

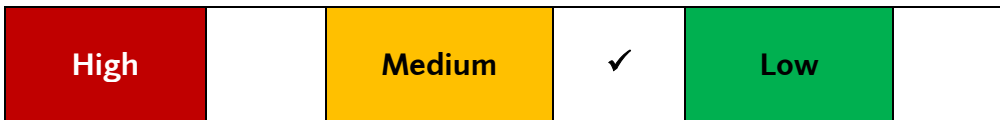
Equality Impact Assessment (EIA) Form

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?
PN770 – Brigade Car Schemes and Mileage Rates

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	Dominic Johnson
Department and Team	HR Advice & Employee Relations, People Services
Date of EIA	21/06/2021

3. Aim and Purpose	
What is the aim and purpose of the policy, project, decision or activity?	To set out the principal terms and conditions of the three Brigade car schemes (lease, essential, casual); the specifications for cars on the schemes; and what is claimable mileage with the agreed rates. N.B. This policy does not establish eligibility for the car schemes; these are pre-existing contractual matters, and the policy is a record of this.
Who is affected by this work (all staff, specific department, wider communities?)	<ul style="list-style-type: none"> All Station Commanders and above amongst the operational workforce – they are all eligible to be either lease or essential car users. (There are a very small number of other staff on the lease/essential car schemes). These two schemes are the most 'beneficial': lease car users receive a Brigade subsidy, and essential users receive a monthly allowance. Those operational (StnO and below) and FRS staff who are eligible to be on the casual car scheme. Casual car users receive no benefit other than payment of mileage.

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?	The trade unions, in particular within the Joint Committee for Middle Managers (FBU Officers; FOA), have been consulted on all amendments to PN770.

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?
Age (younger, older or particular age group)	Neutral (positive for older age group, and hence not positive for the younger age group – all schemes).	<p>Essential/Lease schemes: Amongst those eligible for these schemes (SCs+), there is a higher percentage in the age 40-54 bracket (84%) than amongst the operational workforce as a whole (53%). Correspondingly, amongst those eligible for these schemes (SCs+), there is a much lower percentage in the under age 40 bracket (9%) than amongst the operational workforce as a whole (43%).</p> <p>Casual scheme: Amongst those who are members of this scheme, the operational group (31 staff) also has an older age profile than the operational workforce as a whole (e.g. 51% over age 50, compared to 19% amongst whole operational workforce).</p> <p>Amongst those who are members of this scheme, the FRS group (56 staff) has a slightly older age profile than the FRS workforce as a whole (52% over age 50, compared to 44% amongst whole FRS workforce).</p>	LFB staffing data
Disability (physical, sensory, mental health, learning disability, long term illness, hidden)	Positive (see under Casual scheme)	<p>Essential/Lease schemes: Amongst those eligible for these schemes (SCs+) there is a higher percentage who are disabled (10.8%) than amongst the operational workforce as a whole (6.4%).</p> <p>Casual scheme: Amongst those who are members of this scheme, the operational group (31 staff) has 16%</p>	LFB staffing data

		<p>disabled; this is higher than amongst the whole operational workforce (6.4%). The FRS group (56 staff) has 11% disabled; this is slightly lower than amongst the whole FRS workforce where the percentage of disabled staff is 13.1%.</p> <p>However one criterion for access to the Casual Car Scheme is "A short or long term reasonable adjustment for medical reasons under the Equality Act", i.e. staff with a disability may be able to access this scheme even if, strictly speaking, their work duties on their own do not warrant this.</p>	
<p>Gender reassignment (someone proposing to/undergoing/ undergone a transition from one gender to another)</p>	Unknown/ Neutral	The policy has not been analysed in respect of this protected characteristic. (N.b. there are no provisions within PN770 which impact directly on this protected characteristic.)	N/A
<p>Marriage / Civil Partnership (married as well as same-sex couples)</p>	Unknown/ Neutral	The policy has not been analysed in respect of this protected characteristic. (N.b. there are no provisions within PN770 which impact directly on this protected characteristic.)	N/A
<p>Pregnancy and Maternity</p>	Unknown/ Neutral	The policy has not been analysed in respect of this protected characteristic. (N.b. there are no provisions within PN770 which impact directly on this protected characteristic.)	N/A
<p>Race (including nationality, colour, national and/or ethnic origins)</p>	Potentially adverse, if access to car schemes (lease and essential) is seen as a benefit. See s8 below.	<p>Essential/Lease schemes: Amongst those eligible for these schemes (SCs+) there is a lower percentage who are BAME (8.75%) than amongst the operational workforce as a whole (14.3%), as the schemes are offered to more senior positions.</p> <p>Casual scheme: Amongst those who are members of this scheme, the operational group (31 staff) has 6.5% BAME; this is lower than amongst the whole operational workforce (14.3%).</p>	LFB staffing data

		The FRS group (56 staff) has 17.9% BAME; this is lower than amongst the whole FRS workforce where the percentage of BAME staff is 28.9%.	
Religion or Belief (people of any religion, or no religion, or people who follow a particular belief (not political))	Unknown/ Neutral	The policy has not been analysed in respect of this protected characteristic. (N.b. there are no provisions within PN770 which impact directly on this protected characteristic.)	N/A
Sex (men and women)	Broadly neutral overall	<p>Essential/Lease schemes: Amongst those eligible for these schemes (SCs+) there is a slightly lower percentage who are women (7.5%) than amongst the operational workforce as a whole (8.9%) as the schemes are offered to more senior positions.</p> <p>Casual scheme: Amongst those who are members of this scheme, the operational group (31 staff) has 22.6% women; this is higher than amongst the whole operational workforce (8.9%).</p> <p>The FRS group (56 staff) has 42.9% women; this is lower than amongst the whole FRS workforce where the percentage of women staff is 51.9%.</p>	LFB staffing data
Sexual Orientation (straight, bi, gay and lesbian people)	Broadly neutral overall	<p>Essential/Lease schemes: Amongst those eligible for these schemes (SCs+) there is a similar percentage who are LGB (5%) compared to the operational workforce as a whole (5.5%).</p> <p>Casual scheme: Amongst those who are members of this scheme, the operational group (31 staff) has 6.5% LGB; this is higher than amongst the whole operational workforce (5.5%).</p> <p>The FRS group (56 staff) has 3.6% LGB; this is lower than amongst the whole FRS workforce where the percentage of LGB staff is 5.5%.</p>	

6. Impacts outside the Equality Act 2010
What other groups might be affected by this policy, project, decision or activity?
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.
Access to the Brigade car schemes may, for example be of benefit to staff who are carers/parents for off-duty activities, however that cannot be a criteria, on its own, to access the schemes. Access to the schemes is determined by role/work duties, plus as a reasonable adjustment on medical grounds as noted above.

7. Legal duties under the Public Sector Equality Duty (s149 Equality Act 2010)	
How does this work help LFB to:	
Eliminate discrimination?	<p>PN770 sets out the contractual terms of the Brigade's car schemes. Access to a car is essential for operational managers in the rank of Station Commander and above for them to fulfil their operational duties and hence for the Brigade to deliver fire cover. All operational staff at Station Commander rank and above are treated equally in this regard (they have access to either the lease car or essential car schemes), hence without discrimination.</p> <p>Access to the Brigade's casual car scheme is more discretionary, but in line with objective criteria set out at para. 5.1 and 5.2 of the policy. The criteria apply primarily to posts rather than individuals, and hence once a given post is deemed as eligible for the casual car scheme (e.g. Fire Safety Inspecting Officers), all staff in that post have access to the casual car scheme without discrimination.</p> <p>However in addition staff may also be able to access the casual car scheme as "A short or long term reasonable adjustment for medical reasons under the Equality Act", which may assist in eliminating discrimination on grounds of disability.</p>
Advance equality of opportunity between different groups?	See above. The criteria for access to the Brigade's different car schemes apply to posts and not individuals, and therefore there is equal treatment for all staff in the designated posts. The most significant group of staff are operational staff in the rank of Station Commander and above who all have access to the lease and essential car schemes.
Foster good relations between different groups?	See above. All significant car scheme issues are consulted on with the recognised trade unions, in particular within the Joint Committee for Middle Managers in respect of the lease and essential car schemes. There is a common understanding of the different needs of the different staff groups, and hence the rationale for the different Brigade car schemes.

8. Mitigating and justifying impacts		
Where an adverse impact has been identified, what steps are being taken to mitigate it? If you're unable to mitigate it, is it justified ?		
Characteristic with potential adverse impact (e.g. age, disability)	Action being taken to mitigate or justify	Lead person responsible for action
Race	<p>The justification for any potential adverse impact is that access to the Brigade car schemes is determined (primarily) by work role and/or work duties. Adverse impact cannot be mitigated by allowing access to the car schemes for those whose role or work duties does not justify this, other than as a reasonable adjustment on medical grounds for the casual scheme as set out in PN770, para. 5.2. So access to the essential and lease car schemes (the most 'beneficial' schemes, as they attract a Brigade subsidy/allowance) is generally limited to operational managers in the roles of SC and above. There are a restricted number of additional staff with access to these schemes by virtue of their work duties, e.g. the SCCs/DAC in Control. The casual car scheme does not attract any Brigade allowance, purely reimbursement of mileage, and eligibility is also linked to work duties as set out in PN770, plus the reasonable adjustment criterion.</p> <p>In terms of mitigation, insofar as access to the Brigade car schemes, in particular to the lease and essential car schemes, is considered a benefit, there is a lower BAME representation in this cohort than amongst the wider workforce. Primarily, this is a straightforward reflection of the lower representation of BAME staff in the ranks of Station Commander and above compared to the whole operational workforce. This is a wider Brigade issue and steps are being taken to address this, in particular the action plan for the Brigade's ethnicity pay gap, and actions within the Togetherness Strategy.</p>	SME Industrial & Employee Relations in liaison with those leading on the ethnicity pay gap action plan and the Togetherness Strategy.

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.