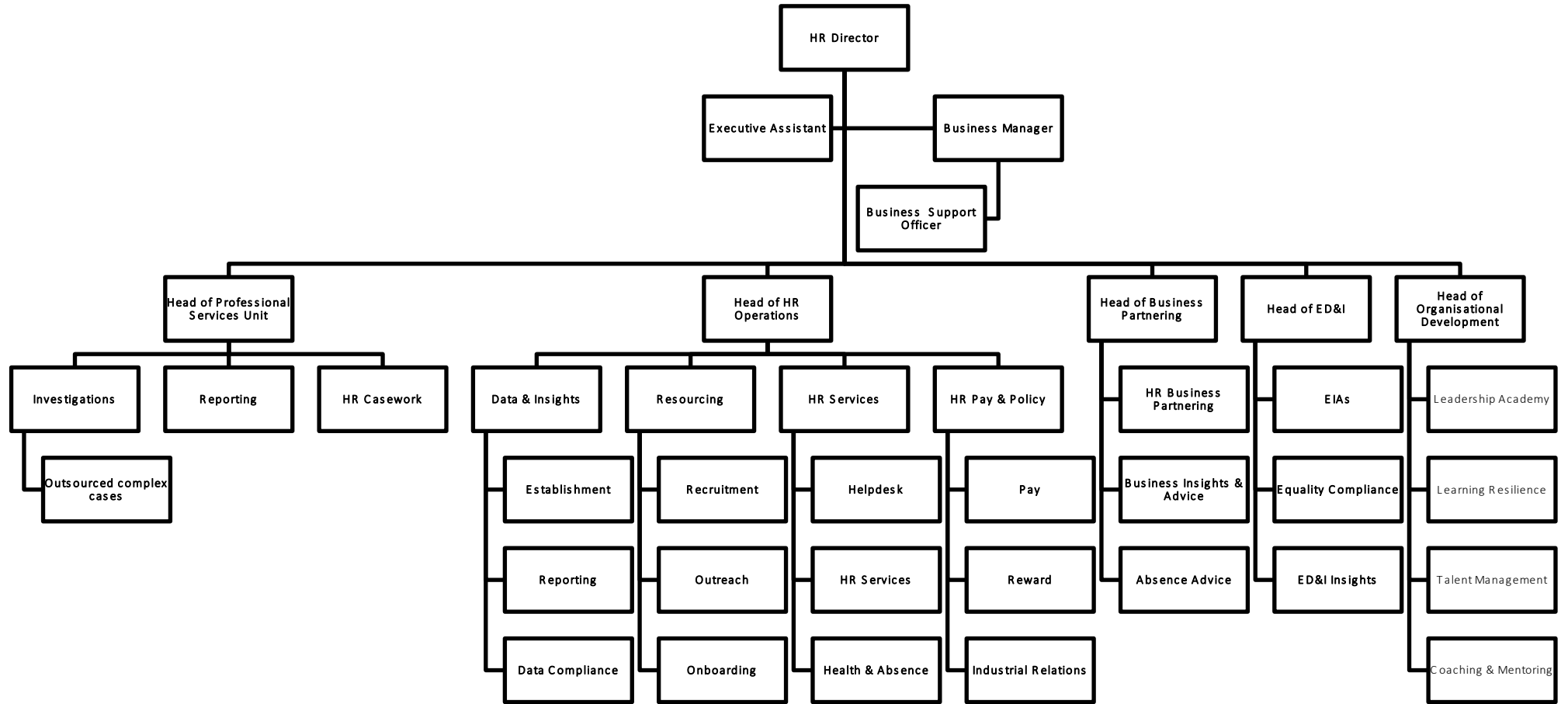
- Option two: Outsource and minimise direct service delivery from HR.

Pros	Cons	Risks
Risk is managed externally	Will require expertise in procurement and contract management	High risk of redundancies
Lower staffing costs	Not flexible or adaptable without incurring additional costs.	Reputational damage with RBs and the general public
Quickly brings missing capabilities into LFB	Could take much longer to implement if there are low levels of interest from bidders.	Poor service offering if SLAs are not met

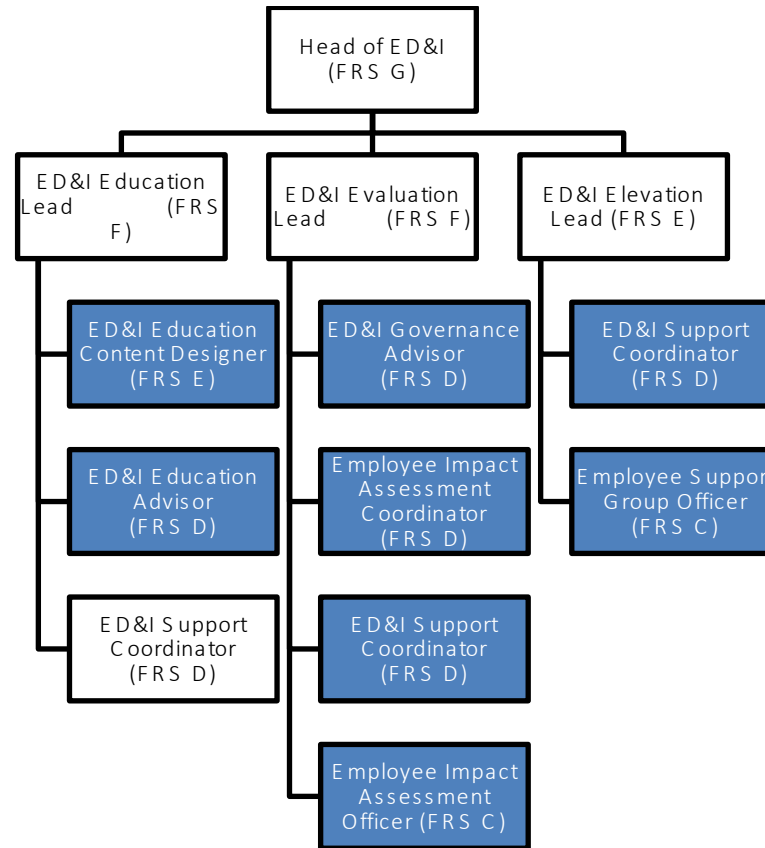
- Option three: (Recommended) Move to the new proposed structure and evolve ways of working to meet LFB needs.

Pros	Cons	Risks
Minimal risk of redundancies	Requires movement of roles which in turn requires a settling in period	Reduced output whilst changes are implemented
Addresses recommendation made by HMICFRS	May require further changes to resolve unknown issues that emerge following implementation	Difficulty to recruit into some new roles
Increased likelihood of achieving LB strategic objectives	Change fatigue amongst staff could compound disengagement	Poor communication could lead to reduced morale or engagement

Item	Cost
<b>Growth in People Services</b>	
EDI Team	£406,125
Outreach Team	£230,623
Leadership Academy	£724,781
Learning Support and Resilience	£59,525
Organisational Development	£47,528
<b>Growth in Health and Safety</b>	
Mental and Physical Health Team	£350,922
<b>Growth in Business Support</b>	
Business Support Officer	£59,525
<b>Removed roles</b>	
Removal of 6 vacant roles	-£459,480
<b>Total Phase 2 cost</b>	£1,419,549



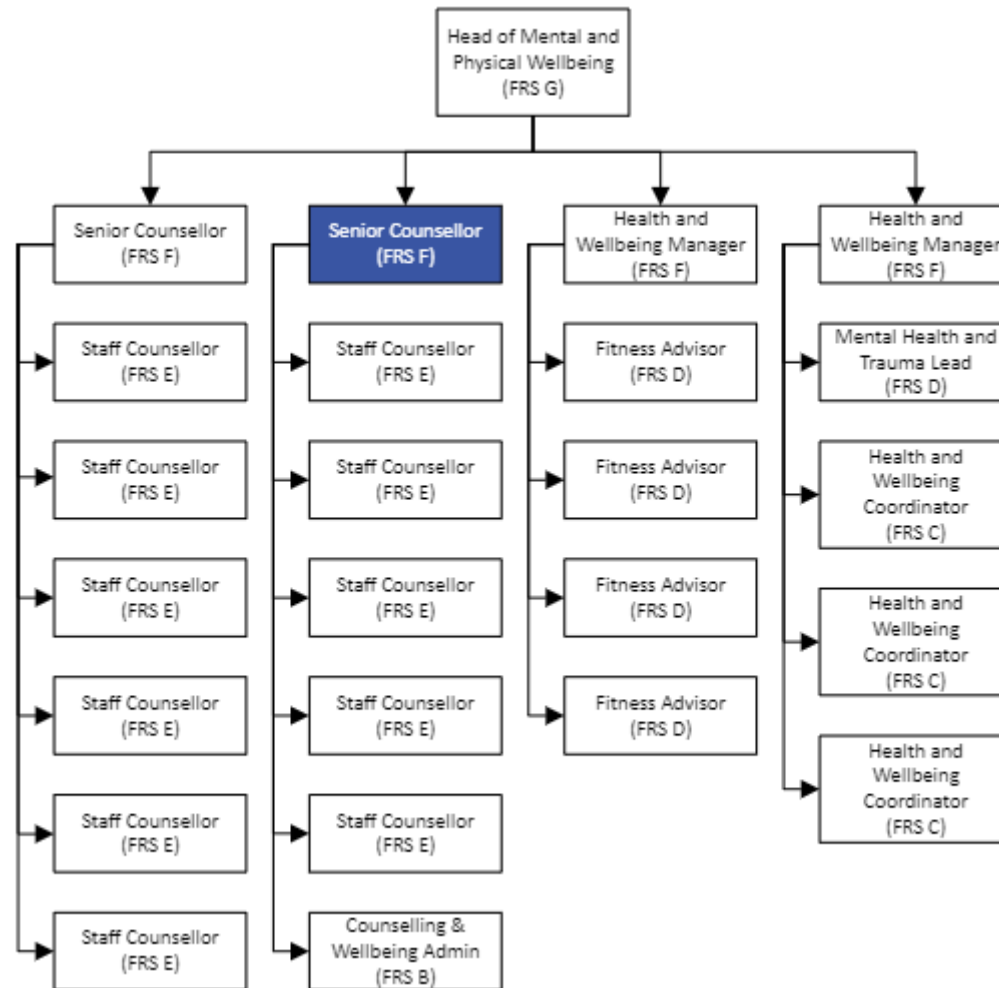
EDI Team



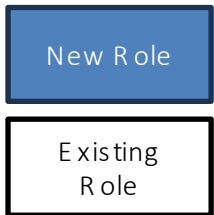
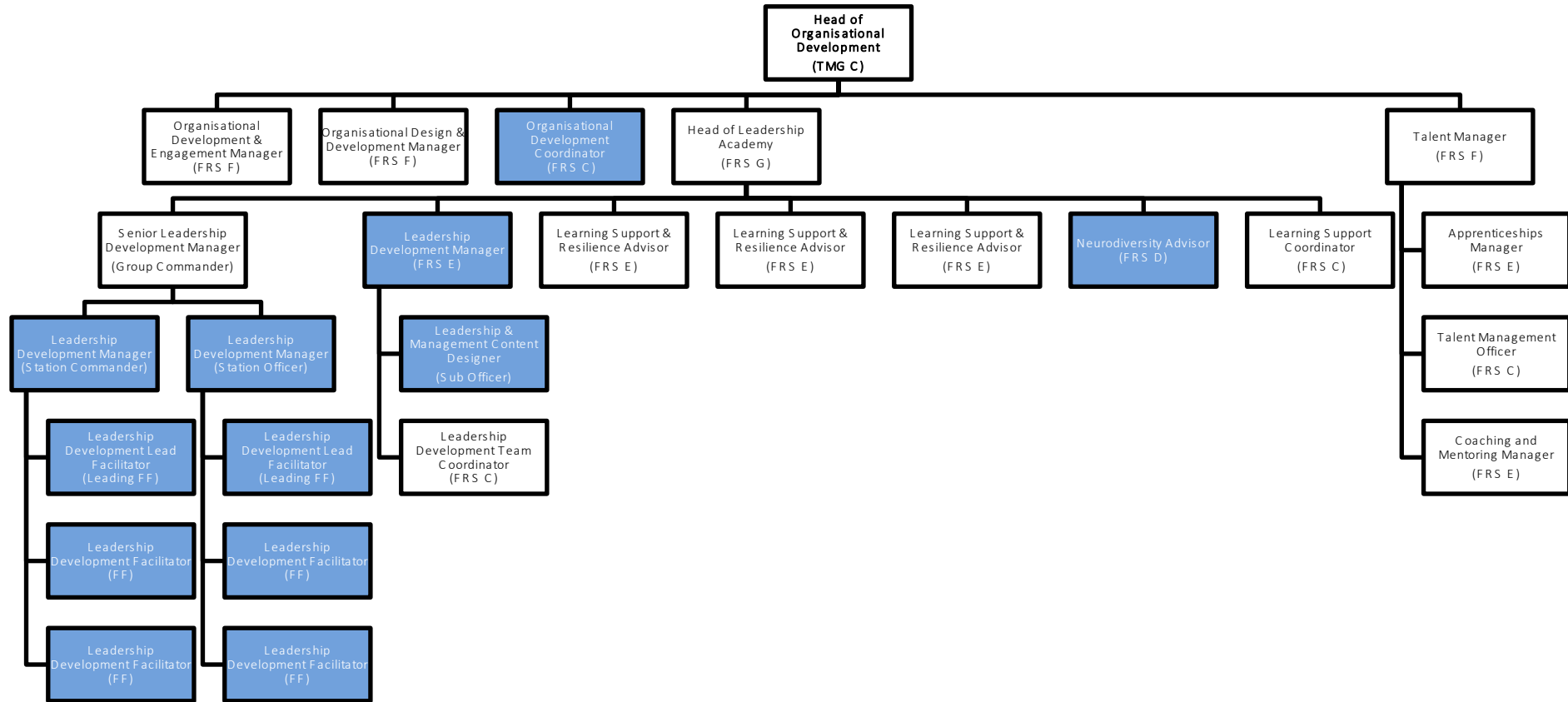
New Role

Existing Role

### Mental and Physical Health Team

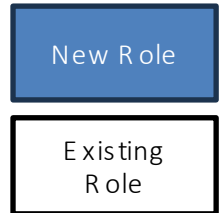
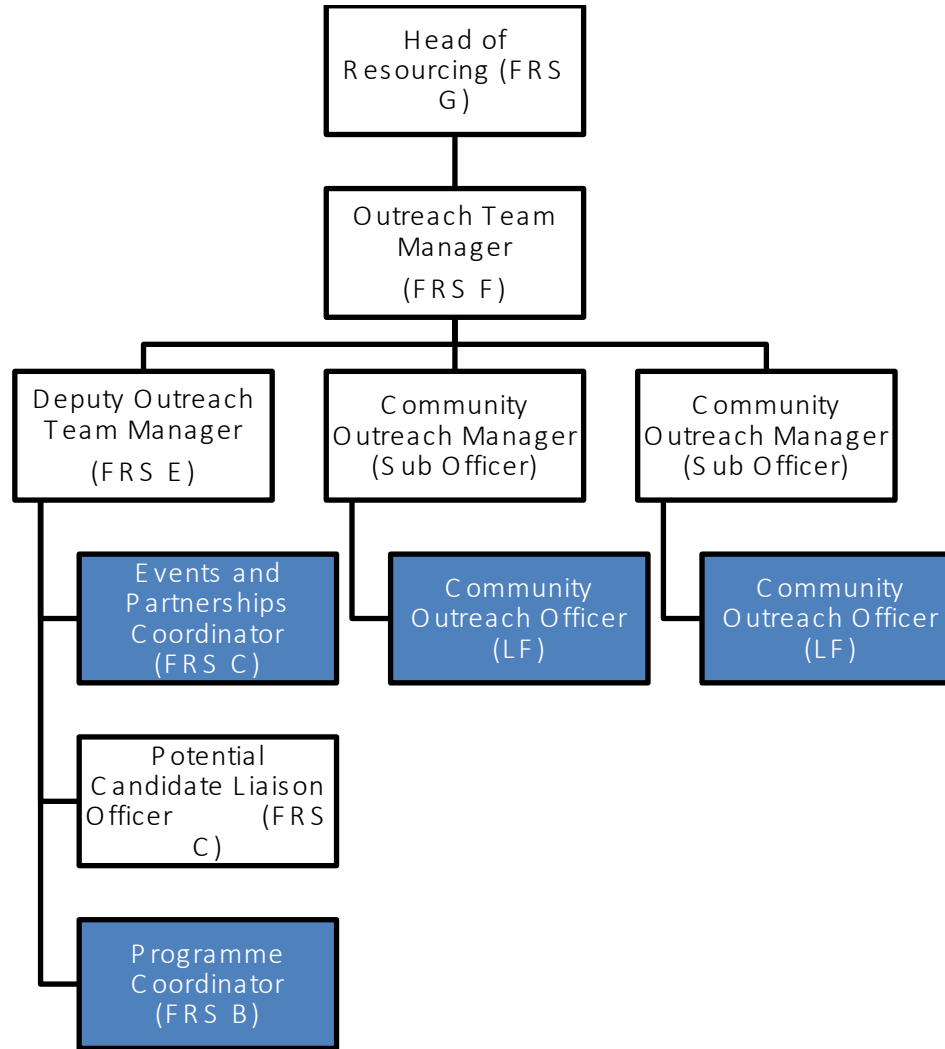


Organisational Development





Outreach Team



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**

<b>1. What is the name of the policy, project, decision or activity?</b>	
People Services Transformation – Phase 2	
<b>2. What is its purpose and desired outcome</b>	
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 both the People Services (PSD) and the Learning and Professional Development (L&amp;PD) departments at the 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 transformation programme on current (and potentially future) staff of different race, disability, religion or belief, age, 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 &amp; 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 structure of the departments has been developed and consulted upon following board approval.</p>



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	As of the writing of this EIA, there are no redundancies proposed within phase 2 of the transformation.
Additional comments	<p>Given its nature, restructuring may have a negative impact on equality. 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><b>Methodology</b>          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 engage with all staff 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.</p> <p>We will engage 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 options and/or 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>

3. EIA owner	
Name of EIA lead author	Ash Kohan
Department and Team	People Services
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><b>Generic considerations</b></p>	<p>Timely and proper engagement 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 is occurring can give rise to unhelpful speculation among staff. 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 feeling unfairly treated.</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 the full completion of 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 can share their views openly.</p>
<p><b>Wellbeing considerations</b> <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 are likely to unsettle staff and cause stress. Individuals who have been doing a job for a long time might find this particularly challenging regardless of any protected characteristics. Restructuring will raise very real worries for people, with concerns about their skills and experience, especially for longer-serving members of staff if their roles are changing.</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. We will continue to work with staff and interested stakeholders to ensure this is done in a timely manner.</p>
<p><b>Possible opportunities</b> <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 guidance.</p> <p>Internally, it would be a chance for staff to see positive changes with respect to training opportunities, 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). A properly implemented transformation would be an opportunity to provide access to refreshed training courses.</p>

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

<b>1. SEX</b> (how might men and women be affected differently by your activity, project or policy?)	
<p><b>Assessment of Impact:</b>          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, however, with operational staff; who are predominantly male; also affected, we may see a lower proportion of females impacted than initially expected as a result of the transformation proposals. The initial assessment of colleagues potentially in scope of the proposed changes show that 57% of those affected identify as female, which is lower than the proportion of People Services staff identifying as female (64%).</p> <p>While analysis of HR data supports the statement above, the pay gap report does not show a particular disadvantage to this group. However, there is some external evidence to show that older women are at a greater risk, especially if from underrepresented ethnic groups.</p>	<input type="checkbox"/> High impact <input type="checkbox"/> Medium impact <input checked="" type="checkbox"/> Low impact <input type="checkbox"/> Opportunities  <b>Information used in assessment: See below data tables</b>
<b>2. RACE</b> (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><b>Assessment of Impact:</b>          LFB's 2023 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 5% currently earning above £60k. We expect this to be reflective in PSD. The initial assessment of colleagues potentially in scope of the proposed changes show that 36% of those affected identify as from an ethnic minority background, which is lower than the proportion of People</p>	<input type="checkbox"/> High impact <input type="checkbox"/> Medium impact <input checked="" type="checkbox"/> Low impact <input type="checkbox"/> Opportunities  <b>Information used in assessment: See below data</b>

Appendix 4 – Equality Impact Assessment

Services staff identifying as from an ethnic minority background (41%).	tables
<b>Consultation</b> <i>(list all stakeholders you have consulted with and record the scale of risk they have identified and/or any opportunities)</i>	

**3.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).

<b>Assessment of Impact:</b> 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.  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, and forms 33% of the staff impacted by the proposals. 27% of staff impacted are aged 55 or over, which is only slightly lower than the percentage of staff in PSD ages 55 or over (28%). The pay gap report does not show a particular disadvantage to this group (or any other ages), and we cannot conclude how or whether this group may be negatively impacted by transformation proposals. There is some external evidence to suggest that age must be considered in relation to gender and race to show which groups are potentially at greater risk when redeployed. 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.	<input type="checkbox"/> High impact <input checked="" type="checkbox"/> Medium impact <input type="checkbox"/> Low impact <input type="checkbox"/> Opportunities  <b>Information used in assessment: See below data tables</b>
<b>Consultation</b> <i>(list all stakeholders you have consulted with and record the scale of risk they have identified and/or any opportunities)</i>	

**4.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?)

<b>Assessment of Impact:</b> There are 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 11% of staff affected by the proposed changes identify as LGB, which is higher 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 and	<input type="checkbox"/> High impact <input checked="" type="checkbox"/> Medium impact <input type="checkbox"/> Low impact <input type="checkbox"/> Opportunities  <b>Information used in assessment: See below data</b>
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<p>of those in scope, 14% of staff 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. There is some external evidence to suggest that LGBTQ+ communities experience more difficulties accessing jobs in traditional sectors (easier in creative sectors), so they may be affected adversely by redeployment. 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><b>tables</b></p>
<p><b>Consultation</b> <i>(list all stakeholders you have consulted with and record the scale of risk they have identified and/or any opportunities)</i></p>	

<p><b>5.DISABILITY</b> (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?)</p>	
<p><b>Assessment of Impact:</b> 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 9% of those potentially affected identify as having a disability. The proportion of People Services staff identifying as having a disability is 12%.</p> <p>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. There is some external evidence to suggest that people with disabilities (of any kind) face additional obstacles in the job market, especially if they women, from an under-represented ethnic group, or older. We will therefore rely on consultation to provide additional</p>	<p> <input type="checkbox"/> High impact  <input checked="" type="checkbox"/> Medium impact  <input type="checkbox"/> Low impact  <input type="checkbox"/> Opportunities         </p> <p><b>Information used in assessment: See below data tables</b></p>

Appendix 4 – Equality Impact Assessment

<p>information relating to the re-employability of this group and challenges they may face due to their disabilities.</p>	
<p><b>Consultation</b> <i>(list all stakeholders you have consulted with and record the scale of risk they have identified and/or any opportunities)</i></p>	

**6.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?)

<p><b>Assessment of Impact:</b> 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.</p> <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. 32% of staff impacted by these proposals identify as Christian, with fewer than five staff identifying as any other religion.</p>	<p> <input type="checkbox"/> High impact  <input type="checkbox"/> Medium impact  <input checked="" type="checkbox"/> Low impact  <input type="checkbox"/> Opportunities         </p> <p><b>Information used in assessment: See below data tables</b></p>
<p><b>Consultation</b> <i>(list all stakeholders you have consulted with and record the scale of risk they have identified and/or any opportunities)</i></p>	

**7.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><b>Assessment of Impact:</b> 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> <input type="checkbox"/> High impact  <input type="checkbox"/> Medium impact  <input checked="" type="checkbox"/> Low impact  <input type="checkbox"/> Opportunities         </p> <p><b>Information used in assessment: See below data tables</b></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</p>	



obtain supporting to confirm this.	
<b>Consultation</b> <i>(list all stakeholders you have consulted with and record the scale of risk they have identified and/or any opportunities)</i>	

<b>8.PREGNANCY AND MATERNITY</b> (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?)	
<b>Assessment of Impact:</b> 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.	<input type="checkbox"/> High impact <input type="checkbox"/> Medium impact <input checked="" type="checkbox"/> Low impact <input type="checkbox"/> Opportunities
<b>Consultation</b> <i>(list all stakeholders you have consulted with and record the scale of risk they have identified and/or any opportunities)</i>	<b>Information used in assessment: See below data tables</b>

<b>9.GENDER REASSIGNMENT</b> (someone proposing to/undergoing/undergone a transition from one gender to another or who identifies as non-binary)	
<b>Assessment of Impact:</b> It is unlikely that the transformation programme will have a direct or indirect negative impact on any staff falling into this category.  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.	<input type="checkbox"/> High impact <input type="checkbox"/> Medium impact <input checked="" type="checkbox"/> Low impact <input type="checkbox"/> Opportunities
<b>Consultation</b> <i>(list all stakeholders you have consulted with and record the scale of risk they have identified and/or any opportunities)</i>	<b>Information used in assessment: See below data tables</b>

## 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.**

- 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. We will ensure that there is sufficient notice provided of any exercise or application required, and that we are flexible with scheduling of any interviews.

7. Legal duties under the Public Sector Equality Duty - s149 Equality Act 2010 (How does this work help LFB to... )	
<b>Eliminate discrimination?</b> <i>This box is about any direct/indirect discrimination, considerations where bias may impact decisions/delivery, how to make processes avoid discrimination etc.</i>	Growing the ED&I space will allow for further investment into Inclusion and cultural change within the LFB
<b>Advance equality of opportunity between different groups?</b> <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>	The ED&I space will grow with further investment, which will allow for further engagement and activities with our Equality Support Groups
<b>Foster good relations between different groups?</b> <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.

**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 are on maternity, paternity or shared parental leave, or on long-term sick, they may not have the same opportunity to be engaged with	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.	Jamie Carter

**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


**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			

**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.

**Equalities profile of People Services**

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, with the addition of those affected by phase 2, this is increased to 130. 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 (121 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 (75 out of 121), and they account for nearly two thirds of all staff (62%).

	Male	Female	Total
Staff	46	75	121

### 2. Race (ethnicity)

Under half (41%) of PSD staff are from Black, Asian or another ethnically underrepresented group (50 out of 121).

	White	Ethnically underrepresented group	Total
Staff	71	50	121

### 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 (68 out of 121 and the highest concentration sitting in the age bracket between 40-49 (35 out of 121).

## Appendix 4 – Equality Impact Assessment

	FRS Staff
20-29	9
30-39	24
40-49	35
50-54	20
55-59	16
60+	17
<b>Total</b>	<b>121</b>

### 4. Sexual Orientation

There is a low number of staff working across PSD (8 out of 121) who have disclosed they identify as LGBTQ+, however the number is representative of the organisation as a whole. It should be noted that a significant number of staff (21 out of 121) 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 (12 out of 121) 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	109	12	121

### 6. Religion

The most common religion amongst staff within PSD is Christianity (36%), the next common is Hinduism (7%), with all others accounting for less than 7% 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	43
Hindu	8
Other Religions	8
No religion	35
Undisclosed	27
<b>Total</b>	<b>121</b>

## 7. Other Considerations

Further analysis will be completed 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.