

LONDON FIRE BRIGADE

Communications Directorate Restructure

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| Report to: | Date: |
| Investment & Finance Board | 26 January 2023 |
| Commissioner's Board | 7 February 2023 |
| Deputy Mayor's Fire and Resilience Board | 28 February 2023 |
| London Fire Commissioner | |

Report by: Helen Coleman, Director of Communications

Report classification:
For decision

For publication
Yes

I agree the recommended decision below.

A handwritten signature in black ink, appearing to read 'Andy Roe'.

Andy Roe

London Fire Commissioner

Date **This decision was remotely
signed on 16 May 2023**

PART ONE

Non-confidential facts and advice to the decision-maker

Executive Summary

The successful delivery of Your London Fire Brigade – our Community Risk Management Plan – is critical to the Brigade’s future and ensuring we are trusted to serve and protect London. Crucial to that delivery is a high performing and strategic communications function that can deliver integrated communications campaigns that are fully aligned to Your London Fire Brigade, with the voice of the community at heart. At present the Communications Directorate is not set up in the most effective way or making the best use of its resources. This paper proposes a new structure for the Communications & Engagement Directorate which will provide it with the structure and capacity it requires to make the best use of its resources, to help deliver change across the Brigade and enable the best possible service to London and Londoners.

Recommended decisions

For the London Fire Commissioner

- Approves the proposed new Directorate structure set out in this report
- Approves additional expenditure to a maximum of £502k from 2023/24 for the restructuring of the Communications Directorate, as provided for within the Brigade’s 2023/24 budget, including growth bids and savings proposals for the Communications Directorate.

1 Introduction and background

1.1 The successful delivery of Your London Fire Brigade – our Community Risk Management Plan – is risk critical to the Brigade’s future and ensuring it is trusted to serve and protect London.

- 1.2 Crucial to that delivery is a high performing and strategic communications function that can deliver integrated communications campaigns which are fully aligned to Your London Fire Brigade, with the voice of the community at its heart.
- 1.3 Until recently communications have not been a standalone Directorate and it is only in the last year the role of Director of Communications was created, and permanent Director appointed.
- 1.4 At present the Communications Directorate is not set up in the most effective way or making the best use of its resources. The department also carries a risk that is not have sufficient resource to meet the Brigade's communication demands.
- 1.5 Work is not currently aligned with Your London Fire Brigade and the role of communications in delivering the plan is not properly understood or planned. There is no strategic function, so channels are managed but not the issues, which creates risks for the Brigade.
- 1.6 The proposed name for the directorate is Communications & Engagement and the new structure is included as Appendix 1. The revised structure proposes creating four departments and introducing a communications planning function:
- Community Engagement
 - Internal Communications
 - Stakeholder Engagement
 - External Communications

2. Community Engagement

- 2.1 Community Engagement is a relatively new function in the Brigade, set up in 2020 at a cost of £172,000 a year, which funded three staff (a manager, senior officer, and officer) and a one-off £60,000 budget for engagement events. Since the function was established, we have been able to improve our relationships with the Grenfell community, run a series of pilots and start work on a new strategy which will set out how community engagement will be embedded across the brigade.
- 2.2 The Team currently consists of four staff:
- 1x Community Engagement Manager (FRS F)
 - 1 x Senior Community Engagement Officer (FRS E)
 - 1 x Community Engagement Officer (FRS D)
 - 1 x Admin Assistant, Temporary (FRS C)
- 2.3 The success of the team has meant that it is now too small to roll out these pilots Brigade-wide and fulfil its obligations in the Community Risk Management Plan (CRMP). The restructure proposes creating a standalone department which would provide much needed support to the expanding the work of the team. Build capacity to support the roll out of the community engagement pilot across all 33 London Boroughs, provide more dedicated support to communities in the aftermath of an incident and provide leadership and build community engagement capacity across the Brigade.

2.4 The revised structure team would be a team of six consisting of a:

- 1 x Head of Community Engagement (TMG C)
- 2 x Senior Community Engagement Officer (FRS E)
- 2 x Community Engagement Officer (FRS D)
- 1 x Admin Assistant (FRS C)

2.5 An annual non-staff budget of £100,000 has been requested to support the work of the Team. The initial Community Engagement Team budget was £60,000 in 2021/22 to run the pilot programme. No funding was provided in 2022/23 and an increased budget from 2023/24 onwards recognises the increased workload of the Team, the centrality it will play in rolling out and embedding Your London Fire Brigade and the nature of community engagement. This non-staff funding will deliver:

- A programme of engagement activities directly with identified vulnerable, seldom heard, or hard to reach communities to increase understanding of our services and how we can work with them.
- The continued roll out and development of the Community Forums.
- A series of focus groups and polling to understand community views on a range of issues including, building safety and regulation, fire safety, incident response and recovery.
- Establishing a programme of dedicated support to communities in the aftermath of an incident.

3. Internal Communications

3.1 Internal Communications is currently a corporate red risk. There is insufficient expertise to deliver the corporate communication strategy or support business-critical activity. Meaning staff are unable to understand or track our corporate change initiatives and cannot see how it improves what they do. At present the Internal Comms Team has:

- 1x Internal Comms Manager (FRS F)
- 2 x Internal Comms Officer (FRS C)
- 1 x temporary Senior Internal Comms Officer (FRS E)

3.2 A restructure of the Team will recognise the importance of Internal Communications creating a standalone department that will drive change and improve internal communication. A Head of Internal Communications will replace the Head of Brand & Events. The current Senior Internal Digital Comms Officer (FRS E) will move into the Internal Comms Team along with Internal Communications Manager, Transformation. The Events Team, who deliver the long service awards, all staff briefings, the staff conference and events such as LFB Pride and the Carol Service, will also form part of the new department.

3.3 To support this change in the long-term we will remove an Internal Comms Officer post and make the current temporary Senior Internal Comms Officer permanent. This will embed the new division and give it the expertise and experience to address the current risk and deliver the corporate communication strategy. It will also support the building of capability and consistency among all managers to communicate effectively with their teams.

3.4 The new Team would consist of:

- 1x Head of Internal Communications (TMG C)
- 1 x Internal Communications Manager (FRS F)
- 1 x Internal Communications Manager, Transformation (FRS F)
- 1 x Senior Internal Comms Officer (FRS E)
- 1 x Senior Internal Digital Comms Officer (FRS E)
- 1 x Internal Comms Officer (FRS C)
- 1 x Events Team Manager (FRS F)
- 2 x Senior Events Officers (FRS E)

4. Public Affairs

4.1 Demand on the three-strong Public Affairs team is significant and has grown substantially in the past year as such it was agreed in July 2022 for extra temporary resource to create a new Public Affairs Manager position at FRS Grade F and to regrade the Public Affairs Officer from FRS C to FRS D, to better reflect the requirements of the role.

4.2 Making these resources permanent will allow the team to be resourced properly and continue to build strong relationships with the GLA, Home Office and other key stakeholders. They also support the development and communication of the Brigade's policy in a number of key areas such as scrutiny committees, including but not limited to the Fire, Resilience and Emergency Planning Committee (FREPC). Ensuring the Brigade provides timely, relevant and accurate responses to Mayor's Questions every month, which together with scrutiny committees are a key part of the way LFB is held accountable by the Mayor and the GLA on behalf of Londoners.

4.3 Permanent resources enable support, advice and involvement in policy and position development around the Government's White Paper on Fire Reform, the implementation of the Fire Safety Act, the forthcoming Building Safety Regulator and the consultation on Emergency Evacuation Information Sharing. Bringing our stakeholder engagement out into fire stations with a greater emphasis on engaging with MPs, Assembly Members, local councillors, interest groups and others in the community, showing them how we work.

5. Print Room Team

5.1 We are also proposing to upgrade two staff in the Print Room, who will take additional responsibility for brand protection, as we have removed the Head of Brand role, to create the Head of Internal Communications position. The Print Room Team currently consists of a Digital Print Manager (FRS C) and a Digital Print Operator (FRS B). The team would become Digital Print Manager (FRS D) and a Digital Print Operator (FRS C).

6. Leadership

6.1 With a small Communications function, it is vital that we have experienced and capable leaders, who can provide the right level of strategic oversight and guidance. This year, the team has had supernumerary funding for a Deputy Director of Communication, which we will remove from the structure. Therefore, as we are removing the temporary Deputy post, we are proposing to upgrade our two remaining Heads (External and Internal

Communications) and creating a new Head of Community Engagement, so that they are at the same level as our Head of Stakeholder Engagement, and at the right level for the impact and scope of the roles.

- 6.2 This streamlines the management of the team creating a flatter structure and ensuring the roles better reflect their responsibilities across the board. It ensures all roles are aligned with each other and with similar roles across the organisation.
- 6.3 Heads of roles will take on a greater responsibility for strategic communications. Moving the directorate away from the reactive approach it currently adopts to ensure issues are managed effectively and the role of communications is impactful and delivering measurable change in behaviours or opinions. They will also provide greater leadership to the wider TMG providing expert advice and driving change. These changes also provide increased resilience during crises and major incidents.

6.4 The current structure is:

- Director of Communications – TMG A
- Deputy Director of Communications (temporary) - TMG C
- Head of Media, Digital & Internal Communications – FRS G
- Head of Community and Stakeholder Engagement – TMG C
- Head of Brand & Events – FRS G

6.5 It is proposed that this structure changes to:

- Director of Communications – TMG A
- Head of External Communications – TMG C
- Head of Stakeholder Engagement – TMG C
- Head of Community Engagement – TMG C
- Head of Internal Communications – TMG C

7. Communications Planning

7.1 We are proposing the creation of a Communication Planning Manager (FRS F) role to support the Directorate by driving a more strategic approach to our communications. The key aspects of the role include devising and delivering a new communications planning process to ensure our communications are aligned to LFBs strategic priorities and deliver maximum impact and influence across all our audiences. They will track future initiatives and decisions to develop and implement a communications planning and project management process that enables the team and the organisation to effectively identify, develop and plan all communications activity.

7.2 The role will develop and implement a process to ensure all communication activity is properly evaluated. Follow up on project successes and identify areas of improvement for future projects. Supporting the Communications Team to work effectively with the rest of the Brigade.

8. Communications Training & Development

8.1 The Communications team currently has no budget whatsoever for non-pay costs. Our staff have not received any training or development for many years and their capabilities are lagging as new communications skills and techniques emerge. We have therefore requested a small budget of £15,000 a year (approx. £350 per head) which will help the Directorate to receive or deliver:

- Chartered-level training for all Directorate staff in understanding audiences and in measurement and evaluation of outcomes.
- An exercise to test and train all Directorate staff in delivering major incident communication plan to maintain our major incident capability.
- Memberships of professional bodies, such as the Chartered Institute of Public Relations and Local Government Communications network. These provide additional access to training and resources.

9. Financial impact

9.1 The cost of the restructure will be funded fully from the Brigade's 2023/24 budget, including growth bids and savings proposals of £502,000 (net) for the Communications Directorate.

9.2 Breakdown of this restructure is outlined in the table below.

| Type of Investment | Team | Investment (£s) | Notes |
|--------------------|-------------------------|-----------------|--|
| Non-staffing | Community Engagement | £100,000 | The team will have a budget of £100k for community events. |
| Non-staffing | Departmental | £15,000 | Staff training and membership of professional bodies |
| Staffing | Community Engagement | £166,000 | To fund an additional officer and senior officer and upgrade the manager role in recognition of the broader strategic role they will play. |
| Staffing | Internal Communications | £13,000 | Support the creation of a standalone team. Make a temporary role permanent. |
| Staffing | Leadership | £43,000 | Upgrade to posts so they are at the right level to recognise the impact and scope now required. |
| Staffing | Public Affairs | £79,000 | Make permanent temporary posts agreed last year in recognition of the increased workload of the team. |
| Staffing | Planning | £72,000 | A new post to drive a more strategic approach to communications. |
| Staffing | Print Room | £14,000 | Upgrade two staff in recognition of extra responsibilities. |
| | Total | £502,000 | |

10. Equality comment

10.1 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.

10.2 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.

10.3 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.

10.4 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.

10.5 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.

10.6 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.

10.7 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.

10.8 A full EIA is included as Appendix 2

11. Financial comments

11.1 This report recommends that a new Communications and Engagement Directorate Structure is agreed at an additional ongoing revenue cost of £502,000 starting in the 2023-24 financial year. An additional ongoing budget for this cost for 2023/24 and all subsequent financial years was agreed in the LFC's Final 2023-24 budget. This included investment proposals of £546,000 and savings proposals of £44,000.

12. Legal comments

- 12.1 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 LFC specific or general directions as to the manner in which the holder of that office is to exercise his or her functions.
- 12.2 Additionally, by direction dated 1 April 2018, the Mayor set out those matters, for which the LFC would require the prior approval of either the Mayor or the Deputy Mayor for Fire and Resilience (the "Deputy Mayor").
- 12.3 Paragraph (b) of Part 2 of the said direction requires the LFC to seek the prior approval of the Deputy Mayor before "[a] commitment to expenditure (capital or revenue) of £150,000 or above as identified in accordance with normal accounting practices...".
- 12.4 The Deputy Mayor's approval is accordingly required for the LFC to approve the additional expenditure requested in this report.
- 12.5 The requested approval of the proposed Directorate structure fall within the LFC's Scheme of Governance and outside the Mayoral Direction and may be approved by the LFC.

List of appendices

List of Appendices

| Appendix | Title | Open or confidential |
|-----------------|---|-----------------------------|
| 1. | Proposed Communications Directorate structure | Open |
| 2. | Communications Directorate restructure equalities impact assessment (EIA) | Open |

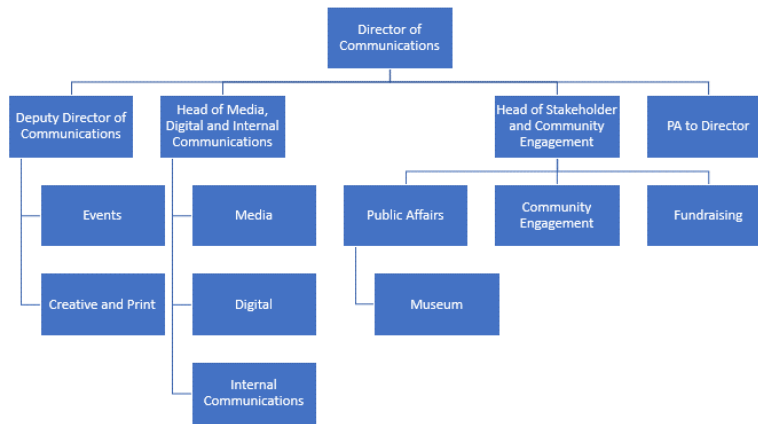
Part two confidentiality

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.

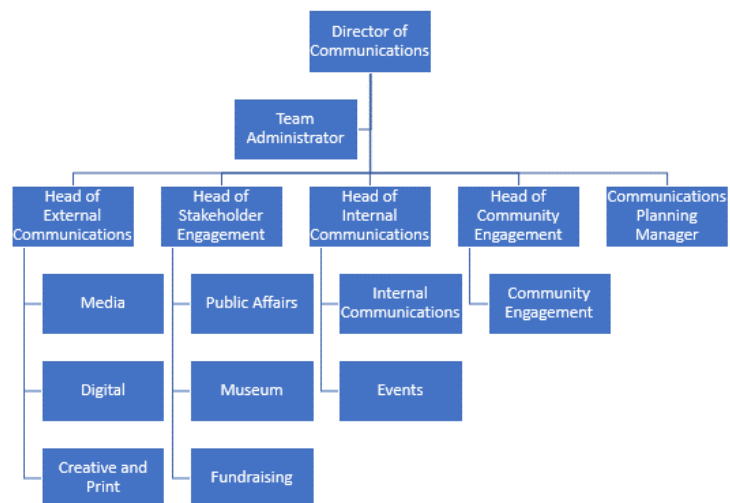
Is there a Part Two form: NO

Appendix 1 – Proposed Communications Directorate Structure

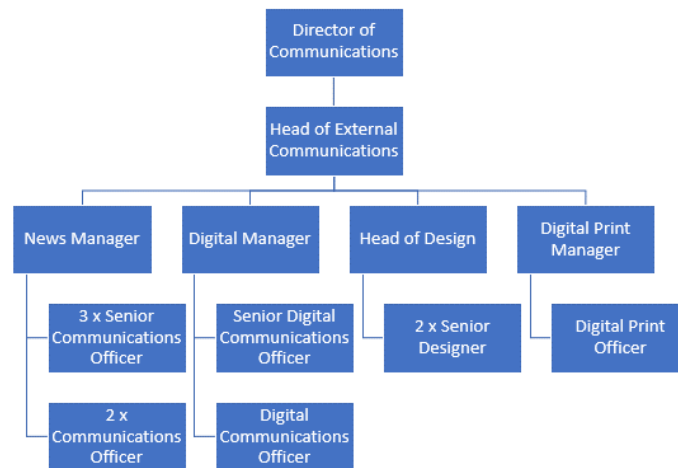
Current structure



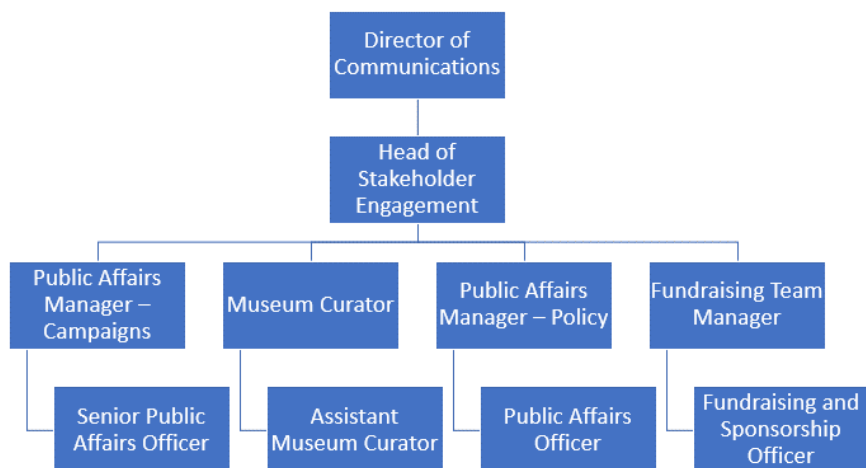
New structure from April 2023



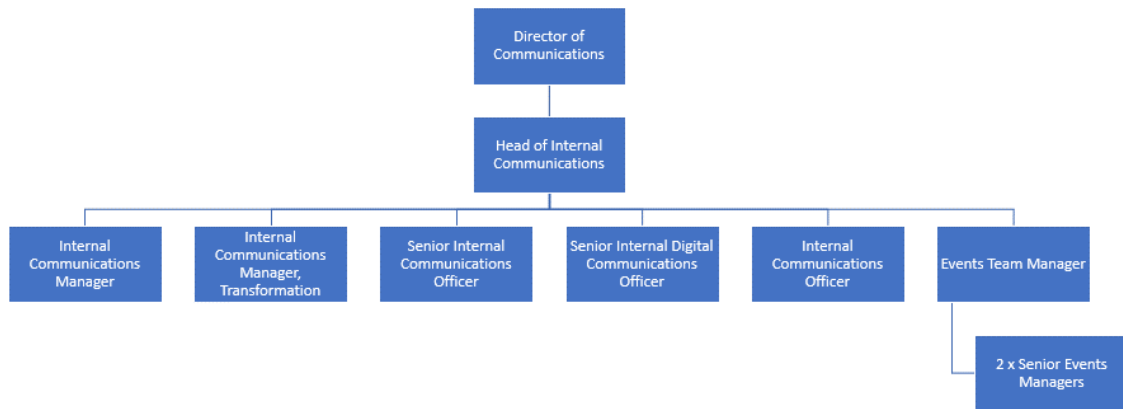
New structure – External Communications



New structure – Stakeholder Engagement



New structure – Internal Communications



New structure – Community Engagement





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Appendix 2: Communications Directorate Restructure Equalities Impact Assessment (EIA)

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.

| |
|--|
| 1. What is the name of the policy, project, decision or activity? |
| Communications Directorate restructure |

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

| | | | | | |
|------|--|--------|--|-----|---|
| High | | Medium | | Low | X |
|------|--|--------|--|-----|---|

| | |
|---------------------------|----------------------------|
| 2. Contact details | |
| Name of EIA author | Matt Jackson |
| Department and Team | Communications Directorate |
| Date of EIA | 11/01/2023 |

| 3. Aim and Purpose | |
|--|--|
| <p>What is the aim and purpose of the policy, project, decision or activity?</p> | <p>This EIA is being written specifically to support the proposal for the restructure of the Communication Directorate.</p> <p>The paper sets out the proposed restructure of the Communications Directorate. The new structure will delivery is a high performing and strategic communications function that can deliver integrated communications campaigns that are fully aligned to Your London Fire Brigade, with the voice of the community at heart.</p> |
| <p>Who is affected by this work (all staff, specific department, wider communities?)</p> | <p>All staff within Communications be affected by the proposed changes. This is due to the reorganisation of roles and teams within the new structure, there are also some new posts available so may expand some individuals line management responsibilities.</p> <p>We are seeking investment for the following posts:</p> <ul style="list-style-type: none"> 2 x TMG B 4 x FRS G 3 x FRS G temp 2 x FRS F 3 x FRS F temp 5 x FRS E 6 x FRS E temp 4 x FRS D 1 x FRS D temp 1 x DAC 1 x SC |

| 4. Equality considerations: the EIA must be based on evidence and information. | |
|---|---|
| <p>What consultation has taken place to support you to predict the equality impacts of this work?</p> | <p>Consultations with People Services are taking place regarding the implementation of the new structure.</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 | <p><i>The new positions when advertised will be applied equally to all employees under all nine protected characteristics including age.</i></p> <p><i>There is an opportunity to improve representation under all characteristics</i></p> | |
| Disability | Positive | <i>The new positions when advertised will include a statement that invites applications from</i> | Adverts |



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| | | | |
|---|-----------------|--|---|
| <p>(physical, sensory, mental health, learning disability, long term illness, hidden)</p> | | <p><i>underrepresented and protected characteristic groups</i></p> | <p>All adverts have the following statement:</p> <p>We value the diversity of our employees and aim to recruit a workforce which reflects our diverse communities across London. The London Fire Commissioner is an Equal Opportunities Employer and we positively welcome applications from all suitably qualified individuals, irrespective of people's age, disability, gender, race or ethnicity, religion or belief, sexual orientation, or other personal circumstances. We have guidance in place to ensure that all applicants are treated fairly and consistently at every stage of the recruitment process, including the consideration of reasonable adjustments for people who have a disability.</p> <p><i>On-line application form</i></p> |
| <p>Gender reassignment (someone proposing to/undergoing/ undergone a transition from one gender to another)</p> | <p>Positive</p> | <p><i>The new positions when advertised will include a statement that invites applications from underrepresented and protected characteristic groups</i></p> | <p>As above</p> |



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| <p>Marriage / Civil Partnership</p> <p>(married as well as same-sex couples)</p> | <p>Positive</p> | <p><i>The proposed roles will be normal working hours/flexible working/remote working which supports family life</i></p> | <p>Flexible Working Policy incorporating new home working policy</p> |
| <p>Pregnancy and Maternity</p> | <p>Positive</p> | <p><i>The proposed roles will be normal working hours/flexible working/remote working which supports family life</i></p> | <p>Flexible Working Policy incorporating new home working policy</p> |
| <p>Race (including nationality, colour, national and/or ethnic origins)</p> | <p>Positive</p> | <p><i>There is an opportunity to consider positive action in terms of recruitment – e.g. where ethnically diverse staff are underrepresented</i></p> | <p>Outreach team support</p> <p>Supports Togetherness Strategy (action 14 to support and develop inclusive leaders at all levels of the organisation to have increased confidence and ability to lead inclusively)</p> <p>Ethnicity pay gap report and improving representation</p> |
| <p>Religion or Belief (people of any religion, or no religion,</p> | <p>Positive</p> | <p><i>The new positions when advertised will include a statement that invites applications from</i></p> | |



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| | | | |
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| or people who follow a particular belief (not political) | | <i>underrepresented and protected characteristic groups</i> | |
| Sex (men and women) | Positive | <i>There is an opportunity here to increase representation at a senior level. Overall, the London Fire Brigade continues to have pay differentials in favour of women for median and mean pay rates</i> | Gender pay gap report |
| Sexual Orientation (straight, bi, gay and lesbian people) | Positive | <i>The new positions when advertised will include a statement that invites applications from underrepresented and protected characteristic groups</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>As above</i> |

| 7. Legal duties under the Public Sector Equality Duty (s149 Equality Act 2010) | |
|--|---|
| How does this work help LFB to: | |
| Eliminate discrimination? | The individuals recruited for the new positions will be based on their skills and/or experience. Hiring managers will be encouraged to participate in assessor panel training to eliminate bias when recruiting. |
| Advance equality of opportunity between different groups? | Mixture of internal and external post holders under the new proposal will assist in building a strong knowledge base and expertise. Skills training will be part of development contributing to positive action. Additionally, we will undertake positive action in recruitment both internally and externally. |
| Foster good relations between different groups? | To share good practice/expertise – consulting with Equalities Support Groups and keeping Trade Unions informed |



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| 8. Mitigating and justifying impacts | | |
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| 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 |
| Level of experience required at the proposed levels may inadvertently disadvantage younger applicants, | JDs include relevant qualifications or experience | Hiring managers |
| | | |
| | | |
| | | |

Now complete the RAG rating at the top of page 1:



High: as a result of this EIA there is evidence of stopped until further work is done to mitigate the

significant adverse impact. This activity should be 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.



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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 checked="" type="checkbox"/> | No <input type="checkbox"/> If No state why: |