



LONDON FIRE BRIGADE

Report title

## Proposal on the Recommencement of Trainee Firefighter Recruitment

Report to

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

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Report by

Assistant Director, People Services

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I agree the recommended decision below.

**Andy Roe**  
London Fire Commissioner

Date **This decision was remotely signed on 22 December 2021**

### Executive Summary

To meet the residual budget gap of £5.9m in 2021/22 increasing to £14.7m in 2022/23, a recruitment freeze was proposed for two years and approved for Operational staff effective from April 2021. This report outlines the impact to the operational establishment as part of that freeze when considered alongside the upcoming Firefighter pension remedy and recommends that firefighter recruitment and training is restarted to minimise future impact, in light of further progress regarding the overall budget forecast.

. If this recommendation is agreed it is forecast that savings would still be achieved in excess of those set out in the 2021-22 budget report, by £2,487,000 in 2021-22 and £5,475,000 in 2022-23.

Recommended decisions

For the London Fire Commissioner

1. That the London Fire Commissioner ends the current recruitment freeze and recommences Firefighter Development training at LFB, with an intake of 84 candidates this year at a cost of £681,607 in 2020/21 and 288 candidates per year from 2022/23 at a cost of £2,337,000.
2. That additionally, the London Fire Commissioner agrees there will be a focus on attracting transferees from other FRS via a recruitment process; to be considered after initial TFF intake and dependent on skills and numbers required.

## **Introduction and Background**

1. In light of the London Fire Brigade (LFB) residual budget gap of £5,900,000 in 2021-22, increasing to £14,700,000 in 2022-23, an operational recruitment freeze was proposed for two years, from April 2021 to March 2023. This was included in LFB's November 2020 Budget Submission to the Mayor (LFC-0432) and the March 2021-22 Budget Report (LFC-0505x).
2. The recruitment freeze for operational staff set out to result in total reductions in operational staff spend of £14,700,000 over two years, based on a start date of April 2021. The implications of this on operational response are set out later in this report.
3. This assumption was based on the fact that the savings from any recruitment freeze would not be offset through the use of additional overtime, and that staff shortages at stations and potential crewing shortages would not be fixed through the use of pre-arranged overtime (PAO). However, the actual shortfalls have been greater than anticipated in areas such as Covid-19 sickness, self-isolation and support for the Ambulance Driver Assistance programme. This has generated additional demand on PAO on top of the recruitment freeze.
4. Maintaining the recruitment freeze would therefore result in an average operational workforce reduction of 108 staff in 2021-22 and 296 staff in 2022-23. This can be seen in the context of other previous operational vacancy levels of 238 in January 2018 and 229 in December 2013. This would potentially lead to nine pumping appliances becoming unavailable for operational response ("off the run") in 2021-22 and 25 in 2022-23.
5. The impact on vacancies has been closely monitored, and LFB's People Services department has been producing a range of forecasting scenarios to understand the impact on operational vacancies over the next two to three years.
6. In addition to this, the pension remedy that will be required following the successful discrimination claim (McCloud/Sargeant) by the FBU, in connection with the transitional arrangements applicable to the 2015 Firefighters Pension Scheme, is expected to take effect from 31 March 2022 and may potentially result in a significant number of employees retiring from the organisation. It should also be noted that this exceptional retirement profile will be weighted with staff holding specialist skills and more senior ranks within the Brigade, a full breakdown of skills and ranks has been constructed by Central Operations and People Services. With the addition of the pension remedy impact, the average vacancies for 2021-22 would increase to 165 compared to normal leaver rates of 108; and for 2022-23 would increase to 635 compared to normal leaver rates of 296 (alongside the continued recruitment freeze).

7. As a result of the decision to freeze recruitment, the last firefighter course in the programmed set of courses started on 26 April 2021 and these trainees have now been posted to station. There were a further 16 trainees who had been paused on their training process. These are undertaking training through July to November and all will be posted by November 2021.
8. In light of further information regarding the overall budget forecast and the impact of the McCloud/Sargeant case, the Brigade has reviewed the impact of the recruitment freeze against potential savings, to maintain the future operational establishment.
9. This report, therefore, recommends ending the current recruitment freeze and recommencing FFD training from January 2022, with 84 candidates this year and at a full intake of 288 candidates per year thereafter. If this recommendation is agreed, it is forecast that savings would still be achieved in excess of those set out in the 2021-22 budget report, by £2,487,000 in 2021-2022 and £5,475,000 in 2022-2023. If recruitment was maintained there would then be a shortfall in achieving the £14,700,000 reduction in the 2023-24 financial year of £3,112,000, which would be considered as part of the budget process. Retirement and recruitment rates will be monitored closely by LFB, and if retirement rates are lower than expected and savings will be impacted, recruitment may be slowed down or paused.
10. The report also recommends focusing on attracting transferees from other fire and rescue services (FRSs), if agreed and 50 transferees were to be employed from June 2022 this could result in underachieving the savings set out in the 2021-22 budget report by £2,117,000 in 2022-23 and £2,841,000 in 2023-24. Recruitment of any transferees will therefore be monitored and controlled to ensure they do not negatively impact the budget position.
11. Additional detailed information on the Financial Impact can be found from paragraph 32 of this report.

### **Establishment impact**

12. Table 1 below outlines the potential impact to the operational establishment over the next three years because of the recruitment freeze and pension remedy.
13. This is based on total operational vacancies. Station vacancies will be higher than non-station vacancies. The vacancies are set against the known establishment at this time with no future changes e.g. budget adjustments, assumed.
14. The retirements forecast due to the pension remedy is based on 578 employees being eligible to retire between 1 April 2021 and 31 March 2022 (those staff having 25 years' service, aged 50 and having been employed as at 31 March 2012 in any FRS). The forecast works to an assumption of between 70% and 80% of this group retiring during or at the end of 2021/2022. The figures in this report are based on the higher rate of 80% and therefore are at the maximum of what the Brigade would expect to occur.
15. It is of course challenging to predict how many people will choose to retire. In addition, the Brigade may see the spread of retirements extending beyond 31 March 2022.
16. Within the group of 578 employees, 188 have full protection under the 1992 Firefighters' Pension scheme. The remaining 393 employees were affected by the transitional arrangements to the 2015 scheme. This may therefore impact on the retirement patterns that evolve for each group although it is difficult to assess exactly how this may look. This will also be affected by the decision around Immediate Detriment.

17. There are a small number of employees, approximately 40, who become eligible for retirement under the current criteria but between 1 April 2022 and October 2023 (the date by which the provisions are due to be implemented). The impact on vacancies will be minimal as the retirements will be over an 18 months period and therefore can be built into standard retirement forecasts.

Table 1: Vacancy forecast to March 2024 with current recruitment freeze to March 2023 and pension remedy impact at March 2022

As at quarter	Vacancies
Jun 2021	-78
Sep 2021	-123
Dec 2021	-178
Mar 2022	-566
Jun 2022	-599
Sep 2022	-629
Dec 2022	-660
Mar 2023	-693
Jun 2023	-714
Sep 2023	-663
Dec 2023	-624
Mar 2024	-597

18. Alongside the impact on overall vacancies, Establishment Board has also been discussing the wider impact of the pension remedy on the organisation, in particular for senior roles, and the flight risk to other FRS due to the national impact of the remedy and other FRS also looking to fill large numbers of vacancies. This work will form part of the deep dive on the succession / workforce planning risk which is currently being developed.
19. LFB requires a minimum of 746 staff on duty for each shift, at fire stations, in order to maintain all pumping and specialist appliances on the run. In order to achieve this and also enable suitable safety critical training and exercising, other unplanned release for activities such as staff medicals and fitness tests along with the planned uptake of leave and forecast sickness levels, LFB employs 1106 members of staff on each shift.
20. The current vacancy levels are impacting LFB's ability to maintain all pumping and specialist appliances which is being managed in line with guidance for duty officers to ensure resources are targeted in an efficient and consistent manner. As set out in Paragraph 1.4 the impact of this, allied with firefighters not being available for reasons connected to Covid-19, has been greater than expected and hence has been mitigated each shift via the use of PAO, although the sustainability of this mitigation is beginning to become an issue due to decreasing appetite for voluntary PAO within the workforce. The continued recruitment freeze along with the increasing impact of the upcoming pension remedy will increase the impact the vacancy margin has on all areas of LFB's service outlined above, amplified by the impact the pension remedy has on higher ranked and higher skilled officers and firefighters.

21. At this stage, a decision to re-start recruitment will still see a continued challenge to LFBs establishment and skills management due to the lead in time to recruit new firefighters and also the time taken for these firefighters to acquire the specialist skills required. This acquisition of specialist skills, such as Motor Driver, Fire Rescue Unit and Command Unit qualifications can take years and is, ordinarily undertaken following completion of the necessary core skills development. The blended and coordinated approach of FF(d) recruitment and transferee recruitment will go some way to reduce the impact here.

### Diversity impact

22. Furthermore, People Services have also modelled the impact on diversity should the recruitment freeze remain in place. Over the last few years, significant progress has been made to increase the diversity of new recruits. This has resulted in an increase of 1.74% in the number of female operational staff, 1.15% of Black, Asian and Minority Ethnic staff and 0.84% of LGB staff between 1 January 2019 and May 2021. This trend was expected to continue year on year.
23. Table 2 shows the potential impact on diversity with and without recruitment, and demonstrates that continuing with the recruitment freeze is likely to stall progress on improving the diversity of new recruits.

Table 2: *Impact on diversity (lifted from the People Services Performance Report Q4 2020-21)*

	Women	Black, Asian and Minority Ethnic	Disabled	LGB
March 2019	7.4%	13.1%	5.5%	4.8%
March 2020	8.0%	13.4%	6.0%	5.1%
March 2021	8.9%	14.4%	6.2%	5.5%
March 2022 with recruitment	9.9%	15.5%	5.9%	5.7%
<i>March 2022 without recruitment</i>	<i>9.1%</i>	<i>14.4%</i>	<i>5.9%</i>	<i>5.5%</i>
March 2023 with recruitment	10.7%	16.5%	5.7%	6.0%
<i>March 2023 without recruitment</i>	<i>9.2%</i>	<i>14.5%</i>	<i>5.7%</i>	<i>5.6%</i>

### Skills and officer impact

24. The firefighter recruitment freeze will further impact on future driver skills levels. Whilst new firefighters are contractually required to become drivers, the link between fulfilling this element of their contract and achieving competence in role and competent rate of pay was removed in 2019.

25. Additionally there are a range of specialist skills held by relatively small proportions of the workforce which will be disproportionately impacted by the pension remedy, exaggerated by the recruitment freeze. For example, Fire Rescue Unit (FRU) full establishment is 932 with a forecast of 88 retirements on or before the pension remedy – a 9.4% loss, this is on top of an existing 20.8% skills gap in FRU.
26. This picture is repeated at officer ranks with the more senior officer ranks more significantly impacted.
27. It should be noted that restarting firefighter recruitment will not immediately positively impact on skills and officer numbers. Options 1 and 2 will be a longer-term solution to maintaining levels, therefore there needs to be an approach to mitigate the immediate shortfalls, as shown in Option 3. The draft Recruitment Strategy includes detail on the recruitment of transferees from other FRS to meet skills gaps and officer vacancies.

### Recommended option

28. Following consideration of Option 1 below and the further options set out in Alternative Options Considered (30.), both People Board and Commissioner's Board concluded that Option 1 presented, on balance, the preferred option with which to move forward, to help mitigate the impact of the recruitment freeze on the operational establishment (including the impact of the pension remedy), diversity, and future skills levels. In addition, Option 1 still ensures LFB meets (and exceeds) the savings target for 2021/22 and 2022/23.

<b>Option 1:</b> To recommence FF(D) training from November 2021. To utilise an existing pool of candidates from previous Outreach work to populate courses in November and December 2021 and to launch a new recruitment process in Autumn 2021 to populate FF(D) courses from January 2022, alongside a focus on attracting transferees from other FRS.	
<b>Benefits</b>	<b>Risks/Issues</b>
Start to fill firefighter vacancies earlier, maintaining future throughput with vacancies reaching 333 in March 2023, reducing to 177 in March 2024 (see Table 3)	Insufficient time to put in place all the recommendations from the FF(D) review, lead-in time required for Babcock to implement changes, as highlighted in corporate risk P1. However, some immediate changes have already been made to mitigate the risks identified in the FF(D) review
Training courses remain scheduled as planned with Babcock for the remainder of 2021	Lack of lead in time for successful Outreach work, however this is mitigated somewhat by the outreach team having maintained talent pools
Savings target is exceeded in 2021/22 by £1.3m, with £7.2m savings against the target of 5.9m. In 2022/23 the savings target would be exceeded by £3.3m, at £18m compared to £14.7m (see Table 4)	Insufficient time to review and implement eligibility criteria and assessment standards, including LGV/medicals

Candidates from the existing recruitment pool allocated to earlier courses in 2021, will allow training and recruitment resources to remain in place and skilled, as well as completing the 2019 campaign	Firefighter recruitment is due to be reviewed to ensure assessment criteria/ability tests remained current. An earlier start date than April may not give sufficient time to do this and implement, although assessment team resource has been secured. This is due for completion in October 2021
	Due to the recruitment freeze impacts on Babcock, they require notice as soon as possible to secure trainer resources
	Due to the recruitment freeze, the number of Fitness Advisors has reduced and there is not currently capacity to run fitness tests for new FF alongside the RPMs which have restarted. To mitigate this, two FF will be required on secondment from September 2021 onwards.

## Transferees

29. In addition to Option 1 it is recommended that a focus is given to attracting transferees from other FRS. Transferee processes at FF rank have taken place on an ad hoc basis in previous years where there has been a demand for higher intake numbers but has not been done on a regular basis alongside each TFF process.
30. It is recognised there are challenges with transferee processes, based on previous outcomes, including a potential lack of diversity and high fallout rates during the process. A review of the transferee process and the conversion course is required to make this route successful. Currently there is two-week conversion course in place for transferees at this level. There may also be a challenge in securing this course provision from Babcock given the current priorities of the training course schedule.
31. In the two 2017 firefighter transferee rounds, one campaign had a success rate of 24% and the other only 15%, from an applicant list of around 150 each time. The main drop-out stage is at online tests, 32-47% failed here (see Appendix 1). This data should inform how we approach a new transferee process, including selection, to ensure it delivers the numbers we need. An equality impact assessment is due to be run for the online tests to ensure no negative impact on under-represented groups.
32. Therefore any new process must respond to these challenges and ensure that the benefits of working for LFB are promoted to attract good quality candidates, especially at a time when other FRS will be looking to recruit new staff due to the pension remedy impact. Anecdotal evidence suggests that non-LFB FRS staff view and consider LFB to be an employer of choice.

## Alternative Options Considered

33. Whilst Option 1 has been identified as the preferred option, there is clearly a balance to be struck between the benefits and risks of each option. The following options were considered by People Board and Commissioner's Board. The increasing number of vacancies and potential impact of the pension remedy in March 2022 informed the preferred decision of Option 1.

<b>Option 2: Start TFF recruitment in April 2022 at the full intake of 288 a year, alongside a focus on attracting transferees from other FRS</b>	
<b>Benefits</b>	<b>Risks</b>
Better lead in time for Outreach to successfully target hard to reach groups and work with partnerships to increase diversity intake	Higher vacancies for a longer period reaching 465 in March 2023 and reducing to 309 by March 2024 (see Table 3)
Recommendations from FF(D) review will be underway and/or complete	Later intake impacts on increasing MD skills shortage
Greater certainty that courses will be filled to maximum numbers as there will be a longer lead in time to recruit and assess, creating a talent pool to feed through to course allocation	Babcock have a cohort of employed trainers who they will need to redeploy or potentially make redundant if the Fire Fighter Development Programme is not run for a considerable length of time. Currently it is still undertaking "mop up" courses for the people previously recruited but the last of these will be running in July and September. This may lead to skills gap once recruitment starts again if there is a significant time lapse in between
Further savings are created of £8.7m, or £2.8m above the target savings of £5.9m in 2021/22. In 2022/23 the savings would be £24.5, £9.8m above the target of £14.7m (see Table 4)	Due to the recruitment freeze, the number of Fitness Advisors has reduced and there is not currently capacity to run fitness tests for new FF alongside the RPMs which have restarted. To mitigate this, two FFs will be required on secondment from January 2022 onwards.
	Securing transferee courses from Babcock alongside the current course scheduling priorities

**Option 3** – Specific transferee intake in January 2022 with trainee intake commencing in April 2022

Detail: Commence targeted external transferee recruitment in 2021 for Firefighters holding "in demand" skills such as MD, FRU etc. as well as a policy decision to make all



<p>of our promotional processes for all ranks open to external applicants with consideration taken for applicants already competent in the rank being applied for.</p> <p>Review of the FFD course and associated development pathways for trainee firefighters to run concurrently with this work to re-commence FFD recruitment from April 2022 with a refreshed development pathway for trainees.</p> <p>Option 3 assumes an intake of 200 transferees in January 2022.</p>	
<b>Benefits</b>	<b>Risks</b>
Intake of competent firefighters with the requisite skills including driving	Intake will draw from other FRS who are also affected by the pension remedy and the need to maintain establishment
Faster process from hire to station posting	A significant intake would need to be achieved to make this a success and meet the MD shortfalls. Previous transferee rounds have not been lucrative. See paragraph 28
Faster reduction of vacancies, with vacancies forecast to be at 265 by March 2023 and 109 at March 2024	A review of the transferee process and the conversion course is required prior to recruitment.
	Ability to secure transferee conversion courses from Babcock alongside the current course scheduling priorities.
	Savings target is not achieved. In 2021/22, savings would be £4.5m against the target of £5.9m. In 2022/23 this would be £14.4m against the target of £14.7m
	Achieving 200 transferees from other FRS during a period where all FRS will see high numbers of retirements could be challenging based on success rates from previous campaigns

<b>Option 4 - 'Do nothing':</b> Continue the recruitment freeze as planned until March 2023	
<b>Benefits</b>	<b>Risks</b>
Better lead in time for Outreach to successfully target hard to reach groups and work with partnerships to increase diversity intake	Higher vacancies for longer period, with vacancies reaching 693 by March 2023 and at 597 by March 2024 (see Table 3)

Recommendations from FF(D) review will be underway and/or complete	Later intake impacts on increasing MD skills shortage
Greater certainty that courses will be filled to maximum numbers as there will be a longer lead in time to recruit and assess, creating a talent pool to feed through to course allocation	Lack of progress on improving the diversity of our workforce
Savings target is exceeded in 2021/22, being £2.8m in excess of the target based on savings of £8.7m against the target of £5.9m in 2021/22. In 2022/23 the savings are forecast at £32.2m against the target of £14.7m	Babcock have a cohort of employed trainers who they will need to redeploy or potentially make redundant if the Fire Fighter Development Programme is not run for a considerable length of time. Currently it is still undertaking "mop up" courses for the people previously recruited but the last of these will be running in July and September. This may lead to skills gap once recruitment starts again if there is a significant time lapse in between
No need to expand the Fitness Advisor team	
Maximum opportunity to review the recruitment process	

### Impact of options on vacancy levels

34. For each of the options, forecasting was undertaken to identify the impact on operational vacancies. The forecasting includes the potential impact of the pension remedy in March 2022.

Table 3:

	Option 1	Option 2	Option 3	Option 4
	Recruitment commence: November 2021 with full intake	Recruitment commence: April 2022 with full intake	Recruitment commence: April 2022 with full intake and transferee round of 200 in 2021	Continued recruitment freeze to March 2023
Jun 2021	-78	-78	-78	-78

Sep 2021	-123	-123	-123	-123
Dec 2021	-178	-178	-178	-178
Mar 2022	-506	-566	-366	-566
Jun 2022	-455	-587	-387	-599
Sep 2022	-413	-545	-345	-629
Dec 2022	-360	-492	-292	-660
Mar 2023	-333	-465	-265	-693
Jun 2023	-294	-426	-226	-714
Sep 2023	-243	-375	-175	-663
Dec 2023	-204	-336	-136	-624
Mar 2024	-177	-309	-109	-597

## Financial Impact

35. The financial impact of each of the three options in the report, along with the impact of no change, have been modelled and are set out in the tables below.
36. The below tables set out a summary of each of the three options against the current budgeted option. It should be noted that the 2021/22 Budget Report only covered the 2021/22 and 2022/23 financial years, for the purposes of this comparison it has been assumed that the expected vacancy levels and saving in 2022/23 are maintained into 2023/24.
37. Table 4 shows the assumed number of average vacancies resulting from each option and the potential financial saving against the full establishment position. The table also shows the base vacancy margin assumption that has been used to calculate the budget in previous years.

Table 4

Financial Year		2021/22	2022/23	2023/24
<b>Base Vacancy Assumptions (2020/21)</b>	<b>AVM</b>	31	31	31
	<b>Saving (£m)</b>	1.6	1.6	1.6
<b>2021/22 Budget Report</b>	<b>AVM</b>	108	296	296
	<b>Saving (£m)</b>	5.9	14.7	14.7
<b>Maintain Recruitment Freeze (£m) (Option 4)</b>	<b>AVM</b>	165	635	659
	<b>Saving (£m)</b>	8.7	32.2	30.4
<b>Option 1 (restart in Nov 21)</b>	<b>AVM</b>	156	402	243
	<b>Saving (£m)</b>	7.2	18	10.1
<b>Option 2 (restart in Apr 22)</b>	<b>AVM</b>	165	530	375
	<b>Saving (£m)</b>	8.7	24.5	16.8
	<b>AVM</b>	82	330	175

<b>Option 3 (restart in Apr 22 with 200 transferees from Jan 2022)</b>	<b>Saving (£m)</b>	4.5	14.4	6.6
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38. Table 5 below then shows what difference each option will have against current budget assumptions. This shows that under Options 1 and 2 savings will exceed the current target in the first two years, with Option 3 showing a financial pressure in each year. Maintaining the recruitment freeze without agreeing further recruitment would result in an additional estimated underspend of £2.8m in 2021/22, increasing to £17.5m in 2022/23 and £15.7m in 2023/24.

Table 5

<b>Financial Year</b>	<b>Maintain Recruitment Freeze (£m)</b>	<b>Option 1 (£m)</b>	<b>Option 2 (£m)</b>	<b>Option 3 (£m)</b>
2021/22	2.8	1.3	2.8	(1.4)
2022/23	17.5	3.3	9.8	(0.3)
2023/24	15.7	(4.6)	2.1	(8.1)

39. The financial impacts set out here assume that no additional operational overtime is incurred beyond current levels. However, if vacancy levels increase above the position as set out in the 2021/22 Budget Report, additional overtime may be required, offsetting any additional overspend.

40. It should be noted that the figures here also include the financial cost of an increase in trainee numbers as well as the impact on the development margin. These figures also include a high leaver rate forecast, and any change to this leaver rate incurred in practice would have financial implications.

### **Pre-arranged Overtime impact of ongoing recruitment freeze**

41. The normal AVM is £1.6m, which would equate to 31 firefighter posts. The AVM is set at a fixed amount, so inflation means that the impact of this has been reducing in real terms over time. Based on the budgeted AVM level for 2021/22 this would mean that if the recruitment freeze is maintained the organisation would be 57 above the budgeted AVM for the year. If PAO was used to fill all these vacancies this would represent a cost of £4.0m. In 2022/23 the forecast is 339 above the budgeted AVM for that year which would represent a cost of £23.9m for PAO to fill all the vacancies above the budgeted AVM.

42. However, the organisational approach would not look to cover all vacancies with PAO and therefore this cost should be seen as a high-level guide only. It is not possible to provide a fixed figure on what the degradation and vacancies may look like over the period in question, dependent on a range of factors such as planned & unplanned staff absence. Therefore, the PAO figures quoted should be seen as purely high-level figures only. Whilst we seek to

maintain fire cover (appliances available) at all times this is measured against our response targets of 6, 8, 10 and 12 minutes, not against numbers of pumps off the run.

### **Further considerations**

43. There are approximately 42 candidates still in the recruitment process from the previous campaigns who are still required to undertake work related tests and medicals; therefore, the number may reduce.
44. Consideration needs to be taken in producing a detailed marketing plan for roles within the Brigade and in this instance creating a future talent pool for firefighter. Recruitment, Outreach and Communications have previously worked well together to produce campaigns such as 'protecting the future of others' and data analytics to learn from and improve our website and accessibility to information, as highlighted in the Kaizen and Future Thinking research into the barriers to becoming a firefighter.
45. The Brigade should therefore harness this collaboration, producing a detailed marketing and communications plan to reach out to new and existing firefighters. This plan will be presented to the People Board in the Autumn as it will require research, resourcing, and budget. This new approach may therefore be available from early 2022 to feed into the recruitment process.
46. A review of firefighter assessments needs to be conducted in conjunction with the NFCC People Programme and Apprenticeship Standards to set the standard required for entry. This will be varied and will potentially include reintroducing LGV requirements to assist in the longer-term maintenance of driver skills.
47. For MD gaps we are looking at 139 potentially from the pension remedy impact and 160 from those being promoted to Leading Firefighter (if all were MD). To secure replacements for all these via the transferee process we would have to achieve 1000 applicants to gain the 200 successful candidates needed, based on the 2017 outcomes. These candidates will also need to have the right skills. A detailed breakdown of the 2017 rounds can be found in Appendix 1.

### **Future target operating model**

48. Resource modelling indicates that it should be possible to manage the impacts of the vacancies in the short term so that the Brigade can continue to achieve the London-wide attendance standards as set out in the London Safety Plan. Longer term sustainable proposals to manage the impacts will need to be addressed as part of the next integrated risk management plan, which will need to consider our ability to undertake core activities within the context of the changing risk profile of London.

### **Equality Impact**

49. 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.
50. 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.

51. 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.

52. 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:

(a) Eliminate discrimination, harassment and victimisation and other prohibited conduct.

(b) Advance equality of opportunity between people who share a relevant protected characteristic and persons who do not share it.

(c) Foster good relations between people who share a relevant protected characteristic and persons who do not share it.

53. 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:

a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic where those disadvantages are connected to that characteristic.

b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;

c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

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

55. 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:

(a) tackle prejudice, and

(b) promote understanding.

50. The equality impact assessment (EIA) for the overarching proposal will need to factor in all of the required elements detailed in paragraphs 12 to 20 and the pool of people affected in each of these areas. Appendix 2 details an initial EIA that has been compiled in consideration of the proposals within this report, however this will be a living document that will evolve over the life cycle of the recruitment freeze and the introduction of a potential restart option.

## **Finance comments**

56. The 2021-22 Budget Report included a saving of £5,900,000 in 2021-22, increasing to £14,700,000 in 2022-23, because of the recruitment freeze. The report notes that if no

additional recruitment action is taken significant increases in vacancy rates are forecast for 2022-23. This could result in reduced salary costs offset by a material increase in overtime.

57. This report recommends ending the current recruitment freeze and to recommence FFD training from January 2022 at a cost of £681,697 for 84 candidates. For 2022-23, this will be a full intake of 288 candidates at a cost of £2,337,000. If this recommendation is agreed it is forecast that savings would still be achieved in excess of those set out in the 2021-22 budget report, by £2,487,000 in 2021-22 and £5,475,000 in 2022-23. If recruitment was maintained there would then be a shortfall in achieving the £14,700,000 reduction in the 2023-24 financial year of £3,112,000. Any variance to the forecast operational spends in 2021-22 will be considered as part of the budget process and incorporated into the financial position reporting. The impact of any changes to the vacancy forecasts for future years will be considered as part of the budget process.
58. The report also recommends focusing on attracting transferees from other FRSs. If agreed this could result in under achieving the savings set out in the 2021-22 budget report by £2,117,000 in 2022-23 and £2,841,000 in 2023-24. Recruitment of any transferees will therefore be monitored and controlled to ensure they do not impact the budget position.

### **Legal comments**

59. 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.
60. Section 1 of the Fire and Rescue Services Act (FRSA) 2004 states that the Commissioner is the fire and rescue authority for Greater London.
61. The report recommends expenditure exceeding £150k in order to end the current recruitment freeze and to recommence FF(D) training from November 2021 at a full intake of 288 candidates per year.
62. 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").
63. Paragraph (b) of Part 2 of the said direction requires the Commissioner to seek the prior approval of the Deputy Mayor before "[a] commitment to expenditure (capital or revenue) of £150,000 or above as identified in accordance with normal accounting practices...". The decision to undertake the proposed recruitment exercise at a value that exceeds £150,000, will accordingly require prior approval from the Deputy Mayor.
64. The statutory basis for the actions proposed in this report is provided by section 7(2)(a) of the Fire and Rescue Services Act 2004, under which the Commissioner must secure the provision of personnel, services and equipment necessary to efficiently meet all normal requirements for firefighting. Furthermore, under section 7 (2)(b) of the aforementioned Act the Commissioner must secure the provision of training for personnel.
65. The General Counsel notes that the LFC has a contract with Babcock Training Limited dated 28<sup>th</sup> February 2018 for the provision of training and as such FFD courses shall be conducted in accordance with the terms of that contract.

**List of Appendices**

<b>Appendix</b>	<b>Title</b>	<b>Protective Marking</b>
1.	Breakdown of 2017 transferee rounds	None
2.	EIA	None



### Outcome of 2017 transferee rounds

#### Campaign 1 2017

<b>Outcome</b>	<b>Count</b>	<b>%</b>
Did not complete Apollo assessments (online tests)	10	7%
DNA	7	5%
Failed Apollo assessments (online tests)	67	47%
Failed interview	8	6%
Not eligible - did not complete EFAD	13	9%
Not eligible - Retained	3	2%
Successful	22	15%
Unsuccessful at medical	2	1%
WD	7	5%
WD after interview	3	2%
<b>Grand Total</b>	<b>142</b>	

Diversity outcomes - 22 white male, 4 LGB

#### Campaign 2 2017

<b>Outcome</b>	<b>Count</b>	<b>%</b>
Did not complete BSQ and SJT (online tests)	10	6%
DNA	22	14%
Failed BSQ or SJT (online tests)	51	32%
Failed interview	17	11%
Not eligible post-interview after having confirmation from current service	3	2%
Successful	37	24%
WD after interview stage	13	8%
WD/Not eligible	4	3%
<b>Grand Total</b>	<b>157</b>	

Diversity outcomes - 32 white male, 2 Black, Asian and Minority Ethnic male, 3 white females

## 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.

<b>1. What is the name of the policy, project, decision or activity?</b>
<b>Proposal on the recommencement of trainee firefighter recruitment</b>

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

<b>High</b>	<b>Medium</b>	<b>Low</b>	<b>X</b>
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<b>2. Contact details</b>	
Name of EIA author	Keeley Foster
Department and Team	Head of Culture, Talent & Recruitment People Services
Date of EIA	17 June 2021

<b>3. Aim and Purpose</b>	
What is the aim and purpose of the policy, project, decision or activity?	To meet the residual budget gap of £5.8m in 2021/22 increasing to £23.5m in 2022/23, a recruitment freeze was proposed for two years and approved for both Operational and FRS staff effective from April 2021. This report outlines the impact to the operational establishment as part of that freeze when considered alongside the upcoming Firefighter pension remedy and recommends three options to restart firefighter recruitment to minimise future impact.
Who is affected by this work (all staff, specific department, wider communities?)	<i>Some staff, Londoners</i>



LONDON FIRE BRIGADE

**4. Equality considerations:** the EIA must be based on evidence and information.

What consultation has taken place to support you to predict the equality impacts of this work?

Consultation will be ongoing – this is the initial proposal for scoping.

Consultation will occur with ESGs, TUs, and cultural change team and initial consultation with Outreach has been initiated

## 5. Assessing Equality Impacts

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>
<b>Age</b> (younger, older or particular age group)	No impacts are yet included until a first decision is made	<p><i>An extended recruitment freeze will likely impact the draw through of our staff, particularly in more senior ranks. Even though normal reductions of staff through wastage are predicted, there is an anticipated further impact on the work force in general through retirement owing to the pension remedy.</i></p> <p><b>Note – Each option has a different impact on age related groups, as FF tends to attract the younger proportion of our work force, extended delays inevitably age it.</b></p> <p><i>However, engaging too soon on lifting a recruitment freeze may limit diversity across the board where there is insufficient preparation time, noting that from outreach activity which starts with a 4 month attraction period, and on average a 3</i></p>	All data here and below has been provided by People Services and <a href="https://londonfire.sharepoint.com/sites/LFBData">https://londonfire.sharepoint.com/sites/LFBData</a>

		<p><b>month lead in time to appointment, there needs to be a planned lead in time for this activity.</b></p>	
<p><b>Disability</b> (physical, sensory, mental health, learning disability, long term illness, hidden)</p>		<p><i>It is noted that long covid could impact cognitive and physical elements of the recruitment process. Extended lead in times would be beneficial in this area to support applicants and increase attraction, noting potential impacts on groups impacted by long covid. Additionally, considering the potential impact on applicants who may have minor mental health conditions that have been exacerbated by covid, this will need to be considered in scoping activities for any of the solutions opted for by the board.</i></p> <p><b>Note – Each option has a different impact on different disabilities. Delaying recruitment might mean that the older proportion of our workforce may leave (who may have more disabilities, such as hearing impairment etc).</b></p> <p><b>However, engaging too soon on lifting a recruitment freeze may limit diversity across the board where there is insufficient preparation time, noting that from outreach activity which starts with a 4 month attraction period, and on average a 3 month lead in time to appointment, there needs to be a planned lead in time for this activity.</b></p>	<p><i>As at 31/05/2021, 6.31% of operational staff (301), and 7.44% of Brigade staff as a whole (431) are recorded as having a disability.</i></p>
<p><b>Gender reassignment</b> (someone proposing to/undergoing/ undergone a transition from one gender to another)</p>		<p><i>It is unlikely there will be an impact for this protected characteristic, however attracting diverse talent and outreach work ideally needs preparation time and a recognition of lead in time.</i></p>	<p><i>No staffing data in relation to this protected characteristic is included.</i></p>
<p><b>Marriage / Civil Partnership</b> (married as well as same-sex couples)</p>		<p><i>It is unlikely there will be an impact for this protected characteristic</i></p>	<p><i>No staffing data in relation to this protected characteristic is included.</i></p>

<p><b>Pregnancy and Maternity</b></p>		<p><i>It is unlikely there will be an impact for this protected characteristic as pregnant applicants are not recommended to undertake physical elements of our recruitment process</i></p>	<p><i>No staffing data in relation to this protected characteristic is included.</i></p>
<p><b>Race</b> (including nationality, colour, national and/or ethnic origins)</p>		<p><i>Covid- 19 has had an exaggerated impact on this group and as outreach activity has paused, it is imperative that lead in times are considered in order to attract diverse talent. Additionally, recognising intersectional concerns around exaggerated impact on people unable to access gyms to prepare for the physical elements of the tests, particularly black women, there is an additional risk to this group.</i></p> <p><b>Note – Each option has a different impact on diverse ethnicity. Engaging too soon on lifting a recruitment freeze may limit diversity across the board where there is insufficient preparation time, noting that from outreach activity which starts with a 4 month attraction period, and on average a 3 month lead in time to appointment, there needs to be a planned lead in time for this activity.</b></p>	<p><i>As at 31/05/2021, 14.38% of operational staff (686), 28.94% of FRS staff (266), and 13.59% of Control staff (14) are recorded as being either Black, Asian, or from another ethnic minority background. For the total workforce this represents 16.67% of Brigade staff (966). These percentages mean that Black, Asian and ethnic minority staff are under-represented within the Brigade, across all occupational groups, compared to London's population.</i></p>
<p><b>Religion or Belief</b> (people of any religion, or no religion, or people who follow a particular belief (not political))</p>		<p><i>It is unlikely there will be an impact for this protected characteristic</i></p>	<p><i>No staffing data in relation to this protected characteristic is included.</i></p>
<p><b>Sex</b> (men and women)</p>		<p><i>Women have not had access to fitness facilities owing to physical differences. Intersectional concerns exist here around acute impact on women who for example have neurodiversity or other disabilities and ethnically diverse women.</i></p> <p><b>Note – Each option has a different impact on attracting underrepresented groups such as women. Engaging too soon on lifting a recruitment freeze may limit diversity across the board where</b></p>	<p><i>As at 31/05/2021, 8.95% of operational staff (427), and 17.00% of Brigade staff as a whole (985) are women. The percentage of women amongst FRS staff is 52.12% (479) and 76.60% (79) amongst Control staff. The operational percentage means that women are greatly under-represented within the Brigade's operational workforce.</i></p>

		<i>there is insufficient preparation time, noting that from outreach activity which starts with a 4 month attraction period, and on average a 3 month lead in time to appointment, there needs to be a planned lead in time for this activity.</i>	
<b>Sexual Orientation</b> (straight, bi, gay and lesbian people)		Each option has a different impact on attracting underrepresented groups such as our LGB community. Engaging too soon on lifting a recruitment freeze may limit diversity across the board where there is insufficient preparation time, noting that from outreach activity which starts with a 4 month attraction period, and on average a 3 month lead in time to appointment, there needs to be a planned lead in time for this activity.	<i>As at 31/05/2021, 5.60% of operational staff (267), and 5.57% of Brigade staff as a whole (323) are recorded as being Lesbian, Gay or Bisexual.</i>

<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, non-binary people, people with learning difficulties, neurodiverse people, people with dyslexia, autism, care leavers, ex-offenders, people living in areas of disadvantage, homeless people, people on low income / in poverty.
The issue of intersectionality across these groups needs to be considered carefully especially when scoping each of the options, and people on low incomes are particularly impacted by covid, which has an impact on the recruitment process.

<b>7. Legal duties under the Public Sector Equality Duty (s149 Equality Act 2010)</b>	
How does this work help LFB to:	
<b>Eliminate discrimination?</b>	<i>Sufficient time and consideration of how groups will be impacted and introducing an inclusive recommencement of recruitment activities at design stage is imperative. This EIA needs to be a living document that is re-evaluated in line with decision making continuously.</i>

<b>Advance equality of opportunity between different groups?</b>	<i>This is an opportunity to re-engage our outreach team and prepare in a considered way for commencement of recruitment activities</i>
<b>Foster good relations between different groups?</b>	<i>Full consultation is recommended with ESGs, TUs and other specialist teams, such as learning support, and the inclusion team to ensure groups are able to feed into the process, not least because of the issues raised from an intersectional perspective</i>

<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.