



LONDON FIRE BRIGADE

Report title

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## Development of the Community Risk Management Plan 2022

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Report to	Date
Brigade Portfolio Board	26 July 2021
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Report by	Report number
Assistant Director Strategy and Risk	LFC-0558

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I agree the recommended decision below.

**Andy Roe**  
London Fire Commissioner

This decision was remotely  
signed on 28/09/2021

Date

### Executive Summary

The London Fire Commissioner's next Community Risk Management Plan will set out the Brigade's strategy for the next five years.

This report seeks funding for the development of a Target Operating Model (TOM) which will describe what the organisation will look like and the services it provides, together with implementation plans.

The LFB produced a high-level TOM in April 2021 as part of its work to produce its Community Risk Management Plan. The full TOM will develop the high-level TOM by describing the changes the organisation will take each year over the next five years to achieve the Brigade's purpose and vision.

Recommended decisions

For the London Fire Commissioner

That the London Fire Commissioner commit revenue expenditure from the London Safety Plan Reserve of up to ████████ over this financial year and next, for the development of a target operating model and related implementation plans to support development of the Community Risk Management Plan 2022.

## **Introduction and Background**

1. The transformation delivered through the Brigade's Transformation Delivery Plan (TDP) created the platform for the longer term change required to achieve our purpose and vision. It also created the direction of travel for addressing criticisms from Phase One of the Grenfell Tower Inquiry and Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services of our strategic planning, project and portfolio management, prioritisation and budget alignment. The development of the Community Risk Management Plan (CRMP) is being undertaken in this context and the approach officers are taking this time is intended to address these fundamental concerns.
2. As a result, the CRMP will be the Brigade's strategy for how we intend to achieve our purpose and our vision over the next five years and will describe the strategic changes we will make over that time to meet the needs, wants and expectations of the communities we serve. It will also describe how we will mitigate risk in London, as expressed in our Assessment of Risk.
3. There are many ways in which we could achieve our vision and deliver the strategic changes that support it. We now need to work with the communities we serve and our staff to agree the best way to achieve that vision and produce a coherent, phased programme for change which is specifically designed to deliver the strategic changes that will meet the needs, wants and expectations of the public.
4. It is recommended that the process we use to do this is to develop what is called a full Target Operating Model (TOM).
5. The TOM would comprise a detailed organisation design, or end state, and implementation plans for each of the five years in the strategy. It would describe the organisation at the end of each year, the services it provides, the ways in which it provides them and how the organisation functions internally and works with communities and partners to deliver those services. The implementation plans would describe the specific changes that the organisation will make within that year to achieve the design in year five.
6. The TOM would flesh out the detail of each of the strategic changes and describe the contribution needed to achieve that change from each of the following areas:
  - Technology and assets
  - Data and reporting
  - People and organisation
  - Governance and decisions
  - Internal business methods and processes
  - Culture and leadership
  - Partners and networks
7. This design of the TOM would be scalable so that it can flex depending on the level of funding available to the organisation, allowing the implementation plans to be adapted accordingly. This

would mean that the TOM would inform where efficiencies could be made while still enabling the organisation to achieve the vision.

### **New approach**

8. The first step towards the development of the TOM has been the production of a high-level TOM, developed in Q1 of 2021/22. This has enabled the organisation to describe its direction more fully, start developing our service-led strategy and identify the strategic changes the organisation needs to make.
9. This new approach will be a marked change from previous London Safety Plans (LSP), which identified potential areas for improvement within each department or functional area without an overarching vision or end state to work towards. Whilst the goal was to improve services, the absence of a stated vision and purpose made it difficult to assess which improvements were the most important and to produce a coherent plan for change.
10. This constrained the scope of our change activities to tactical, incremental improvement and meant that different areas of the service changed at different speeds and not necessarily in the same direction.
11. In previous LSP consultation exercises, we consulted on a final draft of the London Safety Plan. This time we are consulting much earlier in the process and will follow that up with further internal and external engagement to inform the content of the CRMP.
12. Having set out our vision for the future, we are engaging much earlier in the process because it will be crucial that we involve the communities we serve in designing our transformation so that we can meet their needs, wants and expectations. It will be equally important that the TOM is developed with input from colleagues across all parts and all levels of the organisation. The intention is to create a shared vision of what the organisation will become that we can all own and commit to delivering.

### **Progress to date in delivery of CRMP**

13. The high-level target operating model has delivered the strategic intent and service-led strategy for the organisation for the next five years and has gained broad consensus on the long-term strategic direction for the organisation. Additionally, it has started to allow us to communicate our potential future, our aspirations and what we want to mean to Londoners.
14. The work was completed at pace, in just six weeks, with the support of consultants, who adapted their established methodologies to suit our context and meet our needs. Taking their steer from interviews with the Commissioner, Directors and the Assistant Commissioners with responsibility for front-line service delivery, they helped us survey over 800 Londoners, ran three focused workshops with community groups, held seven intensive design workshops with senior leaders and involved over 80 members of staff in the development process.
15. The results of the survey and workshops were particularly valuable and have informed the development of the strategy. Londoners told us that whilst they have a high degree of trust in the Brigade, this appears to be largely based on the reliability of our response service and they have a poor understanding of the broader services we offer. They want us to be more visible; many people are unaware of the location of their nearest fire station and of those that do, many consider them to be unwelcoming and inaccessible. People want services to be provided locally

and only around half of those surveyed think we understand the diverse needs of London's communities.

16. In the light of their views, we have developed our service-led strategy and our four new strategic pillars which focus on the areas that are key to achieving our vision, replacing the existing strategic pillars in the TDP. Within each of these we have identified two areas where a strategic change is needed. We are referring to the purpose, vision, pillars and strategic changes collectively as *Our Direction* and this is set out in Appendix One.
17. We will be asking the public and our staff for their views on how important it is that these areas should inform our strategy as part of the formal consultation we are conducting in September. This consultation will also seek views on our draft Assessment of Risk. The outputs of this consultation will inform the further development of the CRMP.

### **Next steps for CRMP development**

18. For the Brigade to move to its next stage of transformation it requires a clear plan that sets out what changes the organisation must make to create a service-led organisation and a shared understanding of where we are headed that everyone will be able to describe and buy-in to. This will need to be informed by our understanding of risk, the communities' views of risk and the services we need to provide to reduce that risk. This will demonstrate our intention to put communities at the centre of what we do and enable them to hold us to account.
19. To do this effectively we will need to develop a full TOM as explained at paragraph 5. Without it, we will not be able to describe the future state of the organisation and what it means to our staff and the public. It will also be difficult to identify the actions we need to take to deliver the changes we are seeking and reduce risk to the public.
20. For example, one of the strategic changes identified in the high-level TOM is about providing the right channels for people to access our services, taking their needs and circumstances into account. This could involve digitising our services and building on the approach we have taken recently with on-line home fire safety visits, it could mean increasing the in-person provision of services from fire stations and/or in people's homes or places of work. There are significant implications for each of these approaches in terms of cost, staff, training, facilities and equipment, so it will be important to identify and agree the way forward.
21. The process of defining the organisation we are seeking to become will enable us to understand the preferences of different communities, the views of our staff, the benefits and costs of each possible option and enable us to agree our preferred service model.
22. These preferences will inform the creation of the detailed implementation plans that describe who will provide those services, how they will be funded, recruited, trained and supported. It will identify the infrastructure changes required to enable it; the changes to processes and systems. The TOM will give us a description of what we are aiming to achieve and from there, we will be able to identify the actions that are needed each year to get us to our goal. Without it, it will not be possible to create a cohesive plan for change.
23. In summary, this will deliver:
  - The identification of opportunities to improve value for money, especially in public facing services

- A clearly stepped journey to becoming the organisation Londoners want us to be
- Clarity about what changes we can invest in to deliver the vision and what we can stop
- A clear articulation of the value of each of our services and the most efficient and effective way to deliver them
- An annual implementation plan with clear actions that will be achieved in each year
- A shared understanding with our workforce and Londoners of the changes we will deliver
- A framework for future strategic decisions
- A strategy that puts LFB at the centre of the communities it serves, delivering the services they need, want and expect
- A strategy that builds on the success of the TDP and earns the trust of London's diverse communities

#### *Timeline*

24. Tenderers will be required to demonstrate how their work will inform the CRMP that will be published in April 2022. The CRMP will be written towards the end of November/December to ensure sufficient time for the governance processes of scrutiny and approval. As the work to produce the whole TOM and the implementation plans for each of the five years is expected to take between four and five months, tenderers will need to produce a schedule of work that produces the necessary input for the CRMP itself and the implementation plan for the first year of the plan to meet this timetable.

#### **Value for money and return on investment**

##### *Value for Money*

25. Whether this is done in-house or with the support of consultants producing the TOM would require significant investment, as the costs are anticipated to be between £400,000 and £530,000. Officers consider this level of investment to be good value for money for the reasons set out below.
26. The TOM will enable LFB's decision makers to identify projects that offer greatest value for money because it will provide an end state to measure them against. It will provide a greater understanding of the relationships and dependencies between activities to enable the organisation to invest in right change at the right time and in the right order to achieve LFB's vision as efficiently and effectively as possible. The TOM will enable us to better support the front-line and enable us to focus our services on those that meet the needs, wants and expectations of the public.
27. The TOM will make it possible to align LFB's budget to our vision and, in doing so, it will identify areas where efficiencies could be made. It will mean that budget proposals can be assessed against the extent to which they move the Brigade towards delivery of the vision.
28. Through a process of cost/benefit analysis, the design and implementation plans included in the new TOM will identify what will change, how it will change, what the benefits will be and how it will feel different to what we do now. This clear articulation of our portfolio of change will allow the Mayor to hold us to account at every stage of our transformation.
29. To achieve value for money from the contract, the tender process will take a similar approach to that for the high-level TOM.

30. Collaborative procurement through the GLA has been explored by the Brigade's Procurement department and is not an option in this instance. Instead, this requirement will be sourced through the Crown Commercial Service (CCS) Management Consultancy framework (MCF) – Lot 4 which includes an extensive list of suppliers that can support our service requirement ensuring competition from a range of large and small suppliers.
31. This is the framework through which we secured the consultants for the high-level TOM. We generated a significant amount of early interest by holding a breakfast briefing for bidders prior to the launch of the tender. This provided a platform for us to ensure our requirements were properly understood by the bidders and to encourage submissions from appropriate suppliers. This enabled tenderers to produce bids that were more tailored to our specific needs and meant that the successful tenderers were able to start on site within a week of their appointment.

#### *Return on Investment*

32. There will be financial benefits arising from the production of the TOM, as it will result in the organisation having a clear path to achieving its vision, with a clearly identified implementation plan. This will allow the Board to optimise investment decisions and align expenditure with our strategic intent.
33. The TOM will also identify how we will produce a balanced budget, so will identify opportunities for savings in the longer term. Published comparators are rare, but officers understand that a similar sized police force undergoing a large-scale transformation is anticipated to produce a return on investment of 15.4%. It is too early to be certain of the efficiencies that could be generated from this investment, however, as part of developing the value case for the transformation, parameters can be set for our anticipated return on investment.
34. The triage criteria that have been applied to this proposal are set out from paragraph 772, which includes an assessment of the return on investment.

#### **Options Considered**

35. An options analysis has been undertaken and market research to estimate the potential costs. The options are set out below.

#### **Option 1. Produce the CRMP without a TOM**

36. This option would entail using the high-level TOM and the outputs of the consultation on our direction to produce the CRMP. We would produce an action plan as part of the CRMP, similar to those produced for previous LSPs.

#### *Benefits*

37. We would meet the requirements of the National Framework for Fire and Rescue Services in England to have an integrated risk management plan (our CRMP).
38. Improvement actions would be identified over the life of the strategy that could contribute to delivery of the vision.
39. The CRMP could be delivered within existing budgets.

#### *Concerns*

40. There would be no clearly defined end state and no pathway to its delivery. Improvements would need to be identified at a departmental level that could demonstrate a contribution to achievement of the vision.
41. Without a clearly defined end state, it would not be possible to identify the clear priorities and the order in which those actions must be delivered to enable the Brigade to move to its desired state. This would also mean that stakeholders would not have a full implementation plan to hold the LFC to account and give stakeholders confidence that the transformation is both sustainable and achievable within the identified budget and timescales.
42. It would mean that LFB would be unlikely to transform into the organisation which satisfies its stated purpose and vision. This would limit the scope of change to incremental and tactical improvements to the service and the Brigade would continue to change in an uncoordinated and incidental way.
43. Should financial efficiencies be required during the life of the CRMP, without a TOM, a strategy for delivering reductions in funding would need to be developed separately.

## **Option 2. Develop a team to produce the TOM in-house**

44. This would entail producing the design and the implementation plans in-house without the support of consultants. This would require additional capacity and skills. Based on the work we have done to create the high-level TOM, we estimate that it would require an additional team of five people: a senior operating model strategist, senior operating model lead (2 x full unit cost of ██████████) and three operating model analysts (3 x full unit cost of ██████████). The full year cost of this team is estimated at ██████████.
45. Our experience of working with consultants on the high-level TOM has informed our expectations of the roles that we would require to undertake a full TOM in-house. We would expect that the requirements for strategic insight and expertise in developing target operating models would be greater than that for the high-level TOM, so we have allowed for both senior roles to be full time. In addition, we anticipate a need for more in-depth analysis, hence the creation of three analyst roles. These skills are found largely in the private sector and we would be seeking candidates with private sector skills and experience of their application in both the private and public sectors. Our research into the salaries commanded by such strong candidates in this field has informed the costings for these roles.
46. This team could either be created as a task and finish group, in which case, we anticipate needing the team for a full year; allowing three months to produce a full project plan, six months for delivery and three months to finalise the TOM during the approval process. Alternatively, the team could be established on a permanent basis to offer internal consultancy services across the GLA functional bodies. We have not assessed the internal demand for those services, and further work would be necessary to determine the extent to which this would provide value for money.

### *Benefits*

47. A clearly defined end state would be produced in the light of the results of the consultation, and further engagement with communities and staff. This, together with the supporting implementation plans would inform the development of the CRMP.

### *Concerns*

48. Bringing the team on board would take time. Recruiting the right team with the requisite levels of knowledge and experience is likely to take around six months from the point of budget approval. We cannot be certain of the availability and market rate of staff with the required levels of experience, but we would hope to have the team in place by the beginning of March 2022 (assuming approval before the end of August) with most employed consultants of the right seniority requiring six months' notice. Additionally, there would be a period of bedding in, understanding the previous work of the high-level TOM and project mobilisation before work on the design and implementation plans could commence.
49. This recruitment would require significant input from the small team that is delivering the CRMP and would redirect resources that would otherwise be focused on supporting the level of internal and external engagement required to inform the CRMP.
50. The alternative would be to employ contractors through an agency, though this also comes with additional costs of agency fees and a risk of not being able to obtain the right level of knowledge and experience to deliver such a complex project, retention of agency staff would also be a risk in a growing market. The recruitment process itself would still require significant input.
51. In terms of capability, this would be our first attempt at producing a TOM and we anticipate it would take more time as a result, meaning that the Brigade would continue to hold greater levels of risk. The lack of internal experience could also mean that we require several iterations to produce coherent plans. This could in turn, place higher demands than should be necessary from already busy departments. We have assessed that we could have a first draft design by late summer 2022 and implementation plans by the end of that year.
52. It would not be possible to replicate the access to the range of capabilities that would be offered by working with a consultancy. It is possible that we would still need to buy in external expertise in specific areas of the design (for example in relation to digital services, technology and innovation), to meet this target date.
53. Without the TOM available to inform the CRMP this year, the CRMP would focus on the outputs of the high-level TOM, with no supporting detail about how the strategic changes would be delivered. The implementation plan for the first year of the strategy would set out the steps for designing the future organisation and producing the plans to achieve it. It would also be possible to identify tactical improvement actions at a department level that could take place in the absence of an overall plan for transformation.
54. As a result, once the TOM were complete, it is likely that we would want to issue a revised CRMP to commence from 2023. An alternative approach would be to extend the existing London Safety Plan 2017 for a further year and release our first CRMP from April 2023.
55. This would provide more time to develop our strategy with the public but would mean that significant transformation will begin from 2023.

### **Option 3. Produce the TOM with support of consultants**

56. This option would require us to tender for the support of consultants to produce the TOM as a one-off piece of work.
57. A clearly defined end state would be produced in the light of the results of the consultation, further engagement with communities and staff. This, together with the implementation plans would inform the development of the CRMP.



### *Benefits*

58. The advantage of the use of consultants would be to access a breadth and depth of experience that can only be provided by a large consultancy used to delivering this work at pace. This would include a variety of subject matter experts as and when required to supplement the core delivery team at specific stages of the project.
59. The tender would also include a requirement to transfer sufficient knowledge and skills to the Brigade to enable us to adapt and revise the design and the plans over the period of delivery, as needed.
60. The tender would be issued as soon as possible after budget approval is secured. The appointment of the consultants for the high-level TOM, from issue of the tender to start on site, took six weeks. Officers would hope that the work would commence as soon as possible to maximise the information available for the CRMP's development. It is expected that the work would take between four and five months, so is likely to continue to at least the end of the financial year in 2022.
61. Careful phasing of the work will be required to provide us with sufficient certainty around the design to be able to produce the CRMP to the existing timetable. Priority will be given to developing a prioritised design and implementation plan which covers the first year of the CRMP which will allow us to deliver the CRMP on time with a clear plan for high priority changes and quick wins for the first year with further work undertaken in the New Year to complete the detail for years two, three and four.
62. This option reduces the impact on departments and the risks of abortive work that could result from option 2, as the consultants will be expected to enable us to get it right first time and to bear the brunt of the work.

### *Concerns*

63. The tender process will need to be rigorous and also completed quickly so that the consultants could be brought on board in time to meet deadlines. Officers intend to follow the proven approach taken in tendering for the high-level TOM work to reduce this risk.
64. It would be crucial to select consultants who are a good fit with the organisation and can work from the existing starting point of the high-level TOM. This would be included as a requirement within the tender specification.
65. Delivering the work at pace could have an impact on departments' other work and the tender will require bidders to describe the steps they will take to minimise that impact.
66. The options with associated benefits and issues are summarised in the table below.

Option	Description	Benefits	Issues
1	Develop the CRMP without the TOM	An action plan is produced for each year of the CRMP  Costs can be contained within existing budgets	There is no clear pathway to the end state  Resulting delivery is less likely to deliver the vision and progress will be difficult to demonstrate

Option	Description	Benefits	Issues
			<p>Priorities are harder to determine</p> <p>Investment decisions will be made without an overall goal, making it harder to demonstrate value for money</p> <p>Reduced requirement for input from departments, staff and communities</p> <p>Change is not transformative but instead incremental and tactical risking that the organisation never meets all the needs, wants and expectations of Londoners</p> <p>There would be no strategy to address any future funding reductions</p>
2	Develop the TOM in-house	<p>Future end state designed and implementation plans developed</p> <p>Plans would inform how to achieve future efficiencies</p>	<p>Additional resources needed, anticipated full year costs  <span style="background-color: black; color: black;">██████████</span></p> <p>Lead in time to recruit could impact on delivery timescales</p> <p>Availability and market rates of suitable resources untested</p> <p>Future end state and implementation plans not available until after CRMP approved</p> <p>End products may need revision as in-house expertise and understanding develops, placing further demands on departments</p> <p>May require additional input from specialist consultants</p> <p>Potential for loss of momentum for change</p>

Option	Description	Benefits	Issues
			Revised CRMP needed for 2023 onwards or existing LSP extended for further year.
3	Develop the TOM with consultancy support	<p>Future end state designed, with supporting value case and implementation plans</p> <p>Access to specialist expertise provided within costs</p> <p>Future efficiency requirements would be addressed through a scalable target operating model with full value cases</p> <p>Work delivered to meet existing CRMP timetable</p> <p>Focussed input required from departments, reducing overall demand</p> <p>Quality of end product assured</p> <p>Maintains momentum</p>	<p>Additional resources needed, anticipated costs d [REDACTED]</p> <p>Consultants will need to work from the existing high-level TOM</p> <p>The impact on the organisation of doing the work at pace will need to be minimised.</p>

### Recommended Option

67. The third option is recommended.

68. Our journey so far in delivering the TDP and our learning from the development of our high-level TOM has enabled us to begin to understand the scale of the transformation required for us to fulfil our purpose, deliver our vision and become the organisation Londoners want us to be.

69. Officers had hoped that it would be possible to develop the full TOM in-house without the need for additional resources, but it became apparent through working with the consultants on the high-level TOM that the organisation has not yet developed the capability and capacity required to take the work to the final stage. Completion of the high-level TOM demonstrated the benefits that could be achieved from producing a full TOM, which is now the recommended next step.

70. To enable LFB to sustain this scale of change and momentum we recommend additional one-off investment of circa [REDACTED] to procure strategic consultancy services to fund the next stage of the TOM development. Officers recognise the challenges that such a level of investment and consultancy spend may raise, however, it is considered to offer better value than creating the recurring cost that would arise from establishing a permanent team, given that this is a task and finish piece of work.

71. This will allow us to accelerate our transformation by designing the future organisation we are seeking to become and the implementation plans to deliver it and ensure that the Brigade becomes the sector leader in the UK fire and rescue service and is held to account by its key stakeholders.
72. This sum is based on the results of market testing and on the level of investment in consultancy support ( ) that was required for the high-level Target Operating Model. We have spoken to a number of consultancies to understand the work involved and the likely timescales. We have taken a cautious approach to the estimate, providing some risk tolerance and we understand that work will provide the information necessary to develop the CRMP and its supporting plans. Specifically, we expect to produce:
- a TOM: a detailed description of the organisation and the services it provides for each year of our five-year strategy
  - implementation plans: that set out the actions we will take to reach each annual phase of the change
  - a value case for change: setting out the deliverable benefits and improvements to productivity that will result in better value for Londoners
  - enable knowledge transfer: the development of the current strategy and planning team to upskill them in long term strategy development and transformation processes
73. The funding can be provided from unspent monies within the London Safety Plan reserve, which was established to support the implementation of the previous London Safety Plan. The reserve has a remaining balance of £2.7m and it is proposed that this reserve is transferred into a new CRMP reserve to support the preparation and implementation of the new plan. Officers acknowledge that this level of investment in the plan itself is significant and consider it to be worthwhile as it will enable the Brigade to better prioritise and align its budget to those activities which will achieve the vision and deliver services that meet the needs, wants and expectations of the public.
74. We have sought to benchmark our proposals for investment in transformation and whilst we have been unable to find much comparative information on costs, it is clear that many public sector organisations have taken this approach to transformation. Some, including the Metropolitan Police, National Crime Agency and West Midlands Police forces, have even entered long-term partnerships with consultants to support them through both the development and the delivery of their TOM and Scottish Fire used consultants to assure them on their transformation and portfolio of work.
75. The capability building in portfolio, programme and project management; business change; continuous improvement and business assurance that is already being developed by the Transformation Directorate will enable us to deliver the CRMP in a controlled and sustainable way. However, these are different and very specialist skills to those that are needed to develop the end state design and detailed implementation plans, which is why we are seeking consultancy support for the work.
76. We will require an outline project plan as part of the tender submission and full project plan to be delivered during the start-up phase of the work once the tender is awarded. We know that these

timescales are tight however we have delivered under such time pressures before with the high-level TOM being delivered in six weeks, within budget and to the required standard. We are therefore confident that we can do this again with the next stage of the development of our long-term strategy.

### **Triage Criteria for Investment Bids**

77. The bid has been assessed using the triage criteria for investment bids developed by Portfolio Board (24 March 2021).
78. Applying the criteria to the production of a strategy or plan is challenging, as they are largely designed to help the Board identify which projects are most likely to help the organisation achieve its goals. This investment bid is for funding to identify those goals rather than deliver an aspect of them. Nevertheless, the criteria have been used as far as possible to provide a measurable assessment of value.

#### *Organisational Risk Reduction Quantified*

79. There are two corporate, red-rated risks that would be mitigated as a result of this work.
- a. CS1 - Cuts in government funding, in part as a result of inability to demonstrate effective utilisation of staff and additional externally driven costs (e.g. Covid, Brexit, legal challenges) result in a financial shortfall reducing the overall size and capacity of the Brigade to effectively deliver BAU and LFB's change/transformation agenda. The current risk score is 20 (likelihood 4, impact 5). The target score is 4, 4.

Specifically, there are two controls that will be delivered or supported by this work, they are:

- i. Robust internal budget planning cycle and effective financial management (a current control which is rated as high amber).
  - ii. Delivery of CRMP and the TOM providing clarity on business planning and resource requirements (a further control which is also rated as high amber)
- b. TF1 - Completion of the TDP and development of the core transformation capabilities (portfolio, risk and assurance, continuous improvement, CRMP) fail to deliver the change the Brigade needs to make to thrive as a modern fire and rescue service leading to LFB not fulfilling our mission. The current score is 20 (likelihood 4, impact 5). The target score is 2, 4.

Specifically, there are two controls that will be delivered or supported by this work, they are:

- i. Developing the 2022 CRMP and TOM, including the setting of strategic aims (a current control which is rated as green)
- ii. Delivery of 2022 CRMP and TOM (a further control which is rated as high amber)

80. Of the eight significant directorate risks on the latest version of the corporate risk register, there are three that will be mitigated by the outcomes of this investment. They are:
- SR6: Budget does not provide sufficient funding to meet aspirations of CRMP. The current risk score is 12 (likelihood 3, impact 4). Target score is 2, 2.
  - SR7: Mayoral priorities do not match CRMP priorities. The current risk score is (likelihood 2, impact 4). Target score is 2, 3.
  - SR8: The outcome of the TOM leads to an unpalatable resource requirement. The current risk score is (likelihood 3, impact 4). Target score is 3, 3.

81. The successful completion of the end state design and implementation plans is anticipated to bring these risk scores down to their target levels and it should be possible to reduce the score of SR8 even below the target score.
82. There are other risks that should be mitigated by the delivery of the TOM itself, in fact most, if not all of the risks should be addressed by actions to deliver the TOM, as its purpose is to set out the path to successful delivery of our goals and so has to be informed by risks to achieving those goals. However, the evidence of this will not be available until the TOM is created, so this has not been used to inform the overall score for risk reduction.

#### *Business as usual cost and impact*

83. This score is also difficult to calculate, as the TOM will affect all business areas, but the impact and costs of that cannot be quantified until the TOM is delivered. However, a requirement of the work is that the TOM is scalable and that it results in a value case for all investment of change, so the full impact and costs will be confirmed by the work. As the work will be shaped and agreed by the leadership team, a score of 5 is suggested.

#### *Delivery plan*

84. Our experience of working with Accenture on the high-level TOM provides us with strong assurance that before the work commences, we will have a project plan that details the high-level tasks, milestones, stage gates for delivery and a deployment plan. As a result, a score of 5 has been suggested.

#### *Return on Investment*

85. There will be financial benefits arising from the production of the TOM, as it will result in the organisation having a clear path to achieving its vision, with a clearly identified implementation plan. This will allow the Board to optimise investment decisions and align expenditure with our strategic intent.
86. The TOM will also identify how we will produce a balanced budget, so will identify opportunities for savings in the longer term. Published comparators are rare, but officers understand that a similar sized police force undergoing a large-scale transformation is anticipated to produce a return on investment of 15.4%. It is too early to be certain of the efficiencies that could be generated from this investment, however, as part of developing the value case for the transformation, parameters can be set for our anticipated return on investment.
87. The criteria for calculating the triage score suggest that where the cost of the change has been partially quantified, a score of 2 should be awarded. A score of 3 should be given where there is a fully costed proposal with the time to benefit realisation identified, future BAU operating cost identified, and ROI calculated, with an identified budget line item and amount of reduction.
88. As the cost of the change has been quantified and the work will produce a value case for the TOM, which will cost the future operating model, a score of 3 has been suggested.

#### *Triage scores*

89. The table below summarises the scores for each criterion and the overall score. The expectation for an investment bid of over £150,000 is that it achieves a score of 4 or 5 (the maximum score possible).

Criteria	Paragraphs used	Score	Weighting	Weighted Score
Organisational risk reduction quantified	79 - 82	5	0.3	1.5
BAU cost and impact	59, 62, 65, 83	5	0.2	1.0
Delivery plan	24, 60, 61, 76, 84	5	0.2	1.0
Benefits understood	5-7, 19 - 23, 58-62	4	0.2	0.8
ROI	25 - 34, 85 - 88	3	0.1	0.3
Total Score				4.6

### Equality Impact

90. The London Fire Commissioner and decision takers are required to have due regard to the Public Sector Equality Duty (s149 of the Equality Act 2010) when exercising our functions and taking decisions.
91. 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.
92. 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.
93. The Public Sector Equality Duty requires us, in the exercise of all LFC functions (i.e. everything the LFC does), 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; and
  - Foster good relations between people who share a relevant protected characteristic and persons who do not share it.
94. Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard to the need to:
- 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; and
  - 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.
95. 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.

96. Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard to the need to:
  - a. tackle prejudice; and
  - b. promote understanding
97. The recommendations set out in this paper aim to ensure we meet our legal duty set out in the Equality Act 2010 and Public Sector Equality Duty through a number of means.
98. Firstly, through engaging with the public in the development of the TOM and the Community Risk Management plan, we expect to gain a stronger understanding of the needs, wants and expectations of the people we serve and in particular, will seek to give voice to under-represented and seldom heard communities in our engagement.
99. Secondly, by engaging directly with our staff and also the staff networks and trades unions to ensure their perspectives are included in the TOM.
100. Thirdly, both the CRMP and TOM will be developed within the framework of the Togetherness Strategy with the intention of eliminating discrimination, unfairness and inequality in the services we offer and within the Brigade itself.
101. The Equalities Impact analysis that is being used to support and inform the development of the CRMP is appended to this paper for information.

### **Procurement and Sustainability**

102. Collaborative procurement through the GLA has been explored by the Brigade's Procurement department and is not an option in this instance. However, this requirement will be sourced through the Crown Commercial Service (CCS) Management Consultancy framework (MCF) – Lot 4 which includes an extensive list of suppliers that can support our service requirement ensuring competition from a range of large and small suppliers.
103. Consideration of other Responsible Procurement requirements will also be undertaken as standard process as part of the tender, this includes ensuring suppliers are compliant with the Modern Slavery Act with a published statement.
104. The Procurement team are already involved with the development of this tender and the Sustainability team are considering the requirements for the sustainability impact assessment for the CRMP.

### **Finance comments**

105. This report recommends that revenue expenditure is approved of [REDACTED] to support development of the CRMP 2022. This expenditure is expected to be in the 2021/22 financial year but some may be incurred in early 2022/23.
106. The cost will be funded from the London Safety Plan reserve, which was established to support the implementation of the previous Integrated Risk Management Plan. The reserve has a remaining balance of £2.7m and it is proposed that this reserve is transferred into a new CRMP reserve to support the preparation and implementation of the new plan.



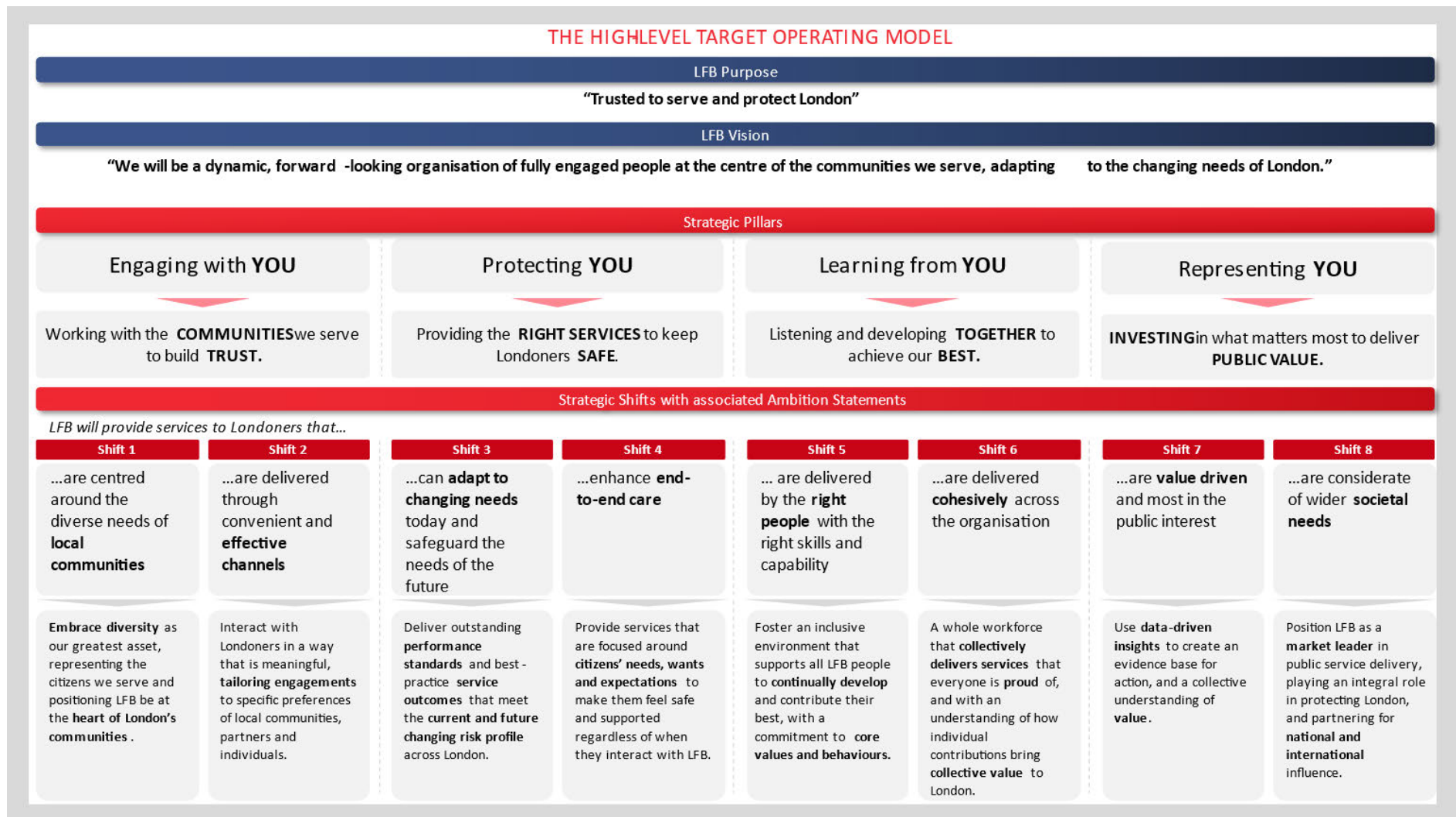
## Legal comments

107. 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.
108. 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 Fire and Resilience (the "Deputy Mayor").
109. 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...".
110. The Deputy Mayor's approval is accordingly required for the London Fire Commissioner to commit the revenue expenditure requested in this report.
111. The production of the CRMP is a requirement of the National Framework issued by the Secretary of State under section 21 of the Fire and Rescue Services Act 2004. Section 21(7) of the Act requires the Commissioner to have regard to the Framework in carrying out their functions.
112. The value of the proposed procurement will require that any procurement activity is undertaken in compliance with the London Fire Commissioner's Standing Orders Relating to Procurement and the Public Contracts Regulations 2015. The proposed procurement routes set out in this report would be compliant with these requirements.

## List of Appendices

Appendix	Title	Protective Marking
1.	CRMP Our Direction	None
2.	CRMP Equality Impact Assessment	None

# Community Risk Management Plan: Our Direction



## Equality Impact Assessment (EIA) Form

The **purpose** of an EIA is to give **as much information as possible** about potential equality impacts, to demonstrate we meet our **legal duties** under the Equality Act 2010.

Please read the EIA Guidance [on Hotwire](#) before completing this form.

### 1. What is the name of the policy, project, decision or activity?

Community Risk Management Plan (CRMP).

Overall Equality Impact of this policy, project, decision or activity (*see instructions at end of EIA to complete*):



### 2. Contact details

Name of EIA author	Mark England and Tiffany Oarton
Department and Team	Strategy and Risk & Equalities
Date of EIA	

### 3. Aim and Purpose

What is the aim and purpose of the policy, project, decision or activity?	<p>The aim of the project is to develop a new Community Risk Management Plan (CRMP) formerly known as London Safety Plan and in many other fire rescue services an integrated risk management plan (IRMP).</p> <p>We are required by the Fire and Rescue National Framework for England to produce an integrated risk management plan (IRMP). We will be referring to our integrated risk management plan as a <i>community risk management plan (CRMP)</i>, in accordance with the National Fire Chiefs Council, which has adopted the term as a generic name for the risk plans required by fire and rescue services across the UK.</p> <p>This EIA is aimed at assessing the potential impacts, positive, neutral and adverse to ensure the LFB has due regard for equality.</p>
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	<p>Our CRMP will:</p> <p>Be framed by our purpose (trusted to serve and protect London), as defined in the Transformation Delivery Plan (TDP) and to align with the Togetherness strategy;</p> <p>Set out our strategy for delivering the Target Operating Model (TOM) that will achieve the vision described in the TDP by 2026;</p> <p>Be service-led and co-created with communities and staff;</p> <p>Incorporate the intentions in the TDP into the changes required to achieve the vision (so the CRMP will replace both the TDP and the LSP 2017);</p> <p>Incorporate the improvements needed in response to the learning from the Grenfell Inquiry and HMI recommendations and any outcomes from the Cultural Change review;</p> <p>Set out the case for our budget requirements.</p>
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**4. Equality considerations:** the EIA must be based on evidence and information.

*Currently in initial consultation phase with engagement/ Inclusion team.  
Planned consultation/Engagement programme to be produced.*

This EIA is evidence based and aims to utilise data from both internal and external sources. It will also use information gathered from the engagement taking place with the communities of London, hoping to recognise any impacts that may come from this.

The first consideration is to ensure the analysis of the impact of any policy, provision or service, or change thereto, must be in compliance with s.149 of the Equality Act 2010, known as the Public Sector Equality Duty (PSED). The PSED sets out that a public authority in this instance the LFC, in the exercise of its functions, must also have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between persons who share a relevant protected characteristic and those who do not share it.

Therefore, this EIA will show considerations to the anticipated impact on people who share protected characteristics. It will also be cognisant of those people who fall out of the specified protected groups. The draft CRMP and any changes in working, proposals or alterations to delivery of service from the current LSP will be subject to review by this EIA to ensure equality is at the forefront of the decisions.

The draft will be subject to public consultation after which the equality analysis will be re-assessed for the final report to Commissioner’s Board in March 2022.

The following characteristics are protected characteristics:

- age
- disability (to include neurodiverse characteristics)
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

We must consider any impact on people who share relevant protected characteristics through the lifetime of the CRMP along with the continuing assessment of risks in London. There will, with this in mind, be several EIAs. These will sit under this overarching version that allow at relevant decision

points a reassessment of any equality impacts. For example, a single engagement EIA and then separate Borough engagement EIAs aimed at recognising any impacts, positive and negative in the specific communities that they serve. This may in some cases require evidence gathering, engagement or consultation with those affected by the proposed policy or change, if any. There will also be evaluation of the evidence. The ultimate purpose of any analysis is to provide those making the decision with the information to make an informed decision, so that where possible potential differential impact is eliminated, and where it is not possible, it is mitigated against.

London as a city must therefore be assessed to understand the communities the CRMP will serve both at a borough and pan London level.

With a population of 8.98million this equates to 15 percent of the total population of England.

A census was undertaken in March 2021 and during the lifetime of this EIA it is envisaged that the new data will be revised to show any differences.

At the 2011 Census, the most ethnically diverse region in England and Wales was London, where 40.2% of residents identified with either the Asian, Black, Mixed or Other ethnic group. For this analysis the GLA datastore has been utilised to inform on demographics. This is the most up-to-date census as the 2021 census has been postponed owing to Covid.

The LFB utilises the LFB's Assessment of Local Risks (AoLR) which is a public facing document, designed to help increase the understanding of how risk (from fire and other emergencies) in London has changed over time and how different elements combine together to give a picture of risk. The AoLR is not the only process the LFB uses to determine and provide its services, but it does give a high level overview which can be used to understand the basic concepts of fire cover and the steps the LFB are taking to make people safe. The Assessment of Local Risks is updated annually as new data becomes available.

The Brigade sets out how its prevention, protection and response activities will best be used to mitigate the impact of risk on communities in the CRMP.

How the LFB targets fire safety work;

The LFB targets its fire safety work on lifestyles of individuals rather than groups of people who share protected characteristics.

This is because information about incidents collected indicates that the behaviour and lifestyles of individuals remains one of the primary factors in the number of fires that LFB attends. Whilst it is true that certain lifestyles identified as being at higher risk will also contain people who share protected characteristics, belonging to a protected



LONDON FIRE BRIGADE

characteristic group in the first place does not place individuals at risk.



### What do we know about the CRMP proposals?

Plan includes future proposals and subsequent impacts, I imagine this area to be comprehensive, showing due regard for the nature of change and the potential impacts to London, London's communities and LFB staff in totality, along with what and how we plan to mitigate the impact or impacts.

### What we know about our staff

The LFB holds data on staff with regard to sex, race, disability, age, sexual orientation and religion. Specific data is not collected on the remaining protected characteristics of gender reassignment, marital/civil partnership status and pregnancy/maternity however data can be utilised to gather an understanding of how maternity leave, maternity support leave and shared parental leave is used. The data held is supplied both at recruitment and on employment, and staff are periodically reminded to review and update the information held on them according to the requirements of the Data Protection Act.

5. Assessing Equality Impacts - Internal			
Use this section to record the impact this policy, project, decision or activity might have on people who have characteristics which are protected by the Equality Act.			
Protected Characteristic	Impact: positive, neutral or adverse	Reason for the impact	What information have you used to come to this conclusion?
<i>Example: Age</i>	<i>Adverse</i>	<i>Moving this service online will adversely affect older people, who are least likely to have access to a computer or smart phone and may not be able to use the new service.</i>	<i>GLA Datastore: X% of the London community are aged 70 or over. GLA data shows that only 10% of those over the age of 70 have regular access to a computer or smart phone.</i>
Age (younger, older or particular age group)	██████████	██████████ however it will be monitored to assess if there are unforeseen impacts on older or younger staff. The views of staff will be heard from	LFB information provided by Peoples Services dated January 2020.

		a variance of channels which will allow all age groups in the service to be engaged with in an inclusive way (considering preferences for younger and older staff may not be the same). Any changes to the way in which LFB work will consider impacts on age however this is expected to be neutral through individual equality impact assessments.	
<b>Disability</b> (physical, sensory, mental health, learning disability, long term illness, hidden)	Neutral	There are no changes to the routine of how disabilities are reviewed and the current measures to assist disabilities will be utilised, paying attention to how people with disability may wish to engage over a variety of communications. These protected characteristics are reviewed internally by HR monthly. Practices will be utilised during any briefings or meetings to best assist e.g. software to aid learning. E.g. we will aim to assist HoH/visually impaired staff to have available equipment to facilitate ease of working. Qualitative and quantitative data and guidance will be sought from Learning Support department.	LFB equalities information provided by Peoples Services dated January 2020. 7.25% of all staff have reasonable adjustment in place (which is indicative only – all neurodiversity is currently not recorded) - LFB equalities information dated January 2020. Indicative data is that representation is slightly less than London statistics.
<b>Gender reassignment</b> (someone proposing to/undergoing/ undergone a transition from one gender to another)		We will ensure that language is inclusive when communicating about the implementation of the CRMP and avoid unnecessarily gendered terms to ensure staff identifying outside of a binary gender are not excluded. It is likely there will be a neutral impact on this group.	We have only started recently to record transgender statistics and have yet to consider declaration rates.
<b>Marriage / Civil Partnership</b> (married as well as same-sex couples)		It is likely there is a neutral impact on this group as the project will not affect marital, partnership or single status in any different way.	No information collected
<b>Pregnancy and Maternity</b>		No change to the usual policy in relation to this point. Staff who are pregnant or on maternity will not be involved in operational duties and will not	Awaiting data report from Anna Tapp (AT).

		be affected. Any shift change implications will be assessed.	
<b>Race</b> (including nationality, colour, national and/or ethnic origins)		Although the project itself will not have a disproportionate impact on BAME staff it should be noted that there is a lack of representation of BAME employees at senior tiers of the organisation, and that BAME men are disproportionately represented in statistics relating to dismissals. The LFB Ethnicity Pay Gap Report 2019, although demonstrating no overall ethnicity pay gap, does demonstrate a small pay gap in favour of white staff in part time FRS and/or Control roles. The project will ensure language is inclusive throughout the project and consider the impact on the different communities represented within the LFB and workshops to avoid excluding any groups. The project will take into account the lack of representation of BAME employees and seek views and consultation by engaging with our ESGs including B&EMM, Fairness, AFSA etc. We will be clear as to further breakdowns of ethnicity where appropriate and as advised by our communications colleagues, consider where or if the use of the term BAME is appropriate in the CRMP.	5824 staff, 16.45% are BAME Control staff =14.02% BAME Operational staff: FRS staff:
<b>Religion or Belief</b> (people of any religion, or no religion, or people who follow a particular belief (not political))	Negative – although the issue around facial hair is justified under national safety BA regulations	It is likely there will be a neutral impact on religious groups, in relation to timings of prayer and particularly those who adhere to religious requirements relating to facial hair and hair coverings (e.g. hijabs). Employment law is taken into account. The public sector equality duty requires contractors to consider the impact of protected characteristics on staff and we will consider policies in relation to it.	Awaiting data report from AT

<p><b>Sex</b> (men and women)</p>		<p>There is a lack of representation of women in the brigade for the operational staff group. However Control is over represented by women, FRS staff roughly has an even split. We will ensure language is inclusive throughout the project and run workshops to avoid excluding any groups, including the use of unnecessarily gendered language. Positive action opportunities to be explored in the future to facilitate a more balanced workforce and encourage participation when looking at options for working and new methodologies in relation to this CRMP which will be outlined in further papers and EIAs.</p>	<p>Total workforce equates to 16.74% Women Control 22.43% are Male LFB Data.</p>
<p><b>Sexual Orientation</b> (straight, bi, gay and lesbian people)</p>		<p>It is likely there will be a neutral impact, No change to current policy and procedures. We will ensure language is inclusive, neutrally gendered throughout the project.</p>	<p>Total staff across all departments and groups 5.36%</p>

### 5b. Assessing Equality Impacts - External

Use this section to record the impact this policy, project, decision or activity might have on people who have characteristics which are protected by the Equality Act.

Protected Characteristic	Impact: positive,	Reason for the impact	What information have you used to come to this conclusion?
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	<b>neutral or adverse</b>		
<i>Example: Age</i>	<i>Adverse</i>	<i>Moving this service online will adversely affect older people, who are least likely to have access to a computer or smart phone and may not be able to use the new service.</i>	<i>GLA Datastore: X% of the London community are aged 70 or over. GLA data shows that only 10% of those over the age of 70 have regular access to a computer or smart phone.</i>
<b>Age</b> (younger, older or particular age group)	Positive	There will be monitoring to assess if there are unforeseen impacts on older or younger Londoners. The CRMP EIA will endeavour to consider ways in which protected groups such as older people, and how the at risk groups such as elderly and living alone are impacted through the lifetime of the document. Impacts on all age groups will be considered and mitigation to take place if needed. It is likely there will be a positive impact – older people are over represented in fatal fires so it is likely that a CRMP that considers older people will have a positive impact.	Add GLA age demographic data. The GLA projects that, in 2019, over a fifth of London's population are under 16 (1.9 million). Over two-thirds, or 6.2 million, are working age (aged between 16 and 64), and less than one in eight are 65 or over (1.1 million). Despite being the smallest age group in London's population, the number of Londoners aged 65 or over is projected to increase by 86 per cent between 2019 and 2050, faster than younger age groups. Therefore, there will be a growing need for infrastructure that supports an ageing population, including accessible transport and housing, as well more inclusive employment practices.
<b>Disability</b> (physical, sensory, mental health, learning disability, long term illness, hidden)		There are no changes to the routine of how disabilities are reviewed and the current measures to assist disabilities will be utilised. Practices will be considered during any briefings or meetings to best assist e.g. software to aid learning or venue selection for engagement E.g. we will aim to assist HoH/visually impaired people in communities to have available equipment to facilitate ease of working and understanding and to allow participation. Any engagement will include the views of Londoners with disabilities to ensure that impacts are recognised and mitigated. The impact on our neurodiverse communities will be considered. We will ensure	Add GLA disability data. There are 1.3 million disabled adults in London, defined according to the Equality Act as having a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on their ability to do normal daily activities. Disability is closely related to age: 13 per cent of the working age population are disabled versus 28 per cent of people aged 65 or over.



		representative participation of disabled Londoners in the consultation/delivery process by considering accessible formats, assessing needs, venues, etc.	
<b>Gender reassignment</b> (someone proposing to/undergoing/ undergone a transition from one gender to another)		We will ensure that language is inclusive when communicating about the implementation of the project and avoid unnecessarily gendered terms to ensure Londoners identifying outside of a binary gender are not excluded. It is likely there will be a neutral impact on this group.	There are no current data sources on gender identity in London or the UK as a whole. Research carried out in 2012 on the acceptability of gender identity questions in surveys provided an indicative estimate that 1 per cent of the UK population identify as trans.
<b>Marriage / Civil Partnership</b> (married as well as same-sex couples)		It is likely there is a neutral impact on this group as the project will not affect marital, partnership or single status in any different way.	In 2019 there were a total of 383 civil partnerships in London Boroughs, the highest being in Islington – London Datastore.
<b>Pregnancy and Maternity</b>		No change to the usual policy in relation to this point. Londoners who are pregnant or on maternity leave will not be adversely affected	Awaiting response from Anna Tapp (February) and will use GLA data.
<b>Race</b> (including nationality, colour, national and/or ethnic origins)		The project will ensure language is inclusive throughout the project and workshops to avoid excluding any groups and consider ways to engage with all ethnically diverse groups considering there are around 300 languages spoken in London . The project will take into account the lack of representation of BAME employees and seek views and consultation. Equalities support groups to be consulted for advice. We will consider how to engage effectively with BAME Londoners in light of: 1) Grenfell, 2) Culture Review and Jaden’s death, 3) the publication of the race and ethnic disparities report ( <a href="https://www.gov.uk/government/publications/the-report-of-the-commission-on-race-and-ethnic-disparities">https://www.gov.uk/government/publications/the-report-of-the-commission-on-race-and-ethnic-disparities</a> ) which includes recommendations for public bodies (including on consultation and stopping using BAME as a term).	The GLA projections estimate that, in 2019, 57 per cent of Londoners have a white British, white Irish or other white ethnicity, with the remaining 43 per cent having a black, Asian or minority ethnicity (BAME).

<p><b>Religion or Belief</b> (people of any religion, or no religion, or people who follow a particular belief (not political))</p>	<p>Neutral</p>	<p>We will consider how to limit impact on groups over religious festivals, when engaging. We can make best use of our existing community groups to ensure representation and consider positive action to encourage good engagement.</p>	<p>It is noted that some areas of London hold higher numbers of a particular religious group, for example Barnet has the highest Jewish community numbers and New Malden the highest Korean population which is predominantly non-religious, with 23 % Buddhist and 29% Christian. The views of each person are equally valued and that for proportion of views purposes it may be necessary to direct engagement in highest populated areas, this is not to suggest that the views are of lesser or more value. Nearly half of London’s residents, 48 per cent, give their religion as Christian. Muslims account for 14 per cent and all other religions total 12 per cent. People stating no religion make up the remaining 26 per cent. The proportion of Londoners who are Muslims or who have no religion has increased in recent years, while the proportion who are Christian has declined.</p>
<p><b>Sex</b> (men and women)</p>		<p>We will ensure language is inclusive throughout the project and run workshops to avoid excluding any groups, including the use of unnecessarily gendered language. Positive action opportunities to be explored in the future to facilitate a more balanced workforce and encourage participation from said groups. Gender specific groups to be contacted through engagement to seek views and opinions.</p>	<p>Gender: in 2019, the GLA projects that 4.55 million Londoners are female and 4.55 million are male. Women face particular issues around gender-based violence and low pay. As the majority of lone parents (90 per cent) are women, recent reforms to welfare that have affected lone parents have had a disproportionate impact on women. Women sharing other characteristics women often face additional challenges, such as higher gender pay gaps among older and BAME women. Young women report issues around financial pressures and</p>

			mental health issues. Men face issues around lower educational attainment, and are at higher risk of suicide.
<b>Sexual Orientation</b> (straight, bi, gay and lesbian people)		It is likely there will be a neutral impact, No change to current policy and procedures. We will ensure language is inclusive neutrally gendered throughout the project (and use the gender bias tool).	2 per cent of adult Londoners identify as gay or lesbian, higher than the UK rate of 1.3 per cent. A further 0.6 per cent identify as bisexual and 0.6 per cent as other sexual identities. <sup>15</sup> A recent survey of the UK's LGBT population found that 40 per cent had experienced an incident such as verbal harassment or physical violence because they were LGBT, and that they had lower levels of life satisfaction than the general UK population.

<b>6. Impacts outside the Equality Act 2010</b>
<b>What other groups might be affected by this policy, project, decision or activity?</b>
Consider the impact on: carers, parents, non-binary people, single people, people with learning difficulties, people with a neurodiversity, people with dyslexia, autism, care leavers, ex-offenders, people living in areas of disadvantage, homeless people, people on low income / in poverty.
We will meet and listen to all staff support groups and representative bodies to ensure that their views are heard by the engagement team. Andy Mobbs / Anna Tapp - to assist with data. Intersectionality will also be considered.

<b>7. Legal duties under the Public Sector Equality Duty (s149 Equality Act 2010)</b>
How does this work help LFB to:



<p><b>Eliminate discrimination?</b></p>	<p>Engagement is a key element of ensuring we eliminate discrimination through key stakeholder engagement, community engagement, staff engagement and a thorough consultation process that accommodates the views and directs decision making. This will also be demonstrated through EIAs specific to decision making, Borough EIAs, and co-production.</p> <p>DRAFT</p> <ul style="list-style-type: none"> <li>• We will provide accessible, inclusive and appropriate services to meet the needs of London's diverse communities.</li> <li>• We welcome, celebrate and respect diversity.</li> <li>• We will promote equality of opportunity.</li> <li>• We oppose discrimination.</li> </ul> <p>Subject to our legal obligations, we will promote diversity and oppose discrimination, particularly discrimination based on age, disability, ethnicity, gender, gender reassignment, marital status/civil partnership, maternity, nationality, religious or political belief, sexual orientation, socio-economic circumstances or caring responsibilities. LFB has zero tolerance on discriminatory types of behaviour.</p> <p>We will challenge prejudiced beliefs about different groups and different communities in society. We will take positive action, in the delivery of our service to promote good relations between people from different communities who live in London and also between people from different communities who work for us.</p>
<p><b>Advance equality of opportunity between different groups?</b></p>	<p>We will <b>encourage persons to participate in public life or in any other activity in which participation by such persons is disproportionately low'</b></p> <p>Positive action in relation to identification of communities and groups with protected characteristics and engagement with them will support advancement of opportunity between different groups.</p>
<p><b>Foster good relations between different groups?</b></p>	<p>Consultation through active engagement with different groups with protected characteristics (as set out in Borough Plans and accompanying EIAs, internal consultation and engagement with stakeholder groups, including ESGs, RBs and other, interested parties will support fostering good relations.</p>

<b>8. Mitigating and justifying impacts</b>		
Where an <b>adverse</b> impact has been identified, what steps are being taken to <b>mitigate</b> it? If you're unable to mitigate it, is it <b>justified</b> ?		
<b>Characteristic with potential adverse impact (e.g. age, disability)</b>	<b>Action being taken to mitigate or justify</b>	<b>Lead person responsible for action</b>

**Now complete the RAG rating at the top of page 1:**

**High:** as a result of this EIA there is evidence of significant adverse impact. This activity should be stopped until further work is done to mitigate the impact.

**Medium:** as a result of this EIA there is potential adverse impact against one or more groups. The risk of impact may be removed or reduced by implementing the actions identified in box 8 above.

**Low:** as a result of this EIA there are no adverse impacts predicted. No further actions are recommended at this stage.