



LONDON FIRE BRIGADE

Report title

Disability Pay Gap Reporting 2021

Report to

People Board
Commissioner's Board
Deputy Mayor's Fire and Resilience Board
Audit Committee
London Fire Commissioner

Date

25 November 2021
14 November 2021
18 January 2022
3 March 2022

Report classification:

For Information

The subject matter of this report deals with the following LFB strategic priorities:

The best people and the best place to work

This report reviews the first disability pay gap and sets out the measures we have in place to address the pay gap through our Togetherness Strategy and work plan

Report number – LFC-0635

For Publication

PART I - NON-CONFIDENTIAL FACTS AND ADVICE TO THE DECISION-MAKER

Executive Summary

This report presents LFB's disability pay gap data as of October 2021, and outlines progress and ongoing work in relation to this.

Recommended decision(s)

For the London Fire Commissioner:

That the London Fire Commissioner notes the report.

For the Deputy Mayor:

That the Deputy Mayor for Fire and Resilience notes the report.

Introduction and background

1. The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017 provides the requirement that relevant public bodies (employing 250 people or more) must publish information on gender as outlined below and whilst this is the statutory requirement; the LFB actively publishes more pay gap reporting including disability. The Equality act defines a person is disabled if:
 - they have a physical or mental impairment
 - the impairment has a substantial and long-term adverse effect on their ability to perform normal day-to-day activities
2. For the purposes of the Act, these words have the following meanings:
 - 'substantial' means more than minor or trivial
 - 'long-term' means that the effect of the impairment has lasted or is likely to last for at least twelve months (there are special rules covering recurring or fluctuating conditions)
 - 'normal day-to-day activities' include everyday things like eating, washing, walking and going shopping
3. The LFB has never before published a Disability Pay Gap report in line with the above requirements, and this report will be submitted to the Greater London Authority (GLA) group along with the ethnicity pay gap report and the gender pay gap report. Publication will be externally on the LFB website. The brigade's inclusion strategy, the 'Togetherness' Strategy, commits to publishing the disability pay gap report for 2021 which is also due to be presented to People Board and Commissioners Board, as well as Audit Committee and FRB.
4. The LFB will publish the following data in line with gender pay gap reporting including, where appropriate:
 - a. The difference between the mean hourly rate of pay of disabled full-pay relevant employees and that of not disabled full-pay relevant employees;
 - b. The difference between the median hourly rate of pay of disabled full-pay relevant employees and that of non-disabled full-pay relevant employees;
 - c. Information on the difference in mean and median bonus pay (which is not relevant to the LFB);
 - d. The proportions of disabled and non-disabled full-pay relevant employees in the lower, lower middle, upper middle and upper quartile pay bands.

5. With effect from 1 April 2018, the individual holding the office of London Fire Commissioner (LFC) was appointed by the Mayor of London and is not an employee of the LFC. However, in the interests of transparency, the LFC, the Commissioner's pay has been taken into account for the purposes of this report.

Disability Pay Gap Report

6. The disability pay gap represents the proportion of LFB's work force who self-declare their disability and may access support through our Learning Support Team as well as other facilities. Overall, the London Fire Brigade has a **positive pay gap in favour of disabled staff** in full time roles (-4.77% median and -5.27% mean) , and the opposite for part time roles in **favour of staff with no disability** (10.83% median and 10.23% mean). It is noted that this is not broken down yet by physical or mental diversity and we will consider this in relation to next year's disability pay gap in order to more fully investigate the data.
7. As of September 2021, 8% of LFB staff are disabled, and this is broadly proportionate throughout the salary groups for all staff. 21% of adult working age Londoners consider themselves to be disabled, according to the Office of National Statistics.
8. When broken down by staff groups, our fire and rescue staff (FRS) have the only pay gap in favour of **staff without a disability** across both the mean and median. This means we need to attract more staff with disability into more senior roles in this staff group. Operational and control staff have a positive pay gap in favour of **staff with a disability**, for both full and part time roles. It is likely that this is related to neurodiversity, particularly as a result of the nature of LFB protection work, which means that there is a proportionate percentage of diversity at more senior levels of the organisation. This is broken down in Appendix 1. In control, there are no part time staff who have declared disability, and the numbers are small, so this impacts the figures in single appointments.
9. The biggest pay gap is the part time mean hourly rate for FRS staff at 12.44%; the smallest gap is a median of 0.3% for operational full-time staff.

Togetherness Strategy

10. The main improvement since the previous pay gap reports is the continued delivery of the Togetherness Strategy, a brigade-wide inclusion strategy which underpins the Transformation Delivery Plan. This strategy sets out a significant number of objectives and an ambitious programme of work to achieve, amongst other outcomes, the reduction of both gender, disability and ethnicity pay gaps where they exist. However, the recruitment freeze as a result of COVID 19 have limited outreach work which may impact any improvements to pay gaps in subsequent years.
11. The Togetherness Strategy is supported by a Togetherness Board of strategic senior leaders who are named accountable against the strategy actions, and a Representative Committee comprising staff Equality Support Groups (LFB's staff networks) and representative bodies, including the Disability Working Group (DWG) and the newly approved Neurodiversity group. This coupled with intersectional work across the other groups through events, resources and information provides important support to improve employee experience. The Board have met four times and continue to review and guide Togetherness across the organisation.

Culture review

12. The commitment from the Commissioner to conduct a culture review of the organisation will assess the existing culture of the Brigade and consider the extent to which the Brigade and its employees have created a culture free from discrimination, unfairness and inequality. The review will seek to identify areas for improvement and areas of strength, publishing a report and making recommendations for improvement where appropriate. There is likely to be a focus around the experience of staff who have disability as part of the review.

Recruitment

13. With regards to recruitment into the LFB, the Outreach team are delivering an effective attraction strategy to improve diversity at entry levels into operational roles. Data in the past 18 months demonstrates a large increase in the diversity intake of firefighters. The team are also supporting Control with attracting diversity into their roles. There is ongoing work to develop a strategy to improve diversity into senior roles in FRS and Control positions.
14. The LFB commissioned Right Track to develop and deliver assessor panel training (around inclusion, bias and good recruitment practise) to 50 members of the LFB. This was completed in May 2021. Further to this, a revised version of this training is now being cascaded on an ongoing basis by the Inclusion/Outreach Team to the wider Brigade (every 3 weeks), to ensure those on recruitment panels understand fair inclusive recruitment.

Coaching and mentoring

15. In 2019 we launched a structured Coaching and Mentoring programme across the Brigade. This has created a network of staff, from all staff groups who assist with providing support to staff from all grades. This programme was temporarily delayed and has recently been re-launched. Two streams of the Coaching and Mentoring programme are now available: external coaches from the GLA Coaching Framework for middle managers and above and internal coaching across the organisation. The purpose of the Coaching and Mentoring programme is to improve diversity; career progression coaching; performance coaching and supporting the Leadership interventions. Discussions are in place for collaborative coaching across the GLA, BTP and some FRS's.
16. Reverse mentoring has been shown to be specifically effective in improving the diversity of the organisation and will be an additional offering from the Coaching and Mentoring Network, however, this offering has been delayed until further resources are available to support the stream of development.

Conclusion

17. Whilst the disability pay gap outlined in this report suggests a positive outcome for disabled staff, it is not necessarily reflective of the staff experience (which is reflected in both survey data and frequently reported experience across staff groups) and there are significant actions being undertaken to tackle the disability related issues across the Brigade. The year old Togetherness Strategy and accompanying governance processes are embedding significant change since the 2019/20 pay gap report was published, and LFB expects to continue to

close the pay gaps and improve staff experience through the goals and objectives outlined in this strategy.

Finance comments

18. The Chief Finance Officer has reviewed this report and has no comments.

Workforce comments

19. The subject matter of this report is the workforce, specifically disability pay gaps. The report presents the data relating to the disability pay gap and outlines the ongoing work to address this, as outlined in the Togetherness Strategy and impending Culture Review. Work on this area, specifically in relation to recruitment and prioritisation has been impacted by COVID-19 in the two years covered by the report and reference can be made to the EIAs relating to this. The recognised trade unions will be provided with a copy of this report and any comments received from the trade unions will be reported to People Board and Commissioner's Board as appropriate. The trade unions will continue to be involved in the development and delivery of action plans in respect of the disability pay gap, for example through the Togetherness Representative Committee referred to at paragraph 11 above.

Legal comments

20. Under section 9 of the Policing and Crime Act 2017, the London Fire Commissioner (the "LFC") is established as a corporation sole with the Mayor appointing the occupant of that office. 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.
21. The LFC is a 'relevant public authority' for the purposes of the Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017 (schedule 2 to the Regulations). Regulation 3 and Schedule 1 of the 2017 Regulations set out the obligations on public authorities to publish gender pay gap information relating to employees. Schedule 1 details the type of information to be published.
22. There is no statutory obligation to publish disability pay gap information, but this is good practice, particularly in demonstrating how the LFC meets the Public Sector Equality Duty to advance equality of opportunity. The Commissioner may collate and publish this information towards that end under the general powers contained in section 5A Fire and Rescue Services Act 2004 (FRSA 2004) which empower the London Fire Commissioner to do 'anything it considers appropriate for the purposes of the carrying out of any of its functions...'.

Sustainability implications

23. Although there are no direct sustainability implications arising from this report, the implementation of the Togetherness Strategy aligns with the aims in the LFB's strategies and plans on responsible procurement and sustainability, and we will continue to consult with the Sustainability Team on relevant areas within the Action Plan.

List of Appendices

Appendix	Title	Protective Marking
1.	Disability Pay Gap Report and Action Plan	None

Consultation

Name/role	Method consulted
Insert names/or roles of those consulted, including any with the representative bodies.	Insert how they were consulted – meetings, away day, by email or by draft circulation of this report.
Strategic Inclusion Manager	Report Author
Interim Assistant Director, People Services	Email
Culture Change Team – prior comment	Email
HR Data Team	Email
Legal Team	Email
Head of Industrial Relations	Email
Head of Finance	Email

<p>ORIGINATING OFFICER DECLARATION:</p> <p>Drafting officer Tiffany Oarton has drafted this report and confirms the following:</p> <p>Assistant Director/Head of Service Kate Bonham has reviewed the documentation and is satisfied for it to be referred to Board for consideration.</p> <p>Advice The Finance and Legal teams have commented on this proposal;</p> <p>Tom Davies Legal Advisor, on behalf of General Counsel (Head of Law and Monitoring Officer)</p> <p>Omolayo Sokoya, Financial Advisor, on behalf of the Chief Finance Officer</p>	<p>Drafting officer to confirm the following (✓)</p>
<p>Part 2 Confidentiality: Only the facts or advice considered to be exempt from disclosure under the FOI Act should be in the separate Part 2 form, together with the legal rationale for non-publication.</p>	

Is there a part 2 form – NO



LONDON FIRE BRIGADE

APPENDIX 1: DISABILITY PAY GAP REPORT

LONDON FIRE BRIGADE DISABILITY PAY GAP ACTION PLAN

Introductory Summary

Overall, the London Fire Brigade has a positive disability pay gap in favour of disabled staff, but this does not represent the whole story and must be considered against the backdrop of staff experience. Additionally, when broken down by staff group, the experience of FRS staff, as second biggest staff group, shows a pay gap in favour of staff who do not declare a disability. The mean and the median are in accord in relation to pay gaps in each staff group in both full and part time roles. Further analysis needs to be done to analyse disability data when broken down by group and this will need to be considered for further reports. The following report sets out the data we have captured in full, and the actions LFB are undertaking to tackle the disability pay gap where it exists.

What is the mean and the median?

The mean measures the average pay for someone who identifies as having a disability compared to someone who does not declare their disability. This may be because they do not feel their disability impacts their work.

The median compares the 'middle' pay for an employee with a disability, with the 'middle' pay for an employee that does not declare their disability when all values are distributed from low to high. The median is less affected by outliers than the mean. We report on both median and mean data in this report.

What is the difference between equal pay and disability pay gap?

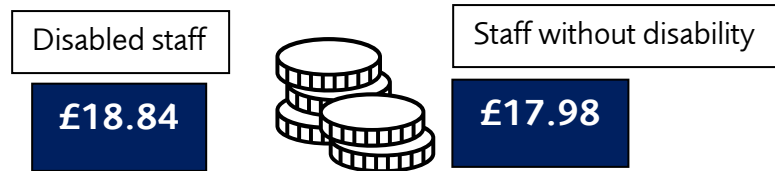
Equal pay measures whether disabled staff and staff without a disability are paid the same for performing work of equal value. We have robust processes in place to ensure we pay our people fairly, including job evaluation and a standardised approach to job grading and reward.

The disability pay gap is different. It measures the difference between the average pay for all disabled staff and staff who do not declare a disability across the Brigade, regardless of their role or seniority.

It is not currently a legal requirement in the UK to report on disability pay gaps (unlike gender pay gap reporting, which is a legal requirement for organisations with over 250 employees) but is considered good practise.

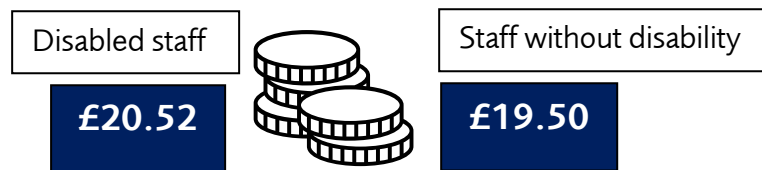
Summary of LFB Disability Pay Gap(s)

Median Hourly Pay (full time): All Staff



What this means: LFB has a **positive** overall median pay gap in favour of **disabled staff** of **-4.77%**.

Mean Hourly Pay (full time): All Staff



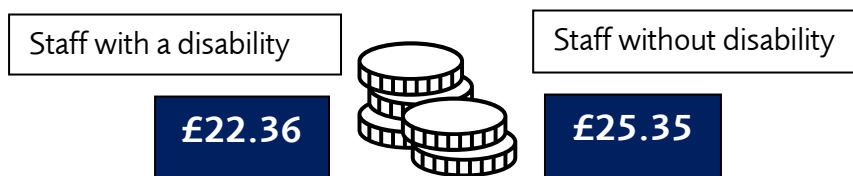
What this means: LFB has a **positive** overall mean pay gap of **-5.27%** in favour of **disabled staff**.

A note on staff groups, full and part time pay gaps

Although the overall LFB pay gap appears to be in favour of disabled staff where they work full time, the part time pay gap is more pronounced and in favour of staff who do not declare a disability. This may be more a true reflection of the pay gap, in so far as where a disability requires a member of staff to work less hours, they are more negatively impacted. There are also significant differences in pay gaps when the data is broken down across different staff groups. It should be noted that small numbers in groupings can distort the data, particularly in control which is the smallest of our staff groups. Two areas are highlighted below, and the report includes full details of all gaps, including some significant hourly pay gaps in favour of white staff.

Largest Pay Gap across staff groups:

Mean Part Time Hourly Pay: FRS



What this means: LFB has a mean pay gap for part time FRS staff of **12.44%** in favour of **staff without a disability** when compared to staff with a disability.

Smallest Pay Gap:

Median Full Time Hourly Pay: Operational

Staff with a disability

£17.95



Staff without disability

£17.90

What this means: LFB has **negligible** median pay gap for full time disabled staff of just 0.3% in favour of staff with a disability.

Full Pay Gap Analysis

- The LFB has published its disability pay gap information (September 2021).

ALL STAFF	Median Hourly Pay Rate (Full Time)	Median Hourly Pay Rate (Part Time)	Mean Hourly Pay Rate (Full Time)	Mean Hourly Pay Rate (Part Time)
Disability	£18.84	£19.16	£20.52	£21.25
No Disability	£17.98	£21.49	£19.50	£23.67
Pay Gap	-4.77%	10.83%	-5.27%	10.23%

- The data has also been broken down by the three main occupational groups within the LFB:

- Operational*: These are firefighters and operational managers. They make up 82% of the workforce. Their terms and conditions are negotiated nationally, and salaries are determined in accordance with role, with no reference to disability or any other personal characteristic.

Operational	Median Hourly Pay Rate (Full Time)	Median Hourly Pay Rate (Part Time)	Mean Hourly Pay Rate (Full Time)	Mean Hourly Pay Rate (Part Time)
Disability	£17.95	£18.16	£19.09	£18.66
No Disability	£17.90	£17.82	£18.51	£18.22
Pay Gap	-0.30%	-1.93%	-3.10%	-2.42%

- FRS (Fire and Rescue staff)*: These are non-uniformed support staff. They make up 14% of the workforce. Their terms and conditions are negotiated locally, and salaries are determined through a job evaluation system (Gauge), with no reference to disability or any other personal characteristic.

FRS	Median Hourly Pay Rate (Full Time)	Median Hourly Pay Rate (Part Time)	Mean Hourly Pay Rate (Full Time)	Mean Hourly Pay Rate (Part Time)
Disability	£22.84	£21.54	£24.52	£22.36
No Disability	£23.57	£24.29	£25.69	£25.53
Pay Gap	3.13%	11.33%	4.57%	12.44%

- c) *Control*: These are 999 call handlers and their managers. They make up 2% of the workforce. Their terms and conditions are negotiated locally, and salaries are determined in accordance with role, with no reference to disability or any other personal characteristic.

Control	Median Hourly Pay Rate (Full Time)	Median Hourly Pay Rate (Part Time)	Mean Hourly Pay Rate (Full Time)	Mean Hourly Pay Rate (Part Time)
Disability	£21.40		£22.29	
No Disability	£19.45	£21.01	£20.31	£21.99
Pay Gap	-10.06%	N/A	-9.74%	N/A

Findings – all staff

- Full time: There is **positive** (-4.77%) overall **median** hourly pay gap in favour of disabled staff and an overall **mean** hourly pay gap **in favour of disabled staff** of **-5.27%**.
- Part time: There is a **median** disability pay gap in favour of staff who have not declared a disability of 10.83% and an overall **mean** hourly pay gap **in favour of disabled staff** of **10.23%**

Median hourly pay

Operational Staff

- In the operational group, 70% of staff are in the firefighter role, and so firefighter pay is the median hourly pay both for staff with and without a disability in the operational staff group. There is a very small range of difference in pay here across full and part time roles and in both the mean and median in favour of disabled staff (**a range of -0.3% to -3.1% overall**). For the median, the full time pay gap in favour of **disabled staff** is **-0.3%** and for part time staff is **-1.93%**.

FRS Staff

- There is a disability pay gap in median full time hourly pay in favour of **staff who do not declare a disability** of **3.13%**. There is a disability pay gap in median part time hourly pay in favour of **staff who do not declare a disability** of **11.33%**.

Control Staff

- Amongst Control staff there is a pay gap in median hourly full time pay in favour of **staff who declare a disability** of **-3.13%**. There are no staff who declare a disability and who work part time; which is an indication of the nature of the smaller numbers in this group. The Control staff group is small (104 in total in September 2021) and represents just 2% of the LFB workforce, so the data can be skewed by individual employees.

Mean hourly pay

Operational Staff

8. Again, the pay gap in **favour of disabled staff** in this staff group for the mean is **-3.1%** for full time operational staff and **-2.42%** for part time staff. There are small differences in pay gaps when looking at part time and full time mean hourly pay rates.

FRS Staff

9. There are pay gaps in favour of staff who do not declare a disability for both full time and part time mean hourly pay rates. For full time staff, there is a pay gap in favour of **staff who do not declare a disability** of **4.57%** and for part time staff, **12.44%**.

Control Staff

10. There are pay gaps in the Control staff group across full time mean hourly rates in favour of **disabled** staff of **9.74 %**.

Data transparency

11. The analysis of workforce, pay and promotions data, including detailed recruitment data, is important in understanding disability issues. Following governance changes in April 2018, data on diversity will be submitted to the London Fire Commissioner and this may be scrutinised by the Fire, Resilience and Emergency Planning Committee (FREP). London Assembly members have a continuing interest in the relative performance of GLA bodies on disability and pay, and have asked for this data to be published as part of the Mayor's annual report.
12. LFB publishes a quarterly corporate performance digest 'Our Performance' which includes reporting on disability in relation to recruitment, promotion and retention. A six-monthly People Services Performance Report is also published, highlighting detailed information and data on workforce demographics.

Tackling our pay gaps: context and actions

13. The key disability diversity issue for the LFB is to improve experience of disabled staff across the workforce as the number of disabled staff broadly represent the demographic data of London comprising 14.5% of the overall staff group against the London average of 15%. This has been clearly indicated by the people survey and will continue to be explored and addressed as part of our culture review and review of our strategy. A number of initiatives are being developed to improve this, along with representation and cultural change in other areas.

Transformation Delivery Plan

14. In January 2020, in response to the Phase 1 Grenfell Report recommendations and the HMICFRS inspection report, the new LFB Commissioner Andy Roe launched a Transformation Delivery Plan (TDP), setting out a new organisational vision, purpose, and three core behaviours.

15. The plan has two key enablers, one of which is diversity and inclusion, demonstrating a cultural shift and new direction to achieving diversity and inclusion across all areas of the organisation. The plan provides the structure and accountability for the new Togetherness Strategy (explained further below) and sets out key actions which will have a direct impact on the staff experience of our disabled staff.
16. This will be replaced by the new Target Operating Model, currently in development; EIAs are in place to support the development of this and active engagement with the Inclusion Team.

Talent and Performance

17. The Transformation Delivery Plan introduced three new core behaviours for LFB staff: compassion, togetherness and accountability. A new behavioural framework was launched cross-organisationally in 2020, and will underpin all operational and non-operational recruitment, promotion, development and performance management.
18. In addition, an Objectives and Performance Conversations is being rolled out. This has been launched for senior and middle managers and is being developed for other grades / ranks. For senior and middle managers, the rollout included a 360 degree feedback process based on the LFB Behaviours, which took place in 2020/21.

Leadership

19. The LFB Centre for Leadership was established in early 2019. In the past year, it has developed its role as an in-house delivery arm for leadership development. Their work has included the development and delivery of the LFB's new behavioural framework, a new Training for Trainers course, as well as a range of leadership development courses, focused predominantly around our three core behaviours of compassion, togetherness and accountability. Equality, Diversity and Inclusion are encompassed in all leadership course being delivered and those in development.
20. Supervisory leadership training (Gillian Tanner Programme) is currently being rolled out to approximately 620 participants, across all three staff groups. The Middle Leaders Leadership Programme is currently in development and will be delivered in early 2022 to around 620 middle leaders plus a number of opportunities for talent management.
21. Top manager Group / Director development is managed on a bespoke basis based on themes identified through the 360 process on a team and individual level. Throughout 2021 they have developed a new leadership pathway that is providing leadership development for all staff including supervisory, middle, and strategic leaders. Workshops are due to begin delivery in January 2022 on Strategic Resource days at venues around London.
22. In addition, the Togetherness Strategy commits to a number of actions relating to leadership and development, including training on inclusive leadership. The development of the Middle Leaders Leadership Programme will encompass bespoke workshops aim at supporting leadership development for underrepresented groups of staff, including staff with a disability.

Outreach

23. The Outreach Team was established in September 2017 and engages with under-represented groups (women, LGBT and those from ethnic minority backgrounds) to promote the role of a modern day firefighter.
24. In 2020, the Outreach Team delivered 15 Info (Virtual) sessions, this was a reduced number owing to the impacts of COVID-19. In 2021 to the present date, after the recruitment freeze lifted, there have been 21 Info (Virtual) sessions and a further four booked for December.
25. In addition to career information sessions, the team supports recruitment through attendance at targeted community-based activities such as career fairs, fitness events and cultural festivals across diverse boroughs of London in person where possible and making use of virtual opportunities where appropriate. Candidates are provided with support to meet the required standard for physical tests through one to one coaching or workshops. The team work closely with local career and employment partners to encourage them to promote the role to their service users, alongside work with schools and with education providers to raise awareness with future workforces.

Coaching and mentoring

26. In 2019 we launched a structured Coaching and Mentoring programme across the Brigade. This has created a network of staff, from all staff groups who assist with providing support to staff from all grades. This programme was temporarily delayed and has recently been re-launched. Two streams of the Coaching and Mentoring programme are now available: external coaches from the GLA Coaching Framework for middle managers and above and internal coaching across the organisation. The purpose of the Coaching and Mentoring programme is to improve diversity; career progression coaching; performance coaching and supporting the Leadership interventions. Discussions are in place for collaborative coaching across the GLA, BTP and some FRS's.
27. Reverse mentoring has been shown to be specifically effective in improving the diversity of the organisation and will be an additional offering from the Coaching and Mentoring Network, however, this offering has been delayed until further resources are available to support the stream of development.

Conclusion

28. There are significant actions being undertaken to tackle the varying disability pay gaps across the Brigade and to improve staff experience, which is arguably as important. The Togetherness Strategy and accompanying governance processes are embedded now, and LFB expects to continue to close the pay gaps where they arise through the goals and objectives outlined in this strategy.

ORIGINATING OFFICER DECLARATION:

Drafting officer to confirm the following (✓)

Drafting officer

Tiffany Oarton has drafted this report and confirms the following:

Assistant Director/Head of Service

Kate Bonham has reviewed the documentation and is satisfied for it to be referred to Board for consideration.

Advice

The Finance and Legal teams have commented on this proposal;

Tom Davies Legal Advisor, on behalf of General Counsel (Head of Law and Monitoring Officer)

Omolayo Sokoya, Financial Advisor, on behalf of the Chief Finance Officer