

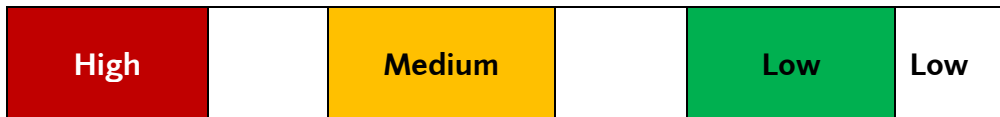
## Equality Impact Assessment (EIA) Form

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> |
| PN924 Overtime and compensatory leave – FRS staff                        |

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



|                           |                                  |
|---------------------------|----------------------------------|
| <b>2. Contact details</b> |                                  |
| Name of EIA author        | Patrick Gallagher                |
| Department and Team       | HR Advice and Employee Relations |
| Date of EIA               | 13/08/2021                       |

|   |  |
|---|--|
| <b>3. Aim and Purpose</b>   |  |
| What is the aim and purpose of the policy, project, decision or activity?         | This policy provides information on the entitlement to overtime for FRS employees, which is claimed as a payment or as time off in lieu of hours worked (CL). It provides information on the enhanced rates payable and details how claims for overtime and CL are requested, authorised and recorded. This policy also details arrangements relating to employees who put themselves forward to support activities for the Brigade outside of their contractual working hours, or where activities are unrelated to their role/job description. |
| Who is affected by this work (all staff, specific department, wider communities?) | FRS staff  |



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**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?

None at this stage, this is an ongoing policy with minor modifications. Any change of significance would go through the IR consultation route and this review has only drafted minor alterations.

## 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><br>(younger, older or particular age group)   | Neutral                              | These arrangements affect the whole of the LFB's FRS staff. Overtime hours appear to be evenly distributed across all age ranges.<br><br>The implications of it are unlikely to adversely impact one specific age group within the age ranges. | Review of overtime distribution over the last four financial years in the LFB.   |
| <b>Disability</b><br>(physical, sensory, mental health, learning disability, long term illness, hidden)            | Neutral                              | Staff registered with a disability comprise 12.83% of the LFB FRS workforce, with 13.65% of overtime hours worked by them.   | Review of overtime distribution over the last four financial years in the LFB.   |
| <b>Gender reassignment</b><br>(someone proposing to/undergoing/ undergone a transition from one gender to another) | Neutral                              | Gendered language is avoided in the policy document.   | None   |
| <b>Marriage / Civil Partnership</b><br>(married as well as same-sex couples)                                       | Neutral                              | It is not anticipated to affect this area in any substantial way.  | None   |

|   |                |  |   |
|---|----------------|--|---|
| <p><b>Pregnancy and Maternity</b></p>   | <p>Neutral</p> | <p>It is not anticipated to affect this area in any substantial or disproportionate way. (Although see sex below)</p>  | <p>None</p>   |
| <p><b>Race</b> (including nationality, colour, national and/or ethnic origins)</p>  | <p>Neutral</p> | <p>Managers are discouraged from reliance on overtime and it should be a tool of last resort. The distribution/uptake of overtime across the FRS staff group doesn't equally reflect the LFB's ethnicity workforce.</p> <p>The departments where the majority of staff overtime is worked have a lower representation of BAME staff that the wider LFB support staff demographics.</p> <p>The Black and Minority Ethnic category 16.47% of overtime hours were worked by this group against their representation being 29.09% of FRS staff.</p> <p>Departmentally Technical &amp; Commercial have 25% of their staff registered in these categories, Fire Safety 24.92%, Fire Stations 40%, ICT 25.96%, whereas London Resilience is 4.35%. These departments account for 88% of overtime hours over the four year period sampled.</p> <p>While overtime is voluntary, access and opportunity to it should be equitable, with the caveats that overtime should be used sparingly and where necessary. It's too granular a task to determine if access to overtime is equitable on ethnicity grounds, but there is a reminder of the need to share the opportunity and I'd suggest this metric should be monitored in future.</p> | <p>Review of overtime distribution over the last four financial years in the LFB.</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>Neutral</p> | <p>It is not anticipated that this policy will affect any group religious or belief-based group in any substantial or disproportionate way.</p>  | <p>.</p>  |

|   |                |   |  |
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| <p><b>Sex</b><br/>(men and women)</p>                                   | <p>Neutral</p> | <p><i>Consider: how might men and women be affected differently by your policy, project or proposal? Are there more men or more women who will be affected?</i></p> <p>51.66% of the Brigade's current FRS workforce are female, 49.87% of overtime hours are worked by female members of staff. This isn't a significant difference in itself. It does raise the question of overtime hours worked. There is the gender pay gap and overtime provides an opportunity to earn more money than the standard salary for many staff, and is only available to lower paid staff at FRS Grades B-E, conversely it's widely accepted that a greater deal of domestic caring and work is undertaken by women, normally making the extension of a working day more challenging, but not in this case it would appear. The LFB's total full-time contractual hours of 35, is the average in the UK as of May 2021 (according to Google search). Therefore the wider terms &amp; conditions are accommodating of women also working overtime in the LFB.</p> <p>Again for context overtime is viewed as a necessity rather than a staple or right.</p> <p>The policy refers to the opportunities being equally distributed and wouldn't at this stage require additional scrutiny beyond these figures.</p> | <p><i>Review of overtime distribution over the last four financial years in the LFB. And web search.</i></p> |
| <p><b>Sexual Orientation</b> (straight, bi, gay and lesbian people)</p> | <p>Neutral</p> | <p>Figures show that LGBT+ staff undertake a smaller percentage of overtime hours than their representation in the workforce. 5.45% self-declared in this category, with</p>  | <p>Review of overtime distribution over the last four financial years in the LFB.</p>                        |

|  |  |  |  |
|--|--|--|--|
|  |  | 4.74% of overtime hours worked by staff in this category.<br>The policy is not anticipated as having a detrimental effect on this group. |  |
|--|--|--|--|

**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.

*Consider: how accessible is your policy/project/proposal for people with learning disabilities or neurodiverse conditions? Have you checked the colours, or used flowchart and diagrams?*

None highlighted although have asked the Disability Working Group for any suggestions.

**7. Legal duties under the Public Sector Equality Duty (s149 Equality Act 2010)**

How does this work help LFB to:

|  |  |
|--|--|
| <b>Eliminate discrimination?</b>                                 | The policy makes clear the need to balance the circumstances of the individual need to be taken in to account in offering overtime.  |
| <b>Advance equality of opportunity between different groups?</b> | Managers are explicitly directed to endeavour to ensure that the opportunity to perform such overtime is distributed equally amongst the available pool of staff as appropriate. |
| <b>Foster good relations between different groups?</b>           | By virtue of clarifying the process and allowing access on an equitable basis, transparency supports good relations between all staff as well as being good practice.            |

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| <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> |
| None identified   |  |   |
|   |  |   |
|   |  |   |
|   |  |   |

**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.

**Document Control**

|                                     |  |   |                             |
|-------------------------------------|--|---|-----------------------------|
| Signed (lead for EIA / action plan) | Patrick Gallagher                                      | Date                                    | 16/08/2021                  |
| Sign off by Inclusion Team          | Shilla Patel   | Date                                    | 16/08/2021                  |
| Stored by                           |  |   |                             |
| Links                               |  |   |                             |
| External publication                | Are you happy for this EIA to be published externally? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |



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|--|--|--|------------------|
|  |  |  | If No state why: |
|--|--|--|------------------|