

### **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.

# What is the name of the policy, project, decision or activity? Fire Safety Delivery Transformation Plan

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

High	Medium	Low
------	--------	-----

2. Contact details	
Name of EIA author	SC Paul Osborne
Department and Team	Regulatory Fire Safety - Delivery
Date of EIA	08/06/21

3. Aim and Purpose	
What is the aim and purpose of the policy, project, decision or activity?	The restructure of Regulatory Fire Safety Delivery to deliver improved levels of effectiveness and efficiency, to better support our people and develop more inclusive teams.  Key points are:  Improve consistency in all areas including but not limited to audit, training and development and create capacity for change.  Increase team size to improve peer group support, peer learning and spread experience (reducing the risk of 'isolation' or lack of support).  Restructure teams to free up managerial/leadership capacity to improve support for staff, increase accountability and create capacity for an Active Risk Targeting and High-Risk Premises Team.



•	To enable more flexible working and to incorporate learning
	from working during the pandemic.

This project is linked to the Estate Plan (Fire Safety Service Improvement) and the Risk Based Inspection Program review (Delivery). With the project plan drafted, the Equality Impact Assessment is underway. Further engagement with staff is then planned.

Who is affected by this work (all staff, specific department, wider communities?)

#### RFS Delivery staff.

This restructure predominantly affects staff based in RFS Delivery. However, staff from across the department and brigade may need to be made aware the transformation plan and how it may impact upon them and their teams.

#### Our communities

As this is Fire Safety's Service Delivery, our communities may be indirectly affected.

#### **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?

A working draft of the plan has been agreed by the Fire Safety Management Board, Transformation proposals have been presented by DAC Pugsley. He has presented the draft to representative bodies and to all staff in Delivery, inviting feedback prior to the EIA and formalised project plan being put forward for further consultation. All staff Q&A sessions have been held online and Delivery managers have also been extensively consulted. This pre-project commencement work has resulted in some changes to the draft e.g.

- The inclusion of the Admin team is not out of scope.
- Staff views on travel and location of hubs (which is part of the separate Estate plan project).
- Accessibility to stations (consideration of physical disabilities).
- Improved flexible working to suit those with care responsibilities.

SC Osborne has been appointed as Project Manager (PM) as a full-time role, due to the impact on the service we provide and our staff. During May 2021, SC Osborne visited different teams and locations within RFS Delivery to to discuss the proposal. Information was gathered regarding concerns and observations which has allowed the DAC to respond and address points to improve the proposal.

Further information was requested from the HR data team about the workforce and if they have any protected



LONDON FIRE BRIGADE		
	characteristics that can be further considered as part of this proposal that RFS Delivery are not currently aware of.	
	The Inclusion team have been initially consulted to inform them of the proposal to support the population of this EIA.	
	Once the EIA and revised project plan is completed, both will be presented to staff and representative bodies, including the Equality Support Groups (ESGs) before the project gets underway.	



## 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	This proposal will affect current staff serving within RFS Delivery.  Equalities data including age of staff was gathered during the production of the EIA. The age of staff in RFS Delivery range from under 20 to +65. The age bracket between 50 and 59 has the highest % of staff at 37.41%. Other age ranges per 10 years have similar values between 12.24% and 17.69%, except for under 20's accounting for just 0.68%.  Therefore, there is not one specific age that this plan will affect which needs greater consideration.  Learning from COVID regarding more agile working methods for staff (whilst ensuring accountability) is being explored.  By changing the management structure, an Area Fire Safety Manager will be specifically responsible for	Staff: Information regarding staff ages was provided by the HR People Management Information Team (pshrpmi@london-fire.gov.uk) following a department request. All staff Q&A and engagement sessions have been held.  Community/Public: This proposal relates to the staff within RFS Delivery and where they work. It is not expected to have an age-related consideration for the community/public.  NB: Self-help tools, guidance in new legislation and building safety regulator packages mentioned in section 3 are expected to be subject to their own individual EIA and therefore not covered by this assessment.



		developing improved support for staff development and more inclusive teams (along with other duties).	
Disability (physical, sensory, mental health, learning disability, long term illness, hidden)	Neutral (noting that the estate plan is a separate project)	12.50% of RFS Delivery have a declared disability. Managers for staff and staff have been encouraged to discuss new working practices and how this may affect them so that reasonable adjustments can be made before the plans inception to mitigate any impact.  All communications and documentation regarding the Transformational Plan are in clear format and communicated orally and in writing.  Communications and documentation will be proofread by a third party to see if any adjustments, formatting needs to be addressed. Advice and support regarding communication will be requested from the Learning Support Team as necessary.  All electronic communications and documentation will be provided in a format that provides the reader the opportunity to 'zoom' in and out. They will also be able to change the colour and contrast of the document to support their own learning style.  The impact has been considered for staff with neurodiverse conditions. Despite teams being amalgamated to two central areas twice a week the office working environment will support smaller break away areas for staff to work. Team members with any protected characteristics will be supported by their manager so that the change of working location does not impact their wellbeing.	Staff: Information regarding staff disability was provided by the HR People Management Information Team (pshrpmi@london-fire.gov.uk) following a department request.  Community/Public: This proposal relates to the staff within RFS Delivery and where they work. It is not expected to have a disability related consideration for the community/public.  NB: Self-help tools, guidance in new legislation and building safety regulator packages mentioned in section 3 are expected to be subject to their own individual EIA and not covered by this assessment.



		The change of estate location for the hub and spokes is part of a separate project (Fire Safety estate plan initiative being addressed by SC Richard Wyatt and Laura Birnbaum in LFB Property). The estate's project is responsible for identifying appropriate working locations and their accessibility. The estate plan for the transformational project will be reviewed once locations have been identified.  The proposed restructure delivery model to two areas and change in management structure should help develop a more inclusive working environment. It will enhance support (including mental health and wellbeing) to all members of staff, encouraging consistency across the department, develop a 'just culture' (lessons learned are shared and acted upon, without blame) whilst improving support networks due to reducing silo working and isolation.  By changing the management structure, an Area Fire Safety Manager will be specifically responsible for developing improved support for staff development and more inclusive teams (along with other duties).  Learning from COVID regarding more agile working methods for staff (whilst ensuring accountability) is being explored and may particularly benefit those with physical disabilities, neurodiversity or / and mental health conditions.	
Gender reassignment (someone proposing to/undergoing/ undergone a transition from one gender to another)	Neutral	This is a gender-neutral project, gender neutral language is used in all communications and documentation.  The change of estate location for the hub and spokes is being addressed by SC Richard Wyatt and Laura	<b>Staff:</b> No specific information is available regarding staff in this category. However, this project is based on normal working practices.



		Birnbaum in property. They are responsible for identifying changes to working location, (part of a larger Fire Safety estates review) identifying locations and their accessibility including facilities for all staff groups including gender neutral toilets.  By changing the management structure, an Area Fire Safety Manager will be specifically responsible for developing improved support for staff development and more inclusive teams (along with other duties).  Larger teams with improved staff support (with a focus on our Togetherness Strategy) should reduce the risk staff with protected characteristics from feeling isolated and/or unsupported.	Community/Public: This project is based on normal working practices.
Marriage / Civil Partnership (married as well as same-sex	Neutral	This project should not impact this protected	<b>Staff:</b> If staff with this protected characteristic are
couples)		characteristic. By changing the management structure, an Area Fire Safety Manager will be specifically responsible for developing improved support for staff development and more inclusive teams (along with other duties).	impacted, then this will be factored in when regularly reviewing this EIA as the project progresses.
		Larger teams with improved staff support (with a focus on our Togetherness Strategy) should reduce the risk staff with protected characteristics from feeling isolated and/or unsupported.	
Pregnancy and Maternity		This project should not impact this protected characteristic.	<b>Staff:</b> If staff with this protected characteristic are impacted, then this will be factored in when
	Neutral	By changing the management structure, an Area Fire Safety Manager will be specifically responsible for	regularly reviewing this EIA as the project progresses.
		developing improved support for staff development and more inclusive teams (along with other duties).	The change of estate location for the hub and spokes is part of a separate project (Fire Safety estate plan initiative being addressed by SC



		Larger teams with improved staff support (with a focus on our Togetherness Strategy) should reduce the risk staff with protected characteristics from feeling isolated and/or unsupported.	Richard Wyatt and Laura Birnbaum in LFB Property). The estate's project is responsible for identifying appropriate working locations and their accessibility including support for expectant members of staff. The estate plan for the transformational project will be reviewed once locations have been identified.
Race (including nationality, colour, national and/or ethnic origins)	Neutral	This project should not impact this protected characteristic.  By changing the management structure, an Area Fire Safety Manager will be specifically responsible for developing improved support for staff development and more inclusive teams (along with other duties).  Larger teams with improved staff support (with a focus on our Togetherness Strategy) should reduce the risk staff with protected characteristics from feeling isolated and/or unsupported.	Staff: If staff with this protected characteristic are impacted, then this will be factored in when regularly reviewing this EIA as the project progresses.  Information regarding race was provided by the HR People Management Information Team (pshrpmi@london-fire.gov.uk) following a department request. This identified that 22.92% were BAME and 72.92% were white.
Religion or Belief (people of any religion, or no religion, or people who follow a particular belief (not political)	Neutral	This project should not impact this protected characteristic.  By changing the management structure, an Area Fire Safety Manager will be specifically responsible for developing improved support for staff development and more inclusive teams (along with other duties).  Larger teams with improved staff support (with a focus on our Togetherness Strategy) should reduce the risk staff with protected characteristics from feeling isolated and/or unsupported.	Staff: If staff with this protected characteristic are impacted, then this will be factored in when regularly reviewing this EIA as the project progresses.  The change of estate location for the hub and spokes is part of a separate project (Fire Safety estate plan initiative being addressed by SC Richard Wyatt and Laura Birnbaum in LFB Property). The estate's project is responsible for identifying appropriate working locations and their accessibility including consideration of people's beliefs for example access to a prayer room. The



			estate plan for the transformational project will be reviewed once locations have been identified.
Sex (men and women)	Neutral	This is a gender-neutral project and gender-neutral language will used in all communications and documentation, where required.  If any legal documentation is used or quoted then the legal gender definition will be used, if required.  By changing the management structure, an Area Fire Safety Manager will be specifically responsible for developing improved support for staff development and more inclusive teams (along with other duties).  Larger teams with improved staff support (with a focus on our Togetherness Strategy) should reduce the risk staff with protected characteristics from feeling isolated and/or unsupported.	This is based on normal working practices.  Information regarding gender was provided by the HR People Management Information Team (pshrpmi@london-fire.gov.uk) following a department request. This identified that 27.08% were female and 72.92% were male.
Sexual Orientation (straight, bi, gay and lesbian people)	Neutral	If any legal documentation is used or quoted then the legal gender definition will be used, if required. By changing the management structure, an Area Fire Safety Manager will be specifically responsible for developing improved support for staff development and more inclusive teams (along with other duties).  Larger teams with improved staff support (with a focus on our Togetherness Strategy) should reduce the risk staff with protected characteristics from feeling isolated and/or unsupported.	This is based on normal working practices.  Information regarding sexual orientation was provided by the HR People Management Information Team (pshrpmi@london-fire.gov.uk) following a department request. This identified that 6.80% were LGBTQ+.

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, exoffenders, people living in areas of disadvantage, homeless people, people on low income / in poverty.

This project should have a positive impact for RFS Delivery staff. It aims to provide a more efficient and effective management structure with team structures able to support learning and development whilst supporting more agile working learnt from the COVID pandemic.

7. Legal duties under the Public Sector Equality Duty (s149 Equality Act 2010)		
How does this work help LFB to:		
Eliminate discrimination?	Ensuring all staff understand the progress and results of this project will ensure all staff have similar opportunities to understand and use the findings so to eliminate discrimination.  Embedding our Togetherness Strategy as part of the transformation and ongoing work should reduce inequality, as will additional work such as bespoke training for managers as already provided by the Cultural Change team.	
Advance equality of opportunity between different groups?	As the communications and documentation will be a standardised accessible to all format, all groups will have the same information provided in the same way so there will be no barriers to equality of opportunity. In addition, the RFS Delivery DAC has already begun a regular all staff engagement program aimed at updating the team via video conferencing or in person allowing all the opportunity to ask questions regarding the transformational plan and department restructure.	
Foster good relations between different groups?	As all groups will be able to understand and implement the findings and be provided with the same information there will be no barriers between groups. In addition as by changing the management structure, an Area Fire Safety Manager will be specifically responsible for developing improved support for staff development and more inclusive teams (along with other duties).  Larger teams with improved staff support (with a focus on our Togetherness Strategy) should reduce the risk staff with protected characteristics from feeling isolated and/or unsupported and foster good relations, which will indirectly impact our diverse communities.	



Date

Date

No □

If No state why:

13 July 2021

Where an adverse impact has been identified, w	hat steps are being taken to mitigate it? If you're un	able to mitigate it, is it <b>justified</b> ?
Characteristic with potential adverse impact (e.g. age, disability)	Action being taken to mitigate or justify	Lead person responsible for action
Now complete the DAC rating at t	ho top of page 1.	
Now complete the RAG rating at t	the top of page 1:	
	the top of page 1:	urther work is done to mitigate the impact.
<b>ligh:</b> as a result of this EIA there is evidence of signific		

Yes □

Signed (lead for EIA / action plan)

Shilla Patel

Are you happy for this EIA to be published externally?

Sign off by Inclusion Team

External publication

Stored by Links