

# Strategic Leadership Programme

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**Report to:****Date:**

Investment & Finance Board.....	25 July 2024
Commissioner's Board .....	14 August 2024
Deputy Mayor's Fire Board.....	27 August 2024
London Fire Commissioner .....	

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**Report by:**

Jerry Kirkby, Culture Transformation Programme Director and Mary-Anne Pilkington, Head of Leadership Academy

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**Report classification:**

For decision

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**For publication****Values met:**

Service  
Integrity  
Teamwork  
Equity  
Courage  
Learning

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I agree the recommended decision below.



**Andy Roe**  
London Fire Commissioner

**This decision was remotely  
Date signed on 2 October 2024**

# **PART ONE**

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

### **Executive Summary**

The Strategic Leadership Programme, aligned to the Values and Behaviours Framework, aims to address recommendations contained in the independent Culture Review and various HMICFRS reports to improve the trust and confidence in LFB senior leadership and create a more collective and collaborative leadership approach across all groups and teams.

This business case sets out the core aims, objectives and outcomes the Brigade expects to achieve. It also sets out two options for delivering the development programme (and a third 'do nothing' option).

Recommended approach:

Option 1: To procure an external provider to design and deliver the development programme. The external provider will provide an external perspective and meet industry best practice. Management of delivery would be undertaken by the Leadership Academy and overseen through the Leadership Model of Trust project, which sits under the Culture Transformation Programme.

Growth in the 2024/25 budget has already been approved by the Brigade and the Mayor, which specifically allocated funds for senior leadership development. Therefore, the purpose of the business case is to obtain approval to use the allocated budget and to proceed with the recommended option to procure an external provider to design and deliver a Strategic Leadership Development Programme.

## Recommended decisions

### For the London Fire Commissioner

The London Fire Commissioner agrees to commit revenue expenditure set out in Part 2 to deliver the Strategic Leadership Programme over the next three years, set out in more detail in the Business Case at Appendix 1.

#### **1 Introduction and background**

- 1.1** Since 2017 LFB has needed to respond to unprecedented challenges both operationally and culturally. The Grenfell Tower Inquiry, the independent Culture Review and a number of reports from His Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) identified the need for the Brigade to develop leadership that could be trusted, both by the public we serve and the staff who work for LFB. The LFB Staff Survey results reinforced the need to improve leadership and the way senior colleagues behave and lead the Brigade.
- 1.2** Up to 2022 there had been limited leadership learning and development within LFB. The priority had been operational training. In 2022 the Brigade launched three leadership programmes aimed at junior and middle to senior leaders. The courses are being delivered by Babcock, LFB's training provider, and the Leadership Academy with some specialist support for Equality, Diversity and Inclusion modules. These are currently being delivered with evaluation showing positive impact.
- 1.3** In early 2023 the Brigade commissioned leadership consultants to work with the Commissioner, Directors and members of the Top Management Group (TMG) to assess the future requirements for the most senior leaders of LFB. They conducted six half day workshops and one-to-one meetings and coaching sessions with the Commissioner and all Directors. In addition, they held two full day workshops with members of the TMG exploring themes around cultural leadership and their future needs and requirements. Between the two TMG sessions, those who attended the workshops spoke to all of their TMG colleagues to gather feedback on existing and future development needs and how best to bring about culture transformation. The consultants also reviewed existing materials, resources and the programmes to support the leadership development of Directors and TMG.
- 1.4** The assessment concluded that although there were some generic leadership programmes, there was little development activity targeted at Directors or TMG. Those consulted expressed the current leadership development provision at this level

was disjointed, provided on an ad-hoc basis and with little evidence of positive impact at team or organisational level. The reviews found it was vital for greater clarity about the composition of TMG, finding the current number of approx. 70 members to be too large. They proposed changing the name to Strategic Leadership Team (SLT) and reducing the size. They found leaders needed greater understanding of their collective and wider organisational responsibilities beyond their specific remit or job role. There was a need to establish three different leadership communities (Commissioner, Directors and TMG/SLT) to learn and lead together. The current provision emphasised individual leadership and whilst this is useful, further development provision should be focused on cultivating a collective leadership approach with leaders collaborating to lead LFB.

- 1.5** Following this work LFB established a Working Group consisting of 12 TMG members from operational, control and FRS groups and colleagues from the Culture Transformation programme team and the Leadership Academy. The group developed the specification of the proposed development programme and supporting business case. This sets out two options for delivering a Strategic Leadership Programme, as well as a third option of 'do nothing'. Directors have reviewed the options in relation to the composition of a newly formed SLT and propose reducing the number to approximately 40 members.
- 1.6** TMG will remain an important leadership group. The current monthly briefings and leadership development opportunities will continue. TMG members will continue to be invited to the keynote speaker sessions introduced in 2023 and will be able to access the coaching and mentoring support available from both LFB and other organisations such as the National Fire Chiefs Council, Greater London Authority and Westminster Industry Group. In addition, the learning and development provision through the Windsor Leadership programme is open to all TMG members. Investment is being made in the provision of management training and bespoke learning and development aimed at FRS staff which all TMG FRS staff will be able to access.
- 1.7** The recommended option is to procure an external provider to design and deliver the programme. LFB do not have the skills and resources to design and deliver this type of training, and should an in-house option be required then significant investment would be needed in year one to develop this capability. The management of the delivery of an external sourced provision would be undertaken by the Leadership Academy and be overseen through the Leadership Model of Trust project which sits in the Culture Transformation programme. Funding has been allocated in the 2024/25 budget and permission is sought to proceed to tender via an approved framework of suppliers.
- 1.8** There is a clear opportunity over the next 2 to 3 years to strengthen the collective leadership function of the Brigade. This business case sets out how the Brigade can work towards achieving this through the delivery of a 'Strategic Leadership Programme'.

## **2 Objectives and expected outcomes**

### **2.1 Aims:**

- Strengthen relationships within the Strategic Leadership Team, driving active collaboration and cooperation.
- Build strong and accountable leadership communities across the Brigade.
- Build leadership skills and explore and understand how they are different to management skills.
- Actively consider and support succession planning.
- Help resolve complex problems and evolve working cultures, together.

### **2.2 Objectives:**

- To embed constructive disagreement, negotiation and informed decision-making into collective leadership practice across the London Fire Brigade.
- To strengthen relationships within the Strategic Leadership Team, empowering groups to collaborate more effectively, demonstrate consistency in behaviours, values and vision as a means of driving organisational effectiveness.
- To work collaboratively to build a better understanding of, and shared confidence in the multiple leadership roles and responsibilities across the LFB.
- To develop sustainable mechanisms, such as evaluation processes, workshop storyboards, governance processes and clear objectives, for building skills, knowledge and experience of collective leadership in a complex organisation in a constantly changing environment.
- For future staff surveys to measure positive change in leadership and management and in understanding and being motivated by the senior leader's communication of their vision for LFB.
- To build a collective and collaborative strategic leadership group with a consistent style of behaviours that demonstrate the LFB Values leading to increased psychological safety and resultant improvement in wellbeing and performance.
- Personalised development, specific training needs (including support for those that are neurodiverse), objective setting, and peer to peer learning.

### **2.3 Outcomes:**

- A strengthened collective leadership function with a clear sense of shared purpose as to their roles and responsibility as a strategic leadership team.
- A new set of relationships based on mutual trust and respect where individuals feel a strong sense of belonging and where diverse perspectives are encouraged.
- A leadership culture which creates the right conditions for healthy

challenge, appropriate risk-taking and collaboration.

- A culture of on-going learning, where the leadership community take responsibility for empowering others across the Brigade. A clear sense of succession planning opportunities within LFB.
- Increased creativity and innovation across the leadership community, driving effectiveness.

### **3 Values Comments**

**3.1** The LFC notes the Fire Standards Board requirements around adopting and embedding the Core Code of Ethics at an individual and corporate level. Following extensive engagement, the LFC has introduced Brigade values which build on and do not detract from the Code of Ethics.

**3.2** The proposal has direct relevance to all of LFB Values and these will form a core part of the programme.

**3.3** The Brigade values are:

- Service: we put the public first
- Integrity: we act with honesty
- Teamwork: we work together and include everyone
- Equity: we treat everyone fairly according to their needs
- Courage: we step up to the challenge
- Learning: we listen so that we can improve

### **4 Equality comments**

**4.1** 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.

**4.2** 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.

**4.3** 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.

- 4.4** 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.
- 4.5** 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 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.
- 4.6** 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.
- 4.7** 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.
- 4.8** An Equality Impact Assessment has been conducted for the current TMG development programme. This is attached within the Business Case. This will be updated as the programme develops and composition is confirmed.

## **5 Other considerations**

### **Workforce comments**

- 5.1** Prospect have been engaged and are supportive of investment in senior staff leadership development and the need to reduce the size of a future SLT. They have requested information on the composition and rationale for inclusion.

## **Sustainability comments**

**5.2** The sustainability impact assessment was signed off on 30 May 2024 (Appendix 3).

## **Procurement comments**

**5.3** LFB Procurement team have been engaged in developing the business case and advising on potential supply routes. Following research, they propose if option 1 is chosen the procurement should be via a Public Contracts Regulation 2015 compliant framework run by YPO. This will give LFB a wide range of suppliers to review submissions from (approx. 17). This ensures a fair comparison in regard to capability/commerciality and taking into consideration our commitment for Responsible Procurement, including Sustainability, CSR and Social Value.

**5.4** Procurement have proposed a Tender Panel is established to help inform the process and assess submissions. It has been agreed this will consist of the following:

Cliff Morton, Interim Chief HR Officer  
AC Keeley Foster, Leadership Model of Trust Sponsor  
Lewis Coakley, Head of Culture and Organisational Development  
Mary-Anne Pilkington, Head of Leadership Development  
Nadia Bob-Thomas, Head of Equality, Inclusion and Diversity  
Adrian Bevan, Prospect representative

**5.5** The assessment criteria will be agreed with Procurement to ensure appropriate weighting is given to the quality of the product and cost considerations.

## **Communications comments**

**5.6** The Communications Team will inform the Comms Strategy once the detail of the Leadership Development Programme emerges through the design stage.

**5.7** Comments from the Communications Team:

Strategic Leadership Development - communications plan outline:

- Brief senior leaders in person to gain their engagement in the process
- Agree timing and prioritization for leadership development actions
- Agree visual identity for the development activity in line with LFB Values 'learning' value
- Highlight materials available to leaders via our normal communication channels on Hotwire and via TMG sessions.

## **6 Financial comments**

**6.1** This report seeks approval to commit revenue expenditure to deliver the Strategic Leadership Programme, funded from investment growth approved as part of the



2024/25 budget. Further information on costs and funding is provided in part two.

## **7 Legal comments**

- 7.1** This report seeks approval to commit revenue expenditure on goods and services set out in more detail in Part 2 to deliver the Senior Leadership Programme.
- 7.2** Under section 9 of the Policing and Crime Act 2017, the London Fire Commissioner (the "Commissioner") is established as a corporation sole with the Mayor appointing the occupant of that office. 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.
- 7.3** By direction dated 1 April 2018, 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...". Accordingly, the revenue expenditure set out in more detail in Part 2, requires prior approval.
- 7.4** The statutory basis for the actions proposed in this report is provided by sections 7 and 5A of the Fire and Rescue Services Act 2004 ("FRSA 2004"). Under Section 7 (2)(a) FRSA 2004 the Commissioner has the power to secure the provision of personnel, services and equipment necessary to efficiently meet all normal requirements for firefighting and section 5A allows the Commissioner to procure personnel, services and equipment they consider appropriate for purposes incidental or indirectly incidental to their functional purposes.
- 7.5** General Counsel advises that all proposed tenders (together with any modifications to any existing contracts) required to deliver the Senior Leadership Programme must be carried out in accordance with the Public Contracts Regulations 2015 ("the Regulations"), together with the London Fire Commissioner's Scheme of Governance (Part 3 Standing Orders Relating To Procurement).
- 7.6** Delivery of the Senior Leadership Programme will enable the Brigade to make continuous improvements, enable it to operate efficiently and effectively, and build trust and confidence.

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: Yes.

The rationale for non-publication is that we will be entering a procurement exercise.

List of appendices

Appendix	Title	Open or confidential*
<b>1</b>	Strategic Leadership Programme Business Case	Confidential
<b>2</b>	Equality Impact Assessment	Open
<b>3</b>	Sustainability Impact Assessment	Open
<b>4</b>	Data Protection Impact Assessment	Open



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## Part 1: Equality Impact Assessment – submitter to complete.

Before carrying out an Equality Impact Assessment (EIA), you should familiarise yourself with the guidance notes (see Appendix) and our other resources located within the [EIA section on Hotwire](#)

An EIA should be carried out whenever you are starting (or reviewing) any major new activity/programme/policy/project/strategy/campaign \*, or where you propose changes or a review of the previous one.

\*In this document, any kind of activity/programme/policy/project will be called an ACTIVITY for an easy read, while you specify the type of your event from your end.

**The purpose of an EIA is to meet and justify the legal obligation required under the [Public Sector Equality Duty \(PSED\)](#), namely, the ‘DUE REGARD’ that documents that your activity/programme/policy will:**

- **1. eliminate discrimination, harassment, and victimisation**
- **2. advance equality of opportunity**
- **3. foster good relations between people who share a relevant protected characteristic and people who do not share it.**

In the EIA, you need to show that your activity meets the 3 conditions of the due regard, as listed above, and provide any relevant information showing that your activity caters for people with protected characteristics (where applicable), but also that it promotes equality and eliminates potential discrimination and offers additional opportunities to advance equality.

Where you identified any possible negative impacts on individuals and groups with protected characteristics, you need to complete a mitigating action plan (Section H below). After your mitigating action plan has been implemented, you need to inform the EAI Team by sending the same form again with the notification of the date when the mitigation action plan was completed.

### A. Name, goal and the expected outcomes of the programme/ activity

Senior Leadership Development Programme

The Senior Leadership Development Programme consists of a series of external speaker talks and workshops over the course of 2024 and 2025. These sessions will provide an opportunity for your development, by hearing about the lived experiences and unique perspectives of the speakers and reflecting on how this could be applied to your own place of work.



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The events typically run from about 9:30 or 10am – 12pm on the first Thursday of every month and are combined with Communications TMG monthly briefings (with few exceptions).

Following April 2025, the new Senior Leadership Development Programme targeted to the Commissioner and his Chief of Staff, Directors and a select group of Heads of Service, will be launched, depending on the business case approval following the tender process. The EIA will be revised once the design is completed.

Please find attached a copy of the agenda for the programme.

#### **B. Reason for Equality Impact Assessment**

A new activity

#### **C. Names of the team responsible for the programme/ activity**

##### **Responsibility for the EIA:**

Name: Aishwarya Veeravalli

Job title: Leadership Development Co-ordinator

Department: Leadership Academy

##### **Responsibility for the whole activity:**

Name: Mary-Anne Pilkington

Job title: Head of Leadership Development/ Leadership Academy

Department: Learning and Professional Development – The Leadership Academy

#### **D. Who is this activity for, who is impacted by it (all LFB staff, specific department, external communities)**

1. The Senior Leadership Team (incorporating the Commissioner and Directors)
2. LFB staff, specifically the Top management Group, which includes the following groups:
  - Top Management Group Plus – TMG A, TMG B, TMG C
  - Group/Borough commanders
  - Deputy Assistant Commissioners
  - Assistant Commissioners
  - Heads of Service
  - Commissioner
  - Chief of Staff



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### E. What other policies/documents are relevant to this EIA?

The following policies/ documents are relevant to this EIA:

- [LFB Values](#)
- [Togetherness Inclusion Policy](#)
- [Learning Support \(including Workplace Passport\)](#)
- [ESG – Equality support groups](#)
- [Managing stress within the LFB policy](#)

### F. Equality and diversity considerations

Describe the ways how your activity meets the conditions of the due regard of the PSED and how LFB employees and communities of London may be affected by your activity, especially those ones with protected characteristics. Explain whether your programme/ activity may disproportionately affect any group named below?

#### Protected characteristics Equality Act 2010:

- Age
- Disability/Barrier
- Gender and gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race including ethnicity and nationality
- Religion or belief
- Sexual orientation

Also considering:

- Caring responsibilities
- Socio-economic backgrounds

At the end of your explanation, please, list the sources you have used.

It is envisaged that the programme is inclusive in its approach, and will not have any direct adverse impact on LFB staff or London's communities. The Senior Leadership Development Programme **does not** lead to discrimination, harassment, victimisation, or less favourable treatment of people with protected characteristics.

Content:

The external speaker deliveries are planned and decided by the external speakers and are screened by the Leadership Academy to ensure that their language is inclusive and in line with the LFB Values and Togetherness Strategy.

Venue:



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To ensure that we use a central location for the workshops and talks, the chosen venue for the TMG Development workshops are on the Ground Floor rooms at the Headquarters. In line with LFB-agreed protocols, it includes all required amenities and facilities such as gender neutral/ accessible toilets, refecation spaces, sufficient ventilation, good lighting, noise levels, parking spaces, video and equipment, and central location.

Along with the joining instructions, delegates are informed about the course content and topic prior to the workshop to ensure that there are no potential surprise triggers during the workshop. They are also able to view all other invitees and attendees to ensure they feel comfortable at the event.

We anticipate no disproportionate impact and low risk to individuals with protected characteristics under the 2010 Equality Act.

Please see below:

- Age – Low risk
- Disability/ Barrier – Low risk
- Gender and Gender reassignment – Low risk
- Marriage and Civil Partnership – Low risk
- Pregnancy and Maternity – Low risk
- Race including ethnicity and nationality – Low risk.
- Religion or belief – Low risk
- Sexual Orientation – Low risk
- Socio-economic backgrounds – Low risk
- Caring responsibilities – Low risk

Data for the assessment was taken from latest equalities data (as of March 2024):

- Disability

	Disability
FRS	130 (13% of FRS)
Control	15 (13% of Control)
Operational	360 (8% of Operational)
Total	505 (9% of LFB)

- Gender:

	Female	Male
FRS	517 (51% of FRS)	496 (49% of FRS)
Control	87 (75% of Control)	29 (25% of Control)
Operational	485 (10% of Operational)	4209 (90% of Operational)
Total	1089 (19% of LFB)	4734 (78% of LFB)



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- Race:

	White	Underrepresented ethnic group	Not Provided	Prefer not to say
FRS	650 (64% of FRS)	310 (31% of FRS)	48 (5% of FRS)	5 (.5% of FRS)
Control	90 (78% of Control)	24 (21% of Control)	2 (2% of Control)	0 (0% of Control)
Operational	715 (15% of Operational)	715 (15% of Operational)	134 (3% of Operational)	47 (1% of Operational)
Total	4538 (78% of LFB)	1049 (18% of LFB)	184 (3% of LFB)	52 (1% of LFB)

- Sexual Orientation – LGB

	LGB
FRS	71 (7% of FRS)
Control	10 (9% of Control)
Operational	272 (6% of Operational)
Total	353 (9% of LFB)

### G. Evidencing Impact

Please answer the following four questions:

**G1.**

**a. List all the internal/external stakeholders and organisations you have consulted or contacted regarding your activity, along with the insights gained from these interactions?**

**b. Explain how you have gained and evaluated your insights and whether you intend to conduct a follow-up or seek post-activity feedback from those stakeholders?**

a.

An external consultancy worked with the TMG to identify and report on the development needs of this cohort. This was done in conjunction with feedback from the staff survey, Culture Review, HMICFRS consultation and CRMP. The outcomes from the report have formed the basis of the specification for the business case for the senior leadership development programme.

The Inclusion Team are members of the TMG Working Group that reviewed and agreed the specification of the programme. The TMG Working Group have been invited to review and comment on the draft business case for the senior leadership development programme. The TMG Working Group will monitor the development and impact of the senior leadership development programme.



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Due to delays in defining the specifications for the senior leadership development programme, the engagement with the Unions and the ESGs are scheduled to take place.

b.

Gained insights through the external consultation – Deeds and Words report, which was created through consultation with TMG.

The report on the development needs of the TMG cohort has been evaluated and formed the basis for defining the specification for the senior leadership development programme. An evaluation process (Kirkpatrick evaluation process) will be launched in conjunction with the senior leadership development programme roll-out. Post Activity feedback will be in the form of Kirkpatrick L1,2,3 and 4, including focus groups and reflective sessions post external speakers' inputs.

The evaluation feedback will be used to review the programme and its impact on developing the effectiveness of the senior leadership team against the expected outcomes and staff survey feedback.

**G2. Have you faced any gaps in evidence for assessing your activity's impact, and if so, can you justify proceeding with the EIA without addressing them or are you considering a mitigation action plan?**

No, we have faced no gaps and were able to fully assess and capture the impact of the Senior Leadership Development Programme on the attendees, both with and without protected characteristics.

**G3. What adjustments have you considered for people with protected characteristics, and how does your activity promote equality of opportunity and caters for equity for them?**

We anticipate that there will be no disproportionate impact on staff with protected characteristics due to sufficient adjustments made to accommodate each member of staff across the London Fire Brigade.

We recognise that there might be a disparity in the age and gender of those in TMG/ senior leadership positions. To tackle this and promote equality of opportunity, we invite FRS Gs, Group and Borough commanders, and Senior control commanders to the workshops and talks as well. This will help provide them with a bespoke development opportunity, prior to them acting up/ being in development.

Disability/ Barrier – All venues are thoroughly vetted to ensure they are accessible for staff with disabilities. The content has been designed to include sufficient graphics, visual cues,



aid memoirs, and less text to support different learning styles and speeds, in line with LFB requirements.

- For internal deliveries, the slides have been adapted to ensure accessibility and inclusivity for neurodivergent members of staff. The formats have been adapted – including colour schemes, visual aids (such as flowcharts and diagrams), font sizes, or other design elements have been used to ease learning.

Gender and Gender reassignment – The sessions use inclusive language while delivering and avoid unnecessary ‘gendered’ terms in content and communication to ensure no member of staff feels excluded (binary, non-binary, and trans people).

- The venue for the sessions accessible toilets that are gender neutral and can be accessed by delegates.
- The speakers and facilitators have been requested to use gender neutral terms and avoid gendered terms and phrases such as ‘ladies and gentlemen’ or ‘boys and girls’ or ‘fireman’ to avoid bias. The same is ensured in all programme content. Accordingly, speakers and facilitators will challenge inappropriate and non-inclusive language.

Marriage and Civil Partnership – Workshop content and delivery will apply equally to all staff members we engage with regardless of their marital or civil partner status. Through the use and promotion of inclusive language and inclusive leadership, there is a positive impact on this group.

Pregnancy and Maternity – The programme is modular by design and has been scheduled into the diaries at the beginning of the year. This promotes flexibility and accommodates different timings for childcare responsibilities. Moreover, the talks and workshops are standalone, meaning that there is no need to attend these sessions in any particular order.

Race including ethnicity and nationality – All eligible members of staff from all ethnicities, races, and nationalities and invited to attend the workshop.

Religion or belief – The LFB headquarters has multiple quiet spaces for reflection, to support individuals with religious requirements.

Sexual Orientation – As above, the senior leadership development speakers and workshop facilitators only use inclusive language throughout to prevent any form of bias or discrimination.



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Socio-economic backgrounds – As above, the workshops and talks run centrally (at Union Street/ Headquarters) to provide easy access to individuals across all 4 areas of London.

Caring responsibilities – The workshops have a late start and early finish as they run from 9:30 or 10AM – 12PM, which provides ample time for childcare responsibilities in the morning/ afternoon. Delegates are given notice very far in advance to allow for alternative commitments and additional responsibilities, which may require cancellation.

**G4. How do you communicate the activity to those involved, especially with protected characteristics, and have you considered diverse formats such as audio, large print, easy read, and other accessibility options in various materials?**

The senior leaders eligible for the workshops and talks are emailed ahead of time, and their executive assistants are informed as well.

Prior to the event, all elected delegates are offered the opportunity to share their any and all specific requirements, wellbeing requirements, and disabilities they need support with.

Delegates are also welcome to share their Workplace Assessment Passport with further details on any requirements they would like to share for a set-time period.

The slides of the workshops and external speaker talks are reviewed by a Leadership Academy team member to ensure that they are suitable to the LFB neurodiversity format requirements and standards, [as described in this link](#). In case they are not, the slides will be adapted to ensure accessibility and inclusivity for neurodivergent members of staff. This means, the formats will be adapted, including the colour schemes, visual aids (flowcharts, diagrams, etc.), font sizes, and other design elements that can ease learning.

In the case of reported neurodiversity, hard copies of appropriate formats will also be provided so delegates can read the slides and handouts. Similarly, the pace will be adapted (slowed down) to enable reading, and each slide will include sufficient visual cues without too much text.

**H. Mitigating action plan (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	Action being taken to mitigate or justify	Lead person/department responsible for the mitigating action
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impact		
1.		
2.		
3.		
4.		
<b>I. Signed by the Submitter</b>		
<b>Name:</b> Mary-Anne Pilkington <b>Rank/Grade:</b> FRS G <b>Date:</b> 21 <sup>st</sup> May 2024		



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## Part 2: Inclusion team to complete - feedback and recommendations

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### J. EIA Outcomes

Select one of the four options below to indicate next steps:

**Recommendation 1:** No change required – the assessment showed that the activity is/will be robust.

### K. Feedback

Please specify the actions required to implement the findings of this EIA and how the programme/ activity's equality impact will be monitored in the future. It may be helpful to complete the table.

Recommendation 1: No changes are required, as the assessment indicates that the activity is robust.

For the Senior Leadership Development Programme, the EIA led to Recommendation 1, suggesting that no changes are necessary due to the anticipated robustness of the activity. This activity is notable for its comprehensive consideration of diverse colleagues, reflecting a strong commitment to operational effectiveness. It greatly promotes compliance with the Equality Act 2010 and demonstrates due regard for the Public Sector Equality Duty (PSED).

For future EIA submission:

Utilise HotWire resources library for Equality, Diversity, and Inclusion updates. This repository provides valuable information on data and supporting charities.

Link: [Equality, Diversity and Inclusion Resources](#)

### L. Sign off by EIA Inclusion team

Date: 13/06/2024

# Sustainable Development Impact Assessment Checklist

**Project Name/ Policy Name & No:** Leadership Academy

**Contact Person:** Nathan Hobson

**Date completed:** \_\_\_\_\_

Please send through the completed checklist with a copy of the project PID or the draft policy to [environment@london-fire.gov.uk](mailto:environment@london-fire.gov.uk). For existing policies undergoing minor amendments, please send through a marked-up copy of the policy, with the original SDIA.

Other impact assessments completed		Yes	No		
1. Has an Equalities Impact Assessment been completed?		<input checked="" type="checkbox"/>	<input type="checkbox"/>		
2. Has a Health, Safety and Wellbeing assessment been completed? <i>We were informed that a HSWIA is not required for our current Leadership Academy programmes.</i>		<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Environmental Impacts					
3. Will this consume any of the following (please tick those that apply and state how and if this would increase or decrease our consumption):					
Gas	<input type="checkbox"/>	Electricity	<input checked="" type="checkbox"/>	Water	<input checked="" type="checkbox"/>
Petrol or diesel	<input checked="" type="checkbox"/>	Hazardous chemicals	<input type="checkbox"/>	Other natural resources e.g., timber	<input type="checkbox"/>
<b>Comments:</b>					

Due to the programmes requiring physical deliveries, both LFB staff as well as our Leadership Academy facilitators use electricity (for Electric vehicles), petrol, or diesel for travels across London. However, in the attempt to minimise pollution, the facilitators use public transport and cycle to their venues where possible.

For Colin Townsley 2 workshops, Establishment and Performance team schedule 3-4 watches with roughly 2 appliances each to attend at a centralised venue. This helps reduce electricity wastage at multiple venues as we only use one of the large display screens to display content for all watches. As the appliances need to travel to the venue, we ensure that the centralised hub/station with closest proximity to all allocated watches is selected to minimise travel distance.

Similarly, the Gillian Tanner, Frank Bailey, and training for trainers' workshops are run at centralised venues, and attendees can choose their preferred locations (in most cases), which helps reduce any additional unnecessary travel.

The coaching and mentoring and deaf awareness workshops are designed to be voluntary, where staff can opt to attend a workshop based on their preferences (timings, location, etc.). They are all held at LFB venues (either at Headquarters or area hubs) to reduce any additional or unusual impact on their workplace travel. Similar to above, as all attendees attend the session in one venue (one room), we will only use one large screen to display content, thereby significantly reducing electricity and energy consumption.

Similarly, Leadership Academy facilitators travel to individual watches to deliver LFB Values sessions to avoid any of the appliances travelling for longer periods of time for a singular workshop. This thereby minimises the use of Electricity (for electrical vehicles), Petrol, and Diesel of an entire appliance having to travel for a workshop.

The NFCC Supervisory Leadership Development Programme and Middle Leadership Programmes are run virtually, which require a certain amount of electricity to run the monitors and laptops to view the content.

With regards to Learning Support, majority of the work happens online – from email referrals, learning support authorisation forms, diagnostic screening, teams' meetings, external support interventions (GeniusWithin), workplace passports, etc. Hence, electricity will be used to work on the LFB-monitors and laptops, but will not result in any additional wastage of resources where possible.

In terms of water, we provide refreshments in most of our workshops, which requires hot water for teas, coffee, etc.

4. Will this produce or reduce our production of (please tick those that apply and describe what and how):

Non-hazardous waste	<input type="checkbox"/>	Hazardous waste (see PN 862)	<input type="checkbox"/>	pollutants to air, land, or water?	<input checked="" type="checkbox"/>
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**Comments:**

Our programmes produce minimal production of pollutants to air, land, or water.

The strategic resource schedule for the Colin Townsley 2 programme with about 3-4 watches per session who are allocated to attend each session. As the appliances need to travel to the venue, we ensure that the centralised hub/station with closest proximity to all allocated watches is selected to minimise travel distance.

For the Gillian Tanner, Frank Bailey, and Training for Trainers programme, staff are allocated on an individual-basis and travel to an individual venue, using their own forms of transportation or public transportation. To minimise excessive travel, all venues are selected to be central and close to Union Street headquarters, which would therefore ensure that there will be no unusual increase in production of pollutants. In addition, for Frank Bailey Leadership Programme, individuals are provided with the opportunity to choose their preferred venue which minimises excess travelling.

The Values workshops are held in their own stations for each watch and hence does not require an appliance traveling long distances to attend the session. The facilitators travelling to the watches try and use public transport and cycling where possible to avoid excessive air pollution.

Similar to the above, the coaching and mentoring workshops and deaf awareness workshops are held at centralised hubs or at Headquarters, and attendees are able to choose their preferred location for attendance. Similarly, as the TMG workshops or bespoke deliveries are held at headquarters, there will be no additional or unusual impact on workplace travel.

The learning support team deliver presentations at Barking to new trainee firefighters as part of the FFD programme. As the facilitator aims to travel using Public transportation where possible to travel to the venue, this minimises the release of pollutants to the air.

5. Will this impact (positively or negatively):	Yes	No
a. Operational/business travel by staff	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Travel/deliveries by our suppliers	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Environmental protection at incidents	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. a Site of Special Scientific Interest	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Gardens or other wildlife at stations/brigade sites (e.g., nesting birds or bats)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Comments:**

The strategic resource schedule for the Colin Townsley 2 programme with about 3-4 watches per session who are allocated to attend each session. As the appliances need to travel to the venue, I have selected 'Yes' above for the operational travel by staff section.

<b>Procurement</b>	<b>Yes</b>	<b>No</b>
6. Will this result in the purchase of goods, services or works or influence how they are procured?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Is this for a purchase of greater than £1m?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Will this use/result in a tender for manufactured goods such as electronics, textiles, and building materials?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Will this service require low skilled/low paid employees?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. Will the goods consume utilities or consumables?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j. Does this involve major works taking place?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
k. If so are BREEAM and Ecological surveys required?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
l. Will this support future cost avoidance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

m. Could all or part of the purchase be provided by small or local businesses?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
n. Could this be delivered by a voluntary/community sector organisation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
o. Has a Request for Tender been submitted to Procurement through hotwire?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Comments:</b> NA		

**For the SD Team to complete:**

Policy sustainability risk rating: Low

Inputs/outputs/ impacts to address in Full SDIA: A full SDIA is not required.

Date completed: 30/04/2024



# Data Protection in the workplace

## Data Protection Impact Assessment (DPIA)

### Introduction

This DPIA template and guide is adapted from the *Information Commissioner's (ICO) code of practice for conducting privacy impact assessments*<sup>1</sup> and will assist managers and staff to identify and mitigate against any data protection related risks arising from a new processing system, process or technology, which may affect the Brigade or the individuals we engage with.

### Background

New data protection laws came into force on 25 May 2018<sup>2</sup>. These new laws expand the rights of individuals to control how their personal data is collected and processed, and places a range of new obligations on the Brigade to be more accountable for the processing of personal data. Many of the changes simply build on the data protection arrangements that have been in place since 1998.

In the course of their work, LFB staff are required to collect and use certain types of information about people, including '[personal data](#)' as defined by GDPR. This information can relate to members of the public, current, past and prospective employees, suppliers and others with whom staff communicate.

One of the new data protection requirements is the need for the Brigade to conduct a DPIA whenever there is a change that is likely to involve a new use or significantly change the way in which personal data is handled, for example a redesign of an existing process or service, or a new process or information asset being introduced. A key factor is to reduce the amount of data processed to comply with our data protection obligations and meet individuals' expectations of privacy.

### What is a DPIA?

A DPIA addresses the impacts of data processing on individuals' privacy. It is the basis of a "[privacy by design](#)" approach, to help meet privacy and data protection expectations of customers, employees and other stakeholders. A DPIA is intended to be prospective and proactive and should act as an early warning system by considering privacy and compliance risks in the initial design and throughout the project.

Privacy, in its broadest sense, is about the right of an individual to be left alone. It can take two main forms, and these can be subject to different types of intrusion:

- **Physical privacy** - the ability of a person to maintain their own physical space or solitude. Intrusion can come in the form of unwelcome searches of a person's home or personal possessions, bodily searches or other interference, acts of surveillance and the taking of biometric information
- **Informational privacy** – the ability of a person to control, edit, manage and delete information about themselves and to decide how and to what extent such information is communicated to others. Intrusion can come in the form of collection of excessive personal information, disclosure of personal information without consent and misuse of such information. It can include the collection of information through the surveillance or monitoring of how people act in public or private spaces and through the monitoring of communications whether by post, phone or online and extends to monitoring the records of senders and recipients as well as the content of messages

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<sup>1</sup> <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/accountability-and-governance/data-protection-impact-assessments/>

<sup>2</sup> General Data Protection Regulation (GDPR) and the Data Protection Bill 2018

## Who is responsible for completing a DPIA?

Completing DPIAs is the responsibility of the project manager or process owner in collaboration with Information Management Information Access Team. The finalised DPIA will be signed off by the Brigade's Data Protection Officer (David Wyatt) consulting with the relevant HoS as appropriate.

## Data Protection Assessment (DPIA) Pre-screening questionnaire

<b>Project name or details of process change</b>	Workstreams under leadership Academy <ul style="list-style-type: none"> <li>• Coaching and Mentoring Workshops</li> <li>• Colin Townsley Leadership Programme</li> <li>• Gillian Tanner Leadership Programme</li> <li>• Frank Bailey Leadership Programme</li> <li>• NFCC Supervisory Leadership Development Programme Pilot</li> <li>• NFCC Middle Leadership Programme Pilot</li> <li>• TMG Leadership Development Programme</li> <li>• LFB Values workshops</li> <li>• Deaf Awareness workshops</li> <li>• Learning Support</li> <li>• Training for Trainers (Operational staff only)</li> </ul>
<b>Project manager or process owner</b>	Mary-Anne Pilkington
<b>Department/Team</b>	Leadership Academy
<b>Date</b>	
<b>Signature</b>	

**If the answer to any of the following questions are 'yes' you will need to complete a full DPIA.**

Please keep a copy of this form with your project documentation and submit a copy to the Information Management Team at [InformationAccess@london-fire.gov.uk](mailto:InformationAccess@london-fire.gov.uk)

	Yes	No
Will the project involve the collection of new information about individuals?	Yes	
Will the project compel individuals to provide information about themselves?		No
Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?	Yes	
Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used for?		No
Does the project involve you using new technology which might be perceived as being privacy intrusive? For example, the using of biometrics or facial recognition.		No
Will the project result in you making decisions or taking action against individuals in ways which can have a significant impact on them?		No
Is the information about individuals a kind particularly likely to raise privacy concerns or expectations including special categories data? For example, health records, criminal records or other information that people would consider to be particularly private.		No
Will the project require you to contact individuals in a way which they may find intrusive?		No
Will the project introduce new facilities that might be used by individuals in the institution to gather, process, analyse or share personal information in ways that would previously have required specialist support?		No

Will the project involve the processing of personal data by third parties (third parties would include all cloud based services)?	Yes	
Will the project expose personal data to elevated levels of security risks?		No
Are stakeholders likely to have privacy concerns about the project?		No

## Data Protection Assessment (DPIA) Template

### Full assessment

For advice and guidance on data protection issues, contact the information access team within the information management division. This template should be completed at the start of any major project involving the use of personal data, or if you are making a significant change to an existing process. The final outcomes should be integrated back into your project plan.

## Step 1: Identify the need for a DPIA.

Explain broadly what project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. Summarise why you identified the need for a DPIA. [If this template is being used for a project that is not a Brigade Project, then you should also explain here what the project aims to achieve and what the benefits will be to the organisation, to individuals and to other parties.]

The workstreams covered under the leadership academy include the following:

1. Coaching and Mentoring: The purpose of the project was/is to develop a Leadership Academy Coaching and Mentoring programme for all three staff groups. This will support the London Fire Brigades vision to be a dynamic, forward-looking organisation of fully engaged people at the centre of the communities we serve, adapting to the changing needs of London. All staff have access to the program, but particular attention is paid to groups currently underrepresented at senior ranks and grades in our organisation regarding accessibility. This has been done by working with the equality support groups, communications, and awareness raising across the brigade. This will continue going forward.
2. Colin Townsley Leadership Programme: The Colin Townsley is a set of 4 one-day workshops designed around the LFB Values, key insights, and tools around emotional intelligence, developing skills for dealing with difficult conversations, and navigating change. This is a thought-provoking programme that gives you some space for self-reflection, learning, and networking with your peers across the wider organisation.
3. Frank Bailey Leadership Programme: The purpose of this programme is to provide a leadership development programme for middle managers across all three staff groups. A five-module middle leadership programme, centered on our LFB Behaviours, designed to develop the LFB's leadership capability and support our staff to be the best leaders that they can be. We have worked with our own inclusion team as well as two external organisations (GBS and Radius Networks) to design the content around:
  - a. Leading Oneself – GBS
  - b. Leading Teams – GBS
  - c. Leading with Courage and Authenticity – Radius Networks
  - d. Leading Individuals – GBS
  - e. Influence – GBS
4. Gillian Tanner Leadership Programme:

- a. Leading self and others with compassion – Leaders who can practise honest self-assessment, manage their emotions, and understand their impact on others.
  - b. Leading self and others through togetherness – Leaders who can practise behaviours that create a culture of inclusion, teamwork, and empowerment and coaching.
  - c. Leading self and others through accountability – Leaders who can practise accountable behaviours that create an environment where everyone feels responsible and takes ownership for their actions.
5. Middle Leadership Programme: The self-directed development programme is designed exclusively and collaboratively between the NFCC and CMI. It is a natural progression from the NFCC Supervisory Leadership Development Programme (SLDP) and offers middle leaders a wealth of support for their day-to-day leadership and management activities, along with access to materials to address ongoing development needs. The programme has been designed exclusively to develop knowledge, skills, and behaviours for every existing, new, and aspiring supervisory leader across all areas of the UK fire and rescue service, regardless of role, contract type or location.
  6. Supervisory Leadership Development Programme: The Leadership Academy is piloting the SLDP to gain an indication from our staff as to the impact and suitability of the platform/content as a potential replacement for elements of the Gillian Tanner Leadership Programme.
  7. Senior Leadership Development Programme: The Senior Leadership Development Programme consists of a series of external speaker talks and workshops over the course of 2024 and 2025. These sessions will provide an opportunity for your development, by hearing about the lived experiences and unique perspectives of the speakers and reflecting on how this could be applied to your own place of work.
  8. Training for Trainers: 2-day training course designed for operational staff to cover topics such as worries and challenges about presenting, preparing objectives, trainer toolkits and training methods, learning preferences and barriers to learning, evaluation of training, and structures of lesson plans. The delegates are trained in presentation techniques and assessed through a presentation on a subject of their choosing.
  9. LFB values: Our values are a set of guiding principles that will help us to create a safe and professional workplace culture, and to achieve LFB's vision to be trusted to serve and protect London. The Commissioner and Directors have requested that each member of staff attends a mandatory 2.5-hour face to face workshop where you will be introduced to the new values and think about your role as an individual in bringing these to life. The workshop will provide in depth case studies that relate to all staff groups and provide a meaningful environment for discussion relating to our LFB Identity, vision, purpose, and future.
  10. Learning Support: Designed to support individuals with specific learning needs, based on individual needs and evidence of learning challenges. We also make workplace adjustments to a recruitment process and to the training/ work environment/ job role to support with a specific learning difficulty in undertaking development, duties, and responsibilities.
  11. Deaf Awareness Workshops: Designed to raise deaf (and hard of hearing) awareness in order to keep communities safer by allowing participants to:
    - a. Understand the range and scale of deafness.
    - b. Have exposure to lived experience of deafness to encourage compassion and empathy.
    - c. Improve knowledge regards the numbers of people who are deaf /are hard of hearing.
    - d. Recognise bias and judgement regarding deafness.
    - e. Enhance knowledge of the BSL app, BSL, support agencies and legal requirements.
    - f. Learn communication tips.
    - g. Experience lip reading through practical exercises.
    - h. Have a practical introduction to basic emergency BSL signs and intro to the BSL alphabet.

The reason for completing the DPIA are three-fold:

1. The project will involve the processing of personal data by third parties (third parties would include all cloud-based services)
2. The project will involve the collection of new information about individuals.
3. The project will disclose information about individuals to organisations or people who have not previously had routine access to the information (NFCC, GLA, Genius Within, Babcock, etc.)

## Step 2: Describe the processing.

**Describe the nature of the processing:** How will you collect, use, store and delete data? What is the source of the data? Will you be sharing data with anyone? You might find it useful to refer to a flow diagram or other way of describing data flows. What types of processing identified as likely high risk are involved?

The data will be collected in accordance with the Data Protection and Privacy Policy and the Data Protection Act 2018.

All personal data is collected in compliance with the DPA and maintained only in connection with the intended Project and shall not be transferred to any other (unverified) authority or any country or territory outside the EEA.

The data source is the HR/ People services feed as well as the StARS report, which is used to gather information about employees' name, their role, rank, title, occupational group, current location, and pay number. As majority of our courses are organised and run internally, the data that is used are the personal details that is collected and maintained by the LFB.

However, we have a few programs within the Leadership Academy where the data is shared with an external organisation:

1. Coaching and Mentoring – LFB Coaches and Mentors can sign up to be coaches or coachees on the GLA and WIG websites, which are external organisations. Their personal details (name, pay number, email, rank, title, station, and watch (location) are shared with the organisation to support with the exercise.
  - a. A few additional (optional) details are collected including occupational group, gender, ethnicity, religion, additional learning needs, and personal feedback and reflections are requested at the end of the session as an evaluation. Attendees have the choice to provide this if they feel comfortable.
2. Gillian Tanner and Frank Bailey – Similarly, details such as full name, pay number, job title and rank, station, and watch (location) are shared with Babcock, Radius, GBS, and Benchmark who handle the delivery for these courses (via Babcock). The data they collect is attendance to the course and what the course result is, this is all stored within the LMS Big learning.
3. Supervisory Leadership development programme and Middle Leadership programme – information such as their title, full name, and work email addresses is shared the with the National Fire Chief's Council (NFCC) who provide these leadership programs.
4. Learning Support – Details such as Name, DOB, contact number (personal and work), Email (personal and work), home address, pay number, Job Title, Station, Watch, first day of service and backgrounds of the assessment/ screening are shared with an external provider called GeniusWithin to organise the support – coaching or screening. Their personal information is also shared internally within the brigade to support their day-to-day role in the Brigade – Purchasing, IT, and Training, HR, Health management limited (Brigade's health provided), wellbeing team (for advice).
  - a. Workplace password: Details collected include Full name, pay number, Assessments (shared based on choosing), and Diagnosis (only shared with individual, line manager of their choice, training, and recruitment). Individuals are free to share their workplace passports across the Brigade depending on their own choosing.

**Describe the scope of the processing:**

What is the nature of the data, and does it include special category or criminal offence data? How much data will you be collecting and using? How often? How long will you keep it? How many individuals are affected? What geographical area does it cover?

All brigade data is in scope, and is collected daily via the Brigade's line of business systems (e.g. StARS). The Data Platform will be refreshed and updated nightly. Across our leadership programmes and workstreams, we collect both personal and special category data.

For most programmes, we collect data such as individuals' Full name, pay number, Job title, Station, and Watch in most cases, which mainly falls under the 'personal details' and 'work details' categories.

In some cases, we collect information such as Name, DOB, contact number (personal and work), Email (personal and work), home address, pay number, Job Title, Station, Watch, first day of service to provide the required support to the member of staff. This would include narrative data that we provide to external parties (e.g., information about behavioural characteristics and learning support recommendation)

In the coaching and mentoring workshops, we gather information such as religion, race, and ethnic origin in the evaluation form, to evaluate our performance in supporting individuals from underrepresented communities and with protected characteristics across the brigade. Additionally, the Learning support team also collect health information (e.g., physical, and psychological conditions), which falls under the special category data sources.

In accordance with the LFB commitment to data protection, we only keep personal data in identifiable form as long as necessary for the purposes for which it is collected, or where we have a legal obligation to do so. The people services feed that is provided to Babcock (our external training provider) is refreshed every 24 hours, therefore maintaining data integrity and authenticity. The data covers the individuals who belong to the London Fire Brigade but working with external as well as internal organisational teams.

**Describe the context of the processing:**

What is the nature of your relationship with the individuals? How much control will they have? Would they expect you to use their data in this way? Do they include children or other vulnerable groups?

Are there prior concerns over this type of processing or security flaws? Is it novel in any way?

What is the current state of technology in this area? Are there any current issues of public concern that you should factor in?

Are you signed up to any approved code of conduct or certification scheme (once any have been approved)?

We have no relationship with the individuals, all of whom are Brigade employees.

For our pilot programmes with smaller attendee numbers – such as the Supervisory leadership development programme, personal details are not retrieved, to maintain anonymity of the delegates who attend the workshop. Delegates who were part of the pilot were informed that their personal data was only shared with the NFCC to ensure that they are not misled about the purposes of any processing. However, when learning support collect data from individuals seeking assistance and support with learning difficulties, they have a one-to-one with a Learning Support Advisor (LSA) where they review personal details (physical and psychological health) and suggest the next steps – assessment or coaching.

All personal details are not newly gathered data, but existing data in the Brigade network. In instances where 'special category data' is requested, it is entirely optional for the delegate to share these details and a voluntary choice.

There are no concerns over the processing of this data. The LFB premises are maintained and access to buildings is restricted to ensure that all security doors are closed, and cabinets are locked. Doors and windows are always secured when the station/ building is left unattended. The visitors to the non-public areas of the Brigade are to be accompanied and signed in and out of the premises. Through this we ensure that data is collected, used, or handled in a way that is compliant with data protection law.

To minimise the risk of interception by the third parties (intentionally or otherwise), we consider the following precautions when sharing data with our third party suppliers (Babcock, Benchmark, GBS, Radius, GLA, WIG, GeniusWithin, etc.):

1. Is the data shared with the right recipients (YES)
2. Is the proposed use clearly defined and identified (YES)
3. Is the minimum amount of information being sent (YES)

We also ensure that we only process personal data fairly and ensure that data subjects are not misled about the purposes of any processing. We also ensure that data subjects receive full privacy information so that any processing of their personal data (with external agencies) is transparent.

**Describe the purposes of the processing:**

What do you want to achieve?

What is the intended effect on individuals?

What are the benefits of the processing – for you, and more broadly?

The purpose of processing data is to achieve the project objectives as outlined above, without any impact on the individuals involved.



## Step 3: Consultation process

**Consider how to consult with relevant stakeholders:** describe when and how you will seek individuals' views – or justify why it's not appropriate to do so.  
Who else do you need to involve within the Brigade? Do you need to ask your processors to assist?  
Do you plan to consult information security experts, or any other experts?

We do not seek individuals' views directly, as we are processing LFB data which is already being held. All other impact assessments have been completed and submitted to respective departments.

## Step 4: Assess necessity and proportionality.

### **Describe compliance and proportionality measures, in particular:**

What is your lawful basis for processing?

Does the processing actually achieve your purpose? Is there another way to achieve the same outcome?

How will you prevent the technology or system being beyond the purpose it was originally intended for?

How will you ensure data quality and data minimisation?

What information will you give individuals? How will you help to support their rights?

What measures do you take to ensure processors comply? How do you safeguard any international transfers?

Lawful basis for processing data is to support individuals with their leadership development through the leadership programmes, and provide necessary support and adjustments to LFB employees, in line with the Neurodiversity is a disability under the Equality Act (2010).

The processing of data will allow us to achieve our objective as:

1. They allow employees to access external training and leadership programmes such as the Supervisory Leadership Development Programme and Middle Leadership Programme
2. They allow employees to access expertise from external coaches and mentors from the GLA and WIG, as well as internally within the Brigade.
3. They allow employees to engage in and learn from the experts through leadership development programmes delivered internally and through external providers.
4. They allow employees to seek and receive support for their learning challenges and workplace concerns.
5. They allow employees to explore and engage with the LFB Values which were launched Brigade-wide on the 4<sup>th</sup> of December 2023.

We will ensure data minimisation by collecting, analysing, and sharing only the required data from each individual. This is typically information that is on the LFB system and sometimes includes additional information (from the special category).

All staff are informed that their data and records will be kept on your electronic personal record file (e-PRF) and retained in accordance with Policy number 788 - Electronic personal record files (e-PRF). Personal data shall be processed in accordance with Policy number 351 – Data protection and privacy policy.

We do not have any international transfer of data.



## Step 6: Sign off and record outcomes

Item	Name/date	Notes
Measures approved by:		Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:		If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:		DPO should advise on compliance, step 5 measures, specifically additional measures which could be applied to reduce or eliminate risks and whether processing can proceed
Summary of DPO advice:		
DPO advice accepted or overruled by:		If overruled, you must explain your reasons
Comments:		
Consultation responses reviewed by:		If your decision departs from individuals' views, you must explain your reasons
Comments:		
This DPIA will kept under review by:		The DPO should also review ongoing compliance with DPIA