

Proposal for the decommissioning of Electronic Personal Development Records (ePDRs)

Report to:

People Board.
Investment & Finance Board.
Commissioner's Board.
Deputy Mayor's Fire and Resilience Board.
London Fire Commissioner

Date:

13th September 2022
27th September 2022
5th October 2022
13th October 2022

Report by:

Nicholas Davis Deputy Assistant Commissioner Learning and Professional Development

Report classification:

For decision

For publication

I agree the recommended decision below.



Andy Roe
London Fire Commissioner

Date **This decision was remotely
signed on 27 April 2023**

PART ONE

Non-confidential facts and advice to the decision-maker

Executive Summary

To align with national standards, LFB's Learning and Professional Development department has worked hard to develop a new suite of accredited acquisition courses for operational staff to support their development, and where appropriate, their promotion aspirations. These give assurance to the organisation that staff are competent, safe, and trained to the same standards. Furthermore, the Organisational Learning Model, which is due to be launched in January 2023, will ensure that all staff can complete a range of standardised development activities to ensure competence in role. Historic development models within LFB have relied heavily on Electronic Personal Development Record folders (ePDRs) to provide evidence of staff development within role once promoted. This has highlighted a range of development issues, due to inconsistent practices and poor standardisation. These legacy ePDRs are not aligned to the centrally led nationally accredited acquisition courses. The continued use of ePDRs is a risk to the organisation that cannot be indefinitely justified, and this paper seeks agreement from the London Fire Commissioner to have them decommissioned.

Recommended decisions

- It is recommended that the London Fire Commissioner (LFC) accepts the evidence in this report and agrees to the decommissioning of ePDRs for Leading Firefighters, Sub-Officers, and Station Officers.
- It is recommended that the LFC accepts the evidence in this report and agrees to the decommissioning of ePDRs for Firefighters on Development (FFDs).
- It is recommended that the LFC accepts the evidence in this report and agrees to the decommissioning of PDRs for Station Commanders and Group Commanders.
- It is recommended that the LFC accepts the evidence in this report and agrees to setting a standard 25-month period during which FFD staff are paid the development rate of pay, before then automatically receiving competent pay.

For the London Fire Commissioner

The London Fire Commissioner (LFC) agrees to additional spend of £174k in 2022/23, £468k in 2023/24, £179k in 2024/25, £172k in 2025/26, £172k in 2026/27, and £173k from 2027/28 onwards, in line with section seven of this report, and that this amount be allocated from reserves for the purpose of removing Electronic Personal Development Records. This will remove the concept of development pay for the ranks of Station Commander and Group Commander. The costs are as outlined in Appendix 1. Further, that the LFC agrees to setting a standard 25-month period during which FFD staff are paid the development rate of pay, before then automatically receiving competent pay.

1 Introduction and background

- 1.1 Further to the recent HMI inspection report and Grenfell Outcome Phase 1 report LFB's Learning and Professional Development Department has developed a suite of accredited incident command acquisition courses that align to national standards at Levels 1 and 2. These are supported by the Organisational Learning Model which allows staff to develop before promotion and acquisition.
- 1.2 ePDRs are a legacy learning and development tool previously used before the introduction of current nationally aligned acquisition courses and a number of these are still live. Whilst historically these have been the mainstay of the Brigade's development programmes, they now predate the Learning and Professional Development Department's current vision for development of operational staff and their continued use comes with risk. By being used concurrently with now nationally aligned acquisition courses they increasingly confuse staff and can impact negatively on the development journey. Furthermore, staff increasingly find it difficult to reconcile the demands of an ePDR to produce further evidence of their learning when the acquisition course they completed to a national standard assured them of their competence. Although amendments to the ePDR were made in 2019 to support the introduction of Role to Rank, the last substantive review of ePDR took place in 2012. ePDR is no longer fit for purpose. Also use of ePDRs relies all but exclusively on staff who themselves have had limited or no training on how to complete training processes to an agreed standard. ePDRs offer little assurance to the organisation of standardised learning. These risks are observed to varying degrees in all operational staff groups.
- 1.3 The organisation's learning and professional development model has changed significantly with the introduction of, for example, nationally aligned recognised qualifications (Skills for Justice), acquisition incident command levels 1 & 2 training, Development and Maintenance of Operational Professionalism (DaMOP), revalidation of skills and licence to operate (launched planned by the end of Q3) initiatives.
- 1.4 Notwithstanding the fact that ePDR is not fit for purpose, and that it is recommended that it be switched off, it is also worth noting that work is underway to, in effect, replace ePDR with a more robust and fit-for-purpose tool. There currently are no cost saving associated with the removal of ePDRs for the ranks of Leading Firefighter to Group Commander as we currently still use the same system for FF Developments and some specialist roles.
- 1.5 As outlined in the Organisational Learning and Professional Development Strategy 2022-2024, the implementation of the Organisational Learning Model (OLM) will see the introduction of an appraisal for all staff that includes an ongoing assessment against a role-specific Learning Specification. The plan is for Learning Specifications to be issued to all staff before the end of March 2023, and for appraisals against those Learning Specifications to begin in April 2023. As ePDRs were removed for the ranks of LFF to GC on the 26 January 2023, this meant that there will still be a competency framework in place within a short period of time (via the Learning Specifications). The request for competent pay for all SC's and GC's following the removal of ePDRs is to bring them in line with the other ranks below who already receive competent rates of pay following promotion, and the intention is for this to be backdated to the 1 January 2023.
- 1.6 Learning Specifications are to be issued to all operational staff before the beginning of April 2023 and for the wider staff by the end of June 2023, and for appraisals against those Learning Specifications to begin in April 2023.
- 1.7 Longer-term, the strategy will deliver an annual organisation-wide Learning Needs Analysis (gleaned from appraisals against Learning Specifications) underpinned by a robust training assurance and training evaluation framework.

1.8 When removing ePDR across staff groups, it is important to ensure any decision aligns itself with the Role to Rank agreement approved 19th June 2019. There is a need to be mindful that development (D) remains in place for a minimum of 9 months to prevent newly promoted officers, in particular Leading Firefighters, either acting up at their own station or being sent out on standby and automatically acting up to Sub Officer on day one of their promotion. Following completion of the 9-month period, a further 12-month period in role is to be maintained before being considered for promotion to the next rank.

1.9 The decommissioning of ePDRs does not have to have any impact on the role to rank agreement in so far as the 9 month and 12 month periods described above will remain in place independently of the removal of ePDRs.

2 Objectives and expected outcomes

2.1 In order to decommission ePDRs across staff groups, they have been broken down into three staff groups across two key areas.

The three Staff groups are as follows:

- Firefighter Development (FFD)
- Leading firefighter/Sub Officer/Station Officer
- Station Commander /Group Commander

2.2 There are no financial implications for the Leading Firefighter / Sub Officer / Station Officer group as they currently receive competent rate of pay when promoted. There is no development rate of pay across this staff group. Therefore, it is proposed that ePDRs for this group are removed immediately.

2.3 In line with the role to rank agreement, the (D) will still be in place for a period of 9 months from date of promotion and will be removed thereafter. This is to protect the role to rank agreement and prevent a newly promoted LFF either acting up at their own station or being sent out on standby as a temporary Sub Officer from day one in their new role.

2.4 Below explains how each staff group will be impacted upon removal of ePDRs until the new Organisational Learning Model is established in December 2022.

2.5 Analysis of the time spent by officers working on ePDRs, as compared to the time commitment that is anticipated once the new appraisal scheme is in place, point towards a significant productivity saving. It is estimated that each firefighter ePDR takes up to 200 hours of input time, for both the individual and their line manager, with a figure of 100 hours for station commanders and group commanders (and their line managers). By contrast, the new appraisal system is envisaged to require a time commitment of less than 20 hours per year for individuals, and approximately 12 hours per line manager per year. The time saved from removing ePDRs for the rank of LFF to GC will be utilised in carrying out the replacement appraisals, training and community safety activities. Therefore, there will not be a monetary cost saving, but one of productivity.

3. Financial

Firefighter Development FF(D)s

3.1 The FF Apprenticeship is aligned to the National Firefighter Role-maps (except for unit FF9 Driving). Currently, competent pay is accessed upon completion of the ePDR process, rather than at the

passing of the Apprenticeship End Point Assessment (EPA).

- 3.2 Work based evidence currently captured by the ePDRs is already being captured via evidence logs uploaded to the apprenticeship portfolio. Removing the ePDR will remove this double-recording of information.
- 3.3 Currently FFD ePDRs are completed on average at around 25 months. The end point assessment is typically completed after 18 months. Financial analysis has been conducted on the impact of bringing forward access to competent pay from ePDR completion (at 25 months) to EPA completion (at 18 months). The impact is an additional cost of circa £1.7m per year. In the current financial climate, this is not an affordable sum. This unavoidable financial reality has been tackled as this report has moved through LFB governance.
- 3.4 Accordingly, the recommendation is to pay FF(D) staff at the development rate of pay for a fixed period of time (25 months), after which they will automatically receive competent pay. This will allow the LFB to de-couple the FF(D) competent pay trigger from the ePDR, whilst also respecting the financial reality that prevents the LFB from being in a position to bring forward the point at which competent pay is accessed (i.e. by, on average, seven months).
- 3.5 This proposal also has the added benefit of enabling and encouraging performance management of FF(D) staff, with an upper time limit of 25 months.

Benefits:

- This allows for far more effective and efficient development.
- Candidates are not having to duplicate work and navigate two computer systems.
- Apprenticeship portfolio will be linked to Babcock's LMS system which provides a robust auditable system.
- Station based staff are familiar with LMS system.
- Process can be assured by Babcock.
- LMS can be linked to StARS so changes in assessor will automatically be updated (unlike the ePDR system which is done manually).
- Moderator role removed from process freeing up pressures on station-based staff.
- Assessor has more quality time to focus on developing the candidate.
- New apprenticeship process aligns with current National Operational Standards and captured within the 14 duties.
- New process can be standardised.
- Final EPA assessed by a neutral external verifier so the assessment will be more objective and fairer.

4 Station and Group Commanders

- 4.1 Due to the cost implications, financial approval from the City Hall will be required to remove ePDRs from Station and Group Commanders. Once this has been removed, Station and Group Commanders will be deemed as competent from day one of promotion, and paid accordingly. Currently, average ePDR completion time for Station Commanders is 16 months and for Group Commanders is 15 months. This paper is therefore proposing that the concept of development pay is removed for these ranks in line with the rest of the operational workforce aside from FFD.
- 4.2 To minimise operational risk to the organisation prior to implementation of the OLM, Officers can be assured through the acquisition level 2 Incident command courses, Operational Review

Team officers, monitoring officers, ICLs, Command Reviews/Hot debriefs/IMPs.

- 4.3 Generic professional skills will be captured in tier 2 conversations/appraisals, until the Organisational Learning Model is established.
- 4.4 There are no issues around the Role to Rank Agreement with regards to Station and Group Commander as they are not part of the agreement.

Benefits

- Staff remuneration will be dependent on responsibility, not development status. This would align Level 2 with Level 1.
- Fire Stations Department supports the recommendation for ePDRs for firefighters up to the rank of Station officer to be decommissioned. They have raised concerns previously about the time this process takes up, duplicating processes already in place. This will provide staff who fall within this group more time to concentrate their time on other activities, which include but are not limited to training, community engagement, fire safety inspections and personal wellbeing.

5 Assumptions & Costings

| Rank | Impact cost by FY £ | | | | | |
|---------------|---------------------|----------------|----------------|----------------|----------------|----------------|
| | 22/23 | 23/24 | 24/25 | 25/26 | 26/27 | 27/28 |
| SC | 114,186 | 327,513 | 127,759 | 127,759 | 127,759 | 128,021 |
| GC | 59,750 | 140,402 | 51,413 | 44,690 | 44,690 | 44,788 |
| Totals | 173,935 | 467,916 | 179,172 | 172,449 | 172,449 | 172,809 |

6 Non-Financial

- 6.1 Leading firefighters/Sub O/Station Officers
ePDRs can be removed with immediate effect; all officers will keep their (D) on StARS for a 9-month duration to comply with the R2R agreement and to protect staff from being acted up in their initial skills consolidation period. This will then automatically be removed on completion of 9 months within role. They will then have to complete 12 months in role before access to the next promotion round. These measures will ensure alignment with the R2R agreement.

Benefit

- Moderator role removed from process freeing up pressures on station based staff. This will allow them more time to concentrate on other workstreams
- Assessor has more quality time to focus on developing the candidate.
- Removal of costly and time-consuming process that is not aligned to the Brigade's vision for developing staff
- Increased levels of staff confidence in the Brigade's new learning vision

7 Summary of recommendations

- 7.1 The contents of this report generate two clear recommendations, as outlined below.
- 7.2 Part 1 – Decommission the ePDR system with effect from 31 December 2022.
- 7.3 Part 2 – Set a standard duration for development pay for all FF(D) staff – of 25 months - after which they will automatically receive competent pay.

8 Equality comments

- 8.1 The LFC and the Deputy Mayor for Fire and Resilience are required to have due regard to the Public Sector Equality Duty (section 149 of the Equality Act 2010) when taking decisions. This in broad terms involves understanding the potential impact of policy and decisions on different people, taking this into account and then evidencing how decisions were reached.
- 8.2 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.
- 8.3 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.
- 8.4 The Public Sector Equality Duty requires decision-takers in the exercise of all their functions, to have due regard to the need to:
- eliminate discrimination, harassment and victimisation and other prohibited conduct.
 - advance equality of opportunity between people who share a relevant protected characteristic and persons who do not share it.
 - foster good relations between people who share a relevant protected characteristic and persons who do not share it.
- 8.5 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:
- remove or minimise disadvantages suffered by persons who share a relevant protected characteristic where those disadvantages are connected to that characteristic.
 - 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.
- 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.
- 8.6 The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.
- 8.7 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:

- tackle prejudice
- promote understanding.

8.8 EIA Completed, see attached appendix 2.

9 Other considerations

Workforce comments

9.1 This document is to be shared with representative bodies for comments.

Sustainability comments

9.2 This report does not introduce any negative sustainability impacts, the proposed plan to remove PDRs will have a positive impact for staff. Prior to any new projects or policies that may arise from this report, the Brigade's Sustainable Development Impact assessment (SDIA) process will need to be completed.

Procurement comments

9.3 There are no commercial implications arising from this proposal. In future if there are any changes to the process of data capture and information management within the Babcock apprenticeship management, then the appropriate change process within the contract will be used to manage this. If any further systems are required, then ICT and Procurement will be approached through the relevant project and department engagement processes.

Communications comments

9.4 To work with internal communications team to develop a communications plan to ensure all staff groups are aware of the outcome of this paper in advance of any changes being implemented

10 Financial comments

10.1 This report recommends the decommissioning of ePDRs for Leading Firefighters, Sub-Officers, Station Officers, Firefighters on Development (FFDs), Station Commanders and Group Commanders. The financial impact of this change would be £0.17m for 2022/23, £0.47m for 2023/24 and £0.17m in future years. The £174,000 cost in 2022/23 will be funded from the Budget Flexibility reserve which has a forecast balance of £17,781,000 as at the end of the 2022/23 financial year, before this proposed draw. The investment required from 2023-24 onwards has been included as part of the LFC's 2023-24 Budget as an ongoing requirement and therefore built into the base budget.

11 Legal comments

11.1.1 The report makes recommendations for the decommissioning of ePDR's for the staff groups referred to in the report, and for ePDR's to be replaced by a new learning and professional development model that aligns with national qualifications and standards.

11.1.2 Section 7-9 of the Fire and Rescue Services Act 2004 ('2004 Act') provide that the London Fire Commissioner, as the relevant fire and rescue authority, shall secure the provision of training for personnel. Section 5A(1) of the 2004 Act enables the London Fire Commissioner to do anything he considers appropriate for the purposes incidental or indirectly incidental to his functional purpose.

- 11.3 The recommendations are therefore within the general powers of the London Fire Commissioner. Decommissioning eDPR's that are no longer fit for purpose and replacing it with a model that aligns with national standards, will ensure the London Fire Brigade remains efficient and effective, as required by S327A of the Greater London Authority Act 1999.

List of appendices

| Appendix | Title | Open or confidential* |
|----------|------------------------------|-----------------------|
| 1 | Excel-cost of removing PDR's | |
| 2 | EIA | |
| | | |

Part two confidentiality

Only the facts or advice considered to be exempt from disclosure under the FOI Act should be in the separate Part Two form, together with the legal rationale for non-publication.

Is there a Part Two form: ~~YES~~/NO*

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.

Once you open the template please save it on your OneDrive or SharePoint site. Do not open the template, fill it in and then click Save as this will override the template on Hotwire.

NOTE – All boxes MUST be completed before the document will be reviewed.

| |
|--|
| 1. What is the name of the policy, project, decision or activity? |
| Removal of Personal Development Records |

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

| | | | |
|-------------|---------------|---|------------|
| High | Medium | x | Low |
|-------------|---------------|---|------------|

| | | | |
|---------------------------------------|--|------------------------------|---|
| 2. Administration | | | |
| Name of EIA author | Group Commander John Carpenter | | |
| Department and Team | Learning & Professional Development | | |
| Date EIA created by author | 1 st July 2022 | | |
| Date EIA signed off by Inclusion Team | | | |
| Date Actions completed | | | |
| External publication | Are you happy for this EIA to be published externally? | Yes <input type="checkbox"/> | No <input type="checkbox"/> If No state why: |

| 3. Aim and Purpose | |
|---|---|
| What is the aim and purpose of the policy, project, decision or activity? | To remove Personal Development Records and replace it with the organisation Learning Model |
| Who is affected by this work (all staff, specific department, wider communities?) | Firefighter Development, Leading Firefighter, Sub Officers, Station Officers, Station Commanders & Group Commanders |
| What other policies/documents are relevant to this EIA? | |

| 4. Equality considerations: the EIA must be based on evidence and information. | |
|---|---|
| <p>What consultation and engagement has taken place to support you to predict the equality impacts of this work?</p> <p>Consultation must take place with ESGs (including RB ESGs), Learning Support and affected groups.</p> | <p><i>Consultation with Babcock Ltd, Equality Support Group and Outreach team</i></p> |

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> |
| Age (younger, older or particular age group) | Positive | <i>The removal of the PDR process will have a positive effect on all Officers from LFF – Group Commander. It will ensure all firefighters of all ages benefit from the competency rate of pay earlier than they currently do. For LFF to Station Officers, there will be no immediate effect on their pay as they currently receive competent rate of pay as soon as they are promoted. For Station Commander and Group Commanders, this is hugely beneficial as they will receive the competent rate of pay immediately on promotion in line with LFF to Station Officers, which they currently do not receive. This also affects the pensions of Station Commanders and Group Commanders in particular those on the 1992 Pension Scheme where they have 'x' amount of sixtieth ring fenced within the pension scheme. As soon as they are promoted, they will benefit from the last 365 days final salary before they retire. The average station commander and Group Commander complete their PDR on average</i> | |

| | | | |
|--|----------|---|---|
| | | around 15/16 months, so in effect bringing their competency rate of pay forward 15/16 months. | |
| Disability (physical, sensory, mental health, learning disability, long term illness, hidden) | Positive | <p>The removal of the PDR's will have a positive effect on those with neuro diverse needs and mental health illness, ie anxiety. Currently all evidence must be written up and uploaded on to the PDR systems. This can be very challenging, daunting and time consuming for individuals with say dyslexia.</p> <p>There are currently 640 staff, which equates to 14% of the operational workforce who are registered, with Learning Support, as neurodivergent. This number is increasing with weekly referrals for screenings and full diagnostic assessments.</p> | <p>There is a total of 60 Station & Group Commander currently shown on development (D) within this group 6% (4) are disabled.</p> <p>There is a total of 221 Firefighter Development (D) currently shown within this group 19% (19) are disabled.</p> |
| Gender reassignment (someone proposing to/undergoing/ undergone a transition from one gender to another) | Neutral | There is no detrimental effect on those undergoing or have undergone gender reassignment | |
| Marriage / Civil Partnership (married as well as same-sex couples) | Neutral | There is no detrimental effect on those who are married or in a civil partnership | |
| Pregnancy and Maternity | Positive | Unlike PDRs in which there is currently no flexibility on developing and assessing candidates operationally on the incident ground, the new OLM will allow training, development and career advancement to occur throughout pregnancy and on return | . |
| Race (including nationality, colour, national and/or ethnic origins) | Adverse | There is a detrimental effect on the basis of Race (including nationality, colour, national and/or ethnic origins). | There is a total of 60 Station & Group Commander currently shown on development (D) within this group 10% (6) being from BAME groups. |

| | | | |
|--|---------|---|--|
| | | <i>This is because there is a disproportionate number of white staff at SC / GC rank and will be considered competent and receive competent rates of pay earlier.</i> | <i>There is a total of 221 Firefighter Development (D) currently shown within this group 32,6% (72) being from BAME groups.</i> |
| Religion or Belief (people of any religion, or no religion, or people who follow a particular belief (not political)) | Neutral | <i>There is no detrimental effect on the basis of religion or beliefs</i> | . |
| Sex (men and women) | Adverse | <i>There is a detrimental effect on the basis of Sex.</i> This is because there is a disproportionate number of male staff at SC / GC rank and will be considered competent and receive competent rates of pay earlier. | <i>There is a total of 60 Station & Group Commander currently shown on development (D) within this group 10% (6) are female.</i> <i>There are a total of 221 Firefighter Development (D) currently shown within this group 28.5% (63) are female.</i> |
| Sexual Orientation (straight, bi, gay and lesbian people) | Adverse | <i>There is a detrimental effect on the basis of Sexual Orientation</i> This is because there is a disproportionate number of staff who have declared themselves as identifying as heterosexual at SC / GC rank and will be considered competent and receive competent rates of pay earlier. | <i>There is a total of 60 Station & Group Commander currently shown on development (D) within this group 8% (5) are LGB.</i> <i>There is a total of 221 Firefighter Development (D) currently shown within this group 9.5% (21) are LGB.</i> |

| |
|---|
| 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, parents, 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. |
| <i>No other groups will be affected other than those explained above.</i> |

| 7. Legal duties under the Public Sector Equality Duty (s149 Equality Act 2010) | |
|---|--|
| How does this work help LFB to: | |
| Eliminate discrimination? | By Removing PDRs this will align all ranks to the Competency rate of pay from promotion date. This will eliminate all discrimination between ranks. |
| Advance equality of opportunity between different groups? | By Removing PDRs this will align all ranks to the Competency rate of pay from promotion date. Currently Station Commander and Group Commanders are the only rank excluded from this when promoted. This brings equality across all ranks as the responsibilities for Station Commander and Group Commanders are the same as those who are competent. |
| Foster good relations between different groups? | This will hugely benefit the organisation as it brings inline all ranks around competency rate of pay when promoted. |

| 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 |
| Sex | Although the initial move to competent pay will have a potential adverse impact on women due to the demographic of the SC and GC groups, implementation of the Organisational Learning Model will give equal access to all groups for their development and preparation for promotion | Miriam Heppell |
| Race | Although the initial move to competent pay will have a potential adverse impact on staff from ethnic minority backgrounds due to the demographic of the SC and GC groups, implementation of the Organisational Learning Model will give equal access to all groups for their development and preparation for promotion | Miriam Heppell |

| | | |
|--------------------|--|----------------|
| Sexual Orientation | Although the initial move to competent pay will have a potential adverse impact on LGBTQ+ staff due to the demographic of the SC and GC groups, implementation of the Organisational Learning Model will give equal access to all groups for their development and preparation for promotion | Miriam Heppell |
| | | |

| 9. Follow up, actions and evaluation | | |
|---|--|------------------------------|
| Where the Inclusion Team or other stakeholders have recommended actions in order to demonstrate due regard, these must be recorded here and delivered in accordance with time scales. Additionally, what is the organisational learning in relation to this piece of work in regards to the Equality Act 2010. | | |
| Action recommended and person responsible for delivery | Target date Action to be completed by | Date action completed |
| | | |
| | | |
| Lessons learnt and evaluation | | |
| Free text | | |

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) | | Date | |
| Sign off by Inclusion Team | | Date | |
| Stored by | | | |
| Links | | | |
| External publication | Are you happy for this EIA to be published externally? | Yes <input type="checkbox"/> | No <input type="checkbox"/> If No state why: |

Workings to calculate the financial impact of removing PDRs on 31/12/2022

Average number of months to "competent pay" - under PDR and after PDR is removed

| Rank | Under PDR | After PDR is removed | No. of months competent pay is brought forward | Notes |
|-------|-----------|----------------------|--|-------|
| | months | months | by | |
| SC(D) | 16 | 0 | 16 | |
| GC(D) | 15 | 0 | 15 | |

Assumed Financial PDR removal date: 31/12/22

Recruitment forecast - provided by People Services

| Rank | 22/23 | 23/24 | 24/25 | 25/26 | 26/27 | 27/28 | Timing assumptions |
|-------|-------|-------|-------|-------|-------|-------|-------------------------------------|
| SC(D) | 37 | 13 | 13 | 13 | 13 | 13 | All start beginning of Q3 each year |
| GC(D) | 15 | 5 | 4 | 4 | 4 | 4 | All start beginning of Q3 each year |

Staff cost increase - Competent rate vs Development rate

| Rank | Annual £ | Monthly £ | Daily £ |
|------|-------------|--------------|------------|
| SC | 7,351 | 613 | 20.14 |
| GC | 8,923 | 744 | 24.45 |

Impact Days

In order to quantify the impact of this decision accurately by financial year, the modelling maps out the additional costs of competent pay from a specific date

The duration of the financial impact constitutes the Impact Days arising from the removal of PDRs. These Impact Days are then allocated across financial years, using the daily unit cost difference

Assumptions for existing SC(D) and GC(D) staff

As above, the average PDR completion time has been used in all calculations for existing staff.

Impact days by rank and financial year

| Rank | Impact Days | | | | | |
|------|-------------|--------|-------|-------|-------|-------|
| | 22/23 | 23/24 | 24/25 | 25/26 | 26/27 | 27/28 |
| SC | 5,670 | 16,263 | 6,344 | 6,344 | 6,344 | 6,357 |
| GC | 2,444 | 5,743 | 2,103 | 1,828 | 1,828 | 1,832 |

Estimated staff cost increase arising from the decision to remove PDRs and paying competent pay with effect from 1 January 2023

| Rank | Impact cost by FY £ | | | | | |
|---------------|---------------------|----------------|----------------|----------------|----------------|----------------|
| | 22/23 | 23/24 | 24/25 | 25/26 | 26/27 | 27/28 |
| SC | 114,186 | 327,513 | 127,759 | 127,759 | 127,759 | 128,021 |
| GC | 59,750 | 140,402 | 51,413 | 44,690 | 44,690 | 44,788 |
| Totals | 173,935 | 467,916 | 179,172 | 172,449 | 172,449 | 172,809 |

Rounded to nearest £k

| | | | | | | |
|--|---------|---------|---------|---------|---------|---------|
| | 174,000 | 468,000 | 179,000 | 172,000 | 172,000 | 173,000 |
|--|---------|---------|---------|---------|---------|---------|