

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

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**Report to:**

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

**Date:**

13<sup>th</sup> September 2022  
27<sup>th</sup> September 2022  
5<sup>th</sup> October 2022  
13<sup>th</sup> October 2022

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**Report by:**

Nicholas Davis Deputy Assistant Commissioner Learning and Professional Development

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**Report classification:**

For decision

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For publication

# 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 19<sup>th</sup> 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
<b>Totals</b>	<b>173,935</b>	<b>467,916</b>	<b>179,172</b>	<b>172,449</b>	<b>172,449</b>	<b>172,809</b>

## 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\*