

Protection Staff Retention

Report to:

Date:

Investment & Finance Board.....	1 June 2023
Commissioner’s Board	13 June 2023
Deputy Mayor’s Fire and Resilience Board.....	29 June 2023
London Fire Commissioner	

Report by:

Pamela Oparaocha – Deputy Assistant Commissioner

Report classification:

For decision

For publication

PART ONE

Non-confidential facts and advice to the decision-maker

Executive Summary

Historically, there has been a balanced mix of operational and FRS staff in Fire Safety (Protection), in recent years however the numbers of operational staff have diminished with the workforce of inspecting officers and fire engineers being predominantly FRS-based staff. Since the Grenfell Tower fire, there has been a significant uplift in Protection work as well as a protracted and significant market demand for competent technical fire safety staff from both public and private sector. Despite commencing in-house training, London Fire Brigade (LFB) continues to compete in a market for skilled staff that has seen salaries increase significantly over the last three years. This has impacted on retention and competency rates across Protection teams as technically qualified staff are lured away by salaries up to 40% higher than offered in LFB. This has resulted in a significant decline in the competency profile of the workforce, impacting on service delivery.

In addition, abatement rules limit the LFC's ability to re-hire on a full-time basis those technically qualified and experienced staff who have retired. If re-employed those persons could help develop new, inexperienced staff and support service delivery (e.g. complex audits) as required. The Fire sector in general and London specifically is facing a skills gap that will make it difficult to discharge the LFC's statutory obligations (including the work of the new Building Safety Regulator), address concerns raised in previous HMICFRS inspections and deliver an effective service. Developing and retaining competent staff is essential, as new staff generally take circa two and a half years to reach a level where they can audit complex or higher-risk buildings. This is at a cost of £15K to £18K per person.

Recommended decisions

For the Deputy Mayor

1. That the Deputy Mayor for Fire and Resilience authorises the London Fire Commissioner to commit revenue expenditure of up to £2,550,000, which is £850,000 per annum across financial years 2023/24, 2024/25 and 2025/26 for the purposes of the payment of a Market Rate Supplement (MRS) for specific Protection staff with accredited technical qualifications in the London Fire Brigade's (LFB's) Prevention and Protection department.
2. To commit further revenue expenditure of £1,500,472 to cover the cost of abatement across financial years 2023/24, 2024/25 and 2025/26 for a limited number of skilled staff within the Prevention and Protection Department.

This LFC decision will only be taken after further consultation with the Greater London Authority's finance and legal advisers and Corporate Investment Board.

For the London Fire Commissioner

1. The London Fire Commissioner commits revenue expenditure of up to £2,550,000, which is £850,000 per annum across financial years 2023/24, 2024/25 and 2025/26, for the purposes of the payment of a Market Rate Supplement (MRS) for specific Protection staff in the London Fire Brigade's (LFB's) Prevention and Protection department with accredited technical qualifications – minimum Fire Safety Level 4 Diploma and their (technically skilled/experienced) managers.
2. To commit further revenue expenditure of £1,500,472 to cover the cost of abatement across financial years 2023/24, 2024/25 and 2025/26 for a limited number of skilled staff within the Prevention and Protection Department.

1 Introduction and background

- 1.1 To Support the work of the new Building Safety Regulator LFB is expected to recruit 46 new Inspecting Officers (IOs) and circa 12 fire engineers. To achieve this LFB must recruit circa 100 Fire Safety Advisers (FSAs) which will also support filling current vacancies for Fire Engineers, Team Leaders, Deputy Team Leaders.
- 1.2 This is at a time when there is both a protracted and significant market demand for competent technical fire safety staff from both public and private sector alike. This is exacerbated by the complexity of London's real estate, with over 50% of the entire national risk in terms of high-rise residential buildings (HRRBs) being located in the Capital, further driving demand in the private and public sectors.
- 1.3 In recent years, Fire Safety (Protection) has suffered a critical drop in competency in its frontline service delivery workforce – across the North and South delivery teams competency rates are below 30%. This is due to a range of factors including retirements (mainly operational staff) and staff leaving to work in the public or private sector for much higher remuneration packages. Examples include a FRS Team Leader and an Inspecting Officer (IO) both being offered Fire Safety roles in the NHS with a circa £20k uplift in salary, and other IOs and Fire Engineers being offered roles in public and private sector for up to and in some cases exceeding, a £35k uplift.
- 1.4 Since October 2022, in LFB's Protection team, 18 Fire and Rescue staff (FRS) have left to take up positions in the public and private sectors due to significantly enhanced remuneration packages. In the same period, five operational staff have retired having reached pensionable age – two have returned on a part time basis and all have expressed a desire to return to work post-retirement but feel unable to do so due to abatement rules. The general principle behind abatement is to protect the public purse from paying a pension and a salary to the same individual i.e. the income from the public purse should not be increased by the addition of a pension.

- 1.5 LFB have seen a circa 50% drop in the competency rate in inspecting officers (those who are fully qualified and have gained experience) in just 12 months and even with active recruitment, this needs to be considered against the approximate development time of circa 2½ years to bring new officers up to a sufficient competency level so that they can inspect high rise residential buildings (HRRBs) and 4-5 years+ to achieve competent fire engineer status.
- 1.6 While LFB continues to pay salaries that are significantly lower than can be commanded in the private and public sectors, it is likely that staff will continue to leave. A market rate supplement paid to technically skilled fire safety professionals and their (technically skilled/experienced) managers within Protection may be one of a range of initiatives that could significantly slow down the rate at which people are choosing to leave.
- 1.7 Recruiting specialist staff is also difficult despite several interventions, including the Centre of Learning and Excellence, providing professional qualifications up to and including Fire Engineering degrees.
- 1.8 Additionally, abatement rules limit LFB's ability to re-hire technically qualified experienced staff, who have retired on a full-time basis. Such staff could both help develop new, inexperienced staff and support service as required. The Fire sector in general and London specifically is facing a skills gap that will make it difficult to discharge the LFC's statutory obligations (including the work of the new Building Safety Regulator), address concerns raised in previous HMICFRS inspections and deliver an effective service.
- 1.9 Engagement with the Home Office has made it clear that His Majesty's Treasury relaxation of abatement rules, or being able to use Protection Uplift funding, are not viable options. It is therefore recommended that the LFC agree to pay abatement in a defined way which has previously been agreed in FEP2795 (2017) and subsequently in LFC-O075-D (2018).

Market Rate Supplements

- 1.10 Market Rate Supplements (MRSs) result in pay differences so care must be taken to ensure compliance with equal pay legislation. The Institute of Employment Studies stated that MRSs must be awarded on an individual basis to jobs that warrant their award; these are determined by external market forces that, in this instance, apply. A market rate supplement is an exceptional measure – it can only be taken when every other measure has been exhausted. Current circumstances can be considered exceptional. This proposal is being made using robust benchmarking data and will be subject to annual review to ensure compliance with equal pay legislation.
- 1.11 This paper seeks to establish a one-off payment each year for three years, with a review after one year, for those in a technical Protection role - subject to the ongoing People Services review of FRS pay. This supplement should include technical staff and their managers and would be set on a sliding scale of up to 10% depending on the qualification and market comparison.
- 1.12 The value of a MRS is determined by the difference between the top point of normal salary progression in the grade for the job (as determined by job evaluation) and the market rate for the job in question. However, it should not be salary alone that determines the final salary uplift percentage – other benefits and rewards should be taken into consideration. LFB have a range of active measures in place to address the staffing and competency issues, including a dedicated in-house training academy (supported by external formal qualifications) and a pilot

to bring operational staff back into Protection teams. A robust process for determining the value of the MRS should be followed and be led by qualitative market data to support the business case.

- 1.13 Research by the Institute for Employment Studies completed in November 2017 found the market rate supplements improved retention and increased staffing levels in nursing between 2009 and 2013/14. The impact on recruitment was patchy (but positive) and recruitment of senior nurses remained challenging. The review stated that MRS provided value for money.
- 1.14 Overall, the Institute for Employment Studies report found that ‘we need to utilise a full range of (financial) incentives to help make this an attractive place to work’. Pay was described as ‘one lever in the set of tools’ required to manage the migration of skilled workers.
- 1.15 It is also noted that Essex Fire & Rescue Service had also recently¹ offered market rate supplements for fire safety staff– while noting that Essex has nothing like the level of demand of London. Clearly there are factors beyond pay that make a job attractive – the Employee Value Proposition includes other factors including the organisation’s values, culture, location, promotion, pension, training etc.
- 1.16 LFB offers industry-leading qualifications for Fire Safety Advisors, Inspecting Officers and Fire Engineers and a brand that is over 150 years old with the legal authority to enforce legislation and prosecute offenders. Offering staff access to additional qualifications (level 5, 6 and 7 diplomas) would be an incentive for staff and could increase the length of their tenure with LFB.

Appendix 1: Pay Comparison

Buy back clause for qualifications

- 1.17 It is important that LFB provides efficiency and value for money. While staff cannot be financially or contractually compelled to remain with LFB, a cost recovery for higher level qualifications is currently being explored. New staff that join as Fire Safety Advisors receive training that includes a Level 3 qualification. As this is an essential part of their role, therefore a buy-back clause cannot be implemented. However, for higher qualifications (Level 4 to Level 7), a buy-back clause is being actively explored to offset part of the cost of developing a staff member if they leave LFB within a specified period after obtaining the level 4 to 7 qualification.

Abatement

- 1.18 The expectation set out in the Fire and Rescue National Framework for England’s (the Framework) expectation is that when reappointing officers at any level, that the requirements of part 6 of the Framework are considered. The Framework requires that:

“Fire and rescue authorities must not re-appoint principal fire officers after retirement to their previous, or a similar, post save for in exceptional circumstances when such a decision is necessary in the interests of public safety. Any such appointment must be transparent, justifiable and time limited...

In the exceptional circumstance that a re-appointment is necessary in the interests of public safety, this decision should be ... a publicised decision ... The reason why the re-appointment was necessary in the interests of public safety, and alternative approaches were deemed not appropriate, must be published and the principal fire officer’s pension must be abated until they cease to be employed by a fire and rescue authority.

To ensure greater fairness and the exchange of talent and ideas, all principal fire officer posts must be open to competition nationally, and fire and rescue authorities must take account of this in their workforce planning.

While the above requirements only extend to principal fire officers, we expect fire and rescue authorities to have regard to this principle when re-appointing at any level.”

- 1.11. Having considered the National Framework it is considered that the current abatement rules hamper LFB’s ability to re-hire qualified staff who have retired. This reduces the availability of competent personnel to train, mentor and develop new staff, as well as undertaking higher risk inspection work. This is likely to impact on LFB’s ability to deliver a service that can target risk as well as meeting the ambitions of the BSR. This may have a detrimental impact on public safety.
- 1.12. Under the Firefighters’ Pension Scheme 2015 (FPS 2015), and the Local Government Pension Scheme 2014 (for benefits built up post-2014), abatement of pension on re-employment no longer applies. This issue, therefore, pertains to firefighters retired under the schemes in operation from 1992 until 2015. Until 2013, abatement for these staff only applied to re-employment as a firefighter by an FRS. Amendments to the FPS 1992 made in 2013 changed that to re-employment ‘in any capacity’ by an FRS. This brought re-employment of retired fire and rescue staff in non-operational roles such as fire engineering within scope of the abatement rules.
- 1.13. Addressing the abatement issue is not seen as the panacea to all the staffing challenges faced by the Brigade, but rather as a key enabling tool that will support the delivery of core business and work of the BSR, which in turn will help to protect the communities we serve.
- 1.14. It should be noted that the London Fire Commissioner recently engaged with the Home Office, who have made it clear that His Majesty’s Treasury relaxing abatement rules, or being able to use Protection Uplift funding to pay for abatement, are not viable options.
- 1.15. The National Fire Chiefs Council 2021 Paper: Abatement – the case for a relaxation of rules for specialist protection staff suggests that Fire and Rescue Services could lose 30-40% of their competent and qualified protection staff over the next 5 years. With over 30% of staff currently aged between 46 and 55 the current situation is unlikely to improve without an intervention.
- 1.16. In London, one of the major obstacles to improved competency rates is the lack of competent staff to train, mentor and develop new staff, as well as undertaking higher risk inspection work. This is likely to impact on LFB’s ability to deliver a service that can target HRRBs as well as the ambitions of the BSR. Currently LFB’s post-retirement Fire Safety professionals work on a part time basis. Their skills and experience remain in great demand across the department. But currently returning to work for LFB is not an attractive proposition because other employers – including local authorities or NHS - pay more without the reduction in pension that comes with working for LFB post-retirement.
- 1.17. This inability to bring back experienced staff who have retired from operational ranks exacerbates the issues, as it reduces availability of competent staff to train, mentor and develop new staff, as well as undertaking higher risk inspection work. This is likely to impact on LFB’s ability to deliver a service that can target HRRBs as well as the ambitions of the BSR.
- 1.18. Provision to relax abatement in other key public sectors has already been made, for example in the NHS, in order to help deliver key services to the public. The Metropolitan Police Services (MPS) also offers an enhanced return scheme that allows police officers to retire from the Met

and return as an attested officer after a short break of service. This scheme that will be in place till June 2025 allows an officer to take their full pension and monthly salary.

Objectives and expected outcomes

- 2.1 If the MRS is paid at 10 per cent for all qualifying staff, the cost to the Prevention and Protection department would be circa £850,000 and would be absorbed within the existing budget by ringfencing the department underspend for 2022/23. The department underspend was £3,700,000 in 2020/21 and £5,200,000 in 2021/22. The underspend is expected to fall as LFB recruits. An underspend of £1,341,742 has been ringfenced from the 2022/23 budget and placed into an earmarked reserve.
- 2.2 Where necessary a vacancy gap of up to ten posts will be maintained to cover the annual cost of the MRS and Abatement - £1,350,000 - along with any natural department' underspend. Where it exceeds the underspend (created by the vacancy gap and any natural underspend) the £1,341,742 that has been ringfenced from the 2022/23 budget will be used to ensure that costs do not exceed the department budget.
- 2.3 Research by the Institute for Employment Studies completed in November 2017 found the market rate supplements improved retention and increased staffing levels in nursing between 2009 and 2013/14. The impact on recruitment was positive. The review stated that MRS provided value for money.
- 2.4 In respect of abatement, the LFC can exercise its discretion under the 1992 and 2006 pension schemes to withdraw the whole or part of any pension for any period in which the person entitled to it is employed in any capacity by the LFC. Whilst it is anticipated that recruitment numbers would be low, e.g. a maximum of 10-15, even such a small cohort of key and experienced staff would have a positive impact on the training and development of new staff, as well as undertaking specific higher risk work the detail of which has already been outlined in this report.
- 2.5 The recruitment process would be open and transparent and in accordance with established policy. Offers will only be made directly to specific applicants possessing the necessary skills and qualifications to undertake the role.

Cost

Market Rate Supplements:

- 2.6 The Budget is divided in the following way:

Service Delivery	Budget	Percentage
FRS	5,429,585	68%
Operational	2,523,937	32%
Central Teams		
FRS	3,436,281	65%
Operational	1,841,237	35%
Service Improvement		
FRS	2,907,684	91%

Operational	289,305	9%
Total	16,428,029	

- 2.7 As the recruitment for new Inspecting Officers and Fire Safety Advisors progresses, ongoing MRS costs are expected to be covered through government grant funding. The NFCC have confirmed that for reimbursement through grant funding (for which a maximum charge has been set); and for charging on a 'bill back of hours' basis, they have included a 10% 'allowance' to account for salary uplifts for technical staff.

3. Equality comments

- 3.1 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.
- 3.2 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.
- 3.3 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.
- 3.4 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.
- 3.5 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.
- 3.6 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.
- 3.7 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.
- 3.8 With the current cost of living crisis and the rise in state pension age (currently set at 66 years old for both men and women but is set to gradually increase again from May 2026 for those born after April 1960), based upon the economic labour market official statistics, there has been a gradual increase in the age at which both men and women stop working. By providing a competitive salary the Brigade are affording older people the opportunity to continue within a role, benefitting their economic circumstances and equally as important, utilising an invaluable skillset beneficial to both the Brigade and the communities we serve.
<https://www.gov.uk/government/statistics/economic-labour-market-status-of-individuals-aged-50-and-over-trends-over-time-september-2022/economic-labour-market-status-of-individuals-aged-50-and-over-trends-over-time-september-2022#average-age-of-exit-from-the-labour-market>
- 3.9 An Equality Impact Assessment (EIA) has been conducted to recognise and mitigate any adverse or unduly favourable impact on all protected characteristics as referenced within the 2010 Equality Act. (Appendix 2 – Equality Impact Assessment). The EIA identified that the abatement, at this time, is likely to positively impact more male operational personnel than female operational personal due to the current breakdown of operational staff (men and women). However, this current disproportionate positive impact for men will only affect those subjected to the 1992 and 2006 LFB pension schemes.

4. Comments

- 4.1 Following consultation with People Services, consideration is being given to implementing MRS within existing mechanisms, this could include paying SRAs. Plans are also being scoped to seek additional training for staff to support professional and personal growth and development. The existing management structure will also need to grow to support the increase in team sizes providing more opportunities for staff to progress.

Sustainability comments

- 4.2 As the recruitment for new Inspecting Officers and Fire Safety Advisors progresses, the LFC will no longer pay the MRS as these ongoing costs will be covered through government grant funding. The NFCC has confirmed that for reimbursement through grant funding (for which a maximum charge has been set); and for charging on a 'bill back of hours' basis, they have included a 10% 'allowance' to account for salary uplifts for technical staff.
- 4.3 The impact of MRS will be reviewed annually to assess the financial situation ensuring the MRS remains feasible. Consideration would be given to adjusting budgets, exploring new funding sources – including revenue generation and grant funding. Cost saving through efficiency improvements where they can be made would also be considered.
- 4.4 The department would also seek to develop a comprehensive long term plan that outlines steps needed to gradually increase the department budget over time. This plan would consider both short and long term financial goals.

Procurement comments

4.5 None

Communications comments

4.6 None

5. Financial comments

- 5.1 The LFC is seeking to agree a market rate supplement for affected staff, for a three year period. This is at an estimated total cost of £2,550,000, which is made up from spends of £850,000 across financial years 2023/24, 2024/25 and 2025/26. These costs (MRS and Abatement) will be contained within the existing staff budget for Fire Safety based on forecast vacancy levels. Any costs identified above this will be met from the £1,341,742 Prevention and Protection reserve that has been created as part of the 2022/23 Financial Outturn report. A review will be undertaken during 2024/25 and subsequent years to ensure the spend does not exceed the reserve amount and then reported on as necessary as part of the published Quarterly Financial Position reports.

6. Legal comments

- 6.1 This report seeks approval to secure and pay an uplift in salary costs for the Fire Safety (Protection) unit and the relaxation of abatement rules for the purpose of staff recruitment and retention.
- 6.2 Under section 9 of the Policing and Crime Act 2017, the London Fire Commissioner (the "Commissioner") 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 Commissioner specific or general directions as to the manner in which the holder of that office is to exercise his or her functions.
- 6.3 By direction dated 1 April 2018, the Mayor set out those matters, for which the Commissioner would require the prior approval of either the Mayor or the Deputy Mayor for Fire and Resilience (the "Deputy Mayor"). Paragraph (b) of Part 2 of the direction requires the Commissioner 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...". Accordingly, the expenditure identified in this report requires prior approval.
- 6.4 Additionally, paragraph 3.1 of the direction states that, "The Deputy Mayor for Fire shall be consulted as far as practicable in the circumstances before a decision on any of the following is taken: ... Any other decision that can be reasonably considered to be novel, contentious or repercussive in nature, irrespective of the monetary value of the decision involved (which may be nil)." Accordingly the Deputy Mayor is to be consulted on the proposal in respect of the provisions of the Fire and Rescue National Framework prepared by the Secretary of State ("Framework").
- 6.5 When carrying out his functions, the Commissioner, as the fire and rescue authority for Greater London, is required to "have regard" Framework (Fire and Rescue Service Act 2004, section 21).
- 6.6 To have regard does not mean to follow slavishly, if the Commissioner wishes to depart from the Framework, he may, but he must take a conscious decision to do so, he must have a good reason for doing so and he must explain his reasoning.

6.7 The Framework sets out the following:

- The re-appointment of principal fire officers to the same or similar posts within the same fire and rescue authority, a short time after they have retired, has caused concern in recent years and increases costs for taxpayers. These individuals very often receive their pension benefits on retirement (such as their tax free lump sum) and then return on favourable terms, including an increase in take-home pay through avoiding paying employee pension contributions.
- Fire and rescue authorities must not re-appoint principal fire officers¹ after retirement to their previous, or a similar, post save for in exceptional circumstances when such a decision is necessary in the interests of public safety. Any such appointment must be transparent, justifiable and time limited.
- In the exceptional circumstance that a re-appointment is necessary in the interests of public safety, this decision should be subject to agreement by a public vote of the elected members of the fire and rescue authority, or a publicised decision by the appropriate elected representative of the fire and rescue authority, taking into account the legislative requirements of PCC FRA Chief Fire Officer appointment procedures. The reason why the re-appointment was necessary in the interests of public safety, and alternative approaches were deemed not appropriate, must be published and the principal fire officer's pension must be abated until they cease to be employed by a fire and rescue authority.
- To ensure greater fairness and the exchange of talent and ideas, all principal fire officer posts must be open to competition nationally, and fire and rescue authorities must take account of this in their workforce planning.
- While the above requirements only extend to principal fire officers, we expect fire and rescue authorities to have regard to this principle when re-appointing at any level.

6.8 When re-hiring retired staff it is a requirement of the Framework that the above issues are considered.

6.9 The Commissioner should be clear that the hiring of retired staff members and the payment of an abatement meets the requirements of the Framework. Therefore, if the Commissioner is of the view that any part of the Framework's requirement is not met then either the proposals in this report must be amended until they are compliant with the Framework or the Commissioner may decide to depart from the Framework and proceed with the recommendations as drafted if he has good reason for doing so (and that reason must be explained).

6.10 The proposals in this report set out in detail the challenges in recruiting staff and the public safety impacts occasioned by these challenges and, if the Commissioner is so minded, provide reasonable justification to depart from the provisions of the National Framework in respect of the rehiring of retired staff and the payment of sums in relation to pensions abatement.

6.11 The Brigade's Pay Policy Statement 2023/24 (PN 821) states that:

- "Unless there are exceptional circumstances, LFC's policy is to abate an employee's pension where the scheme rules provide for it, where the employee is a pensioner of the LFC and the combined remuneration from pay and pension exceeds the final pensionable salary of the employee. Between November 2017 and September 2020, the LFC did not apply abatement to re-employed fire safety inspecting officers and other suitably qualified fire safety specialist officers due to skills shortages and fire safety work volumes following the Grenfell Tower

incident. Since September 2020 normal abatement provisions have been re-instated in Fire Safety, and therefore apply across all departments.

- The LFC endorses the Home Office’s policy position which is included in the Fire and Rescue National Framework (May 2018), i.e. fire and rescue authorities must not re-appoint principal fire officers after retirement to their previous, or a similar, post save for in exceptional circumstances when such a decision is necessary in the interests of public safety. Any such appointment must be transparent, justifiable and time-limited. In the exceptional circumstance that a re-appointment is necessary in the interests of public safety, this decision should be subject to agreement by a public vote of the elected members of the fire and rescue authority, or a publicised decision by the appropriate elected representative of the fire and rescue authority, taking into account the legislative requirements of PCC (Police and Crime Commissioner) FRA (Fire and Rescue Authority) Chief Fire Officer appointment procedures. The reason why the re-appointment was necessary in the interests of public safety, and alternative approaches were deemed not appropriate, must be published and the principal’s fire officer’s pension must be abated until they cease to be employed by the fire and rescue authority.”

- 6.12 If the Commissioner’s agrees the recommendations set out in this report then the provisions of the Pay Policy Statement set out above are to be interpreted as though the Commissioner’s decision on this report amends the Pay Policy Statement so it accords with the Commissioner’s decision on this report.
- 6.13 The statutory basis for the actions proposed in this report is provided by the Fire and Rescue Services Act 2004 (‘the 2004 Act’), under which the Commissioner must make provision for the purpose of fire safety (s6). In accordance with the provisions of s112 of the Local Government Act 1972 the Commissioner may also “appoint such officers as they think necessary for the proper discharge by the authority of such of their or another authority’s functions as fall to be discharged by them ...An officer appointed ... shall hold office on such reasonable terms and conditions, including conditions as to remuneration, as the authority appointing him think fit.” Under the 2004 Act the Commissioner may also do anything that they consider incidental or indirectly incidental to his core functions (s5A):
- 6.14 The recommendations are therefore within the LFC’s powers, and the proposal will ensure the LFC can discharge his functions both efficiently and effectively.
- 6.15 These comments have been adopted from those provided by the LFC’s General Counsel Department in report LFC-23-061 to the LFC.

List of appendices

Appendix	Title	Open or confidential*
1	Pay Comparisons	Open
2	EIA	Open
3	Prevention & Protection staff data	Open
4	LFB Equalities Data	Open
5	Business case	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

Originating officer declaration

Reporting officer to
confirm the following
by using 'x' in the box:

Reporting officer

[Report author] has drafted this report and confirms the following:

1. Assistant Director/Head of Service

Charlie Pugsley has reviewed the documentation and is satisfied for it to be referred to Board for consideration

2. Advice

The Finance and Legal teams have commented on this proposal:

Yvette McEntee Legal Advisor, on behalf of General Counsel (Head of Law and Monitoring Officer).

David O'Sullivan Financial Advisor, on behalf of the Chief Finance Officer.

X

X

Appendix 1

Pay Comparisons – April 2023

Role - Market Comparison	LFB Salary Band and Grade
Fire Safety Managers circa £65K (Reed)	FRS F 49,754 to 64,606
Fire Safety Team Leaders circa + £60K (Camden Council)	FRS E 41,653 to 49,754
Assistant Fire Safety Managers circa £48K (Reed)	FRS D 38,721 to 44,333
Fire Safety Inspecting Officer circa £56K Marks Consulting	FRS D 38,721 to 44,333
Fire Engineer Technician £36K Glassdoor	FRS D 38,721 to 44,333
Fire Engineer circa £55K Reed Experienced Fire Engineer circa £65K Carriera	FRS E 41,653 to 49,754
Senior Fire Engineer circa £87K Jooble Fire Safety Manager £55,439 - £67,313 Newham Council (Plus Market Supplement of £10k per annum for 2 years) Fire Safety Manager £70,000 – 75,000 Shirley Parsons	FRS F 49,754 to 64,606
Principal Fire Engineer circa £110K Glassdoor	FRS G 66,100 to 82,103
Fire Safety Advisors are paid a similar rate	FRS C 32,586 to 39,119

LFB Rate - April 2022

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?

Protection Staff Retention

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

High		Medium		Low	X
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2. Administration

Name of EIA author	Karen Bell		
Have you attended an EIA Workshop	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
Department and Team	Fire Safety - Protection		
Date EIA created by author	May 2023		
Date EIA signed off by Inclusion Team			
Date Actions completed			
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:
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3. Aim and Purpose

What is the aim and purpose of the policy, project, decision or activity?	<p>To provide a salary that is reflective of the market rate and therefore affording LFB the tools to recruit, retain, and maintain competency across Prevention and Protection, focussing on the roles of Fire Safety Inspectors/Deputy Team Leaders, Fire Safety Managers/team Leaders, Managers/Team Leaders, Fire Engineers, and Senior Fire Engineers. The wellbeing of Fire Safety Advisers and Engineer Technicians are also taken into consideration within the proposal, albeit not eligible for proposed Market Rate Supplement (MRS).</p> <p>The proposal of uplift in pay is due to a change in legislation that has impacted the fire and building sectors. London Fire Brigade have been asked by government to recruit Inspecting Officers and Fire Engineers to work with the Building Safety Regulator under the HSE. The need for this piece of work is national and affects not only fire and rescue services but also local authorities and the private housing sector who are all bound by the same legislation. This has resulted in London Fire Brigade having to compete with local authorities and private sector housing providers for skilled staff that are offering much higher salaries than currently paid by London Fire Brigade.</p>
Who is affected by this work (all staff, specific department, wider communities?)	The work undertaken by Prevention and Protection Teams affect all communities served by LFB. The recommended proposals within the document referenced within this EIA directly affect those staff groups (present and future) listed above within the section ' <i>What is the aim and purpose of the policy, project, decision or activity?</i> '
What other policies/documents are relevant to this EIA?	<p>Community Risk Management Plan (CRMP) 2023-2029 https://www.london-fire.gov.uk/about-us/your-london-fire-brigade-our-plan-for-2023-29/</p> <p>HMIFRS Report 2021/22 https://www.justiceinspectors.gov.uk/hmicfrs/news/news-feed/london-fire-brigade-still-has-much-to-do/</p> <p>Fire Safety (England) Regulations 2022 and amendments January 2023 https://www.gov.uk/government/publications/fire-safety-england-regulations-2022</p> <p>Equality Act 2010 https://www.legislation.gov.uk/ukpga/2010/15/contents</p> <p>Additional LFB policies and documents as listed within section 5</p>

4. Equality considerations: the EIA must be based on evidence and information.

What consultation and engagement has taken place to support you to predict the equality impacts of this work?

Consultation must take place with ESGs (including RB ESGs), Learning Support and affected groups.

Consultation with ESG groups, Learning support, LFB Inclusion & Well-being Team and Legal has taken place

5. Cultural consideration: the EIA must consider how the work improves the culture of the organisation

How does this piece of work contribute to improving the culture of the organisation? How does this piece of work improves staff divides? Can you provide evidence?

Within HMICFRS 2021/22 report it is noted *“The Brigade knows its needs to improve on workplace planning. Currently, it doesn’t have enough staff to fill roles in critical areas, such as the protection team...”* (page 41). Further reference to the skillset within protection *“we also found a shortage of qualified protection staff was affecting the level of service it could offer to the public.”* (page 46). 201 technical qualified staff with a minimum Level 4 Fire Safety diploma against an establishment of 252 (21% shortfall) (February 2023 LFB data)

With the current disparity in pay between the private sector and public sector creating a financial opportunity for Protection staff to leave the Brigade, the numbers of FRS personnel within the inspecting teams have fallen considerably. Exit Interview data shows that 10 members of staff (1 female/9 male) from the Inspecting Teams have left LFB, during the period of October 2022 – April 2023, with pay cited as a reason for departure. This in turn impacts upon the pressures put on the remaining staff to meet the legal requirements of the Brigade. By providing the uplift in pay, the Brigade will be able to retain the current staff by providing greater financial security and reducing health conditions as result of working excessively to compensate for the lack in personnel numbers. Additionally, the Brigade will be able to recruit, within a competitive market, additional staff with the confidence that the uplift in pay will close the gap between the private and public sector, making LFB more desirable.

In relation to recruitment, this proposal will be subject to its own EIA or fall within a strategy/policy and its associated EIA already in existence. The CRMP states *“London is home to an increasingly diverse group of*

	<p><i>people, and it is important that, as an organisation, we are representative of the communities we serve and that our services are accessible to all Londoners.” (page 48)</i> Prevention and Protection are demonstrative of an inclusive workforce and will continue to support plans as set out within CRMP (Culture section) and address concerns contained within HMICFRS 2021/22. See Appendix 3 and Appendix 4 which show the demographic of both Prevention and Protection and LFB as a whole. As you will note, for the appendices Prevention and Protection are representative of London across the board and in some areas (gender, BAME and LGBT), proportionally the representation is greater than LFB as a whole. This is not to say that more work is not needed to allow the teams to become more representative of London as a whole, proportionally.</p>
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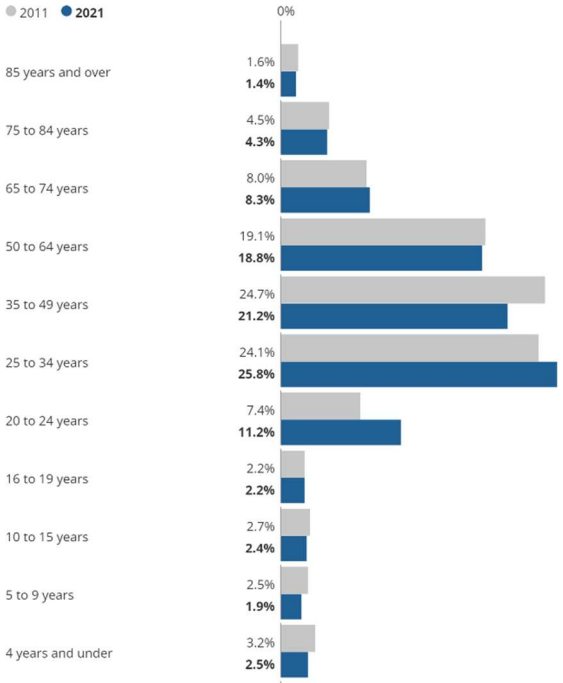
4. Wellbeing considerations

How will this piece of work impact the physical and mental wellbeing of staff and communities in London?	Please see Section 3 above and the ‘London Community’ sections within ‘Assessing Equality Impacts’ section 5 of this EIA.
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NOTE There is no Appendix 1 nor Appendix 2

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)	Neutral	<p>This proposal, including suggested MRS and abatement is not related to age. Any uplift will be entirely based upon role undertaken.</p> <p>Recruitment of new staff, as detailed within the proposal would be subject to its own EIA or fall within an existing strategy/policy and its associated EIA. These policies/strategies should take into consideration all of the protected characteristics as detailed within the Equality act 2010.</p> <p>With the current cost of living crisis and the rise in state pension age (currently set at 66 years old for both men and women but is set to gradually increase again from May 2026 for those born after April 1960), based upon the economic labour market official statistics, there has been a gradual increase in the age at which both men and women</p>	<p>LFB Equality Data April 2023 (Appendix 4)</p> <p>Prevention and Protection Equality Data 2023 (Appendix 3)</p> <p>City of London Age related data – Office of National Statistics</p>

		<p>stop working. By providing a competitive salary the Brigade are affording older people the opportunity to continue within a role, benefitting their economic circumstances and equally as important, utilising an invaluable skillset beneficial to both the Brigade and the communities we serve. https://www.gov.uk/government/statistics/economic-labour-market-status-of-individuals-aged-50-and-over-trends-over-time-september-2022/economic-labour-market-status-of-individuals-aged-50-and-over-trends-over-time-september-2022#average-age-of-exit-from-the-labour-market</p> <p>Staff</p> <p>This proposal in relation to recruitment of new personal will be subject to its own EIA or fall within a strategy/policy and its associated EIA already in existence.</p> <p>Prevention and Protection is made up of both FRS and Operational personal with 80.99% being FRS. When looking at the age range of both Operational and FRS staff within Prevention and Protection the majority fall between the ages of 40-49, representing 21.35%. There is a smaller percentage of staff falling within the age ranges of 60-64 and 65+. Those falling within age ranges, 60-64 and 65+, combined represent 10.68% of Prevention and Protection.</p> <p>*When comparing these figures to LFB age specific related data, Prevention and Protection make up 6.90% of the workforce and 24.70% of all staff within the combined 60-64 and 65+ age ranges</p> <p>* For comparison, data excludes Control Staff as there are no staff within Control working within Prevention and Protection.</p> <p>Community</p> <p>The proposal poses no direct link to impact (negative/positive) upon the community of London in terms of age. However, all community engagement conversations indicate that communities engage 'differently' with people they identify with (age, gender, ethnicity). LFB are committed to encouraging a more diverse workforce, which includes age. This in turn should lead to a more positive experience by those meeting members of the Protection Team.</p>	
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		<p>Percentage of usual residents by age group, City of London</p> <p>● 2011 ● 2021</p>  <table><thead><tr><th>Age Group</th><th>2011 (%)</th><th>2021 (%)</th></tr></thead><tbody><tr><td>85 years and over</td><td>1.6%</td><td>1.4%</td></tr><tr><td>75 to 84 years</td><td>4.5%</td><td>4.3%</td></tr><tr><td>65 to 74 years</td><td>8.0%</td><td>8.3%</td></tr><tr><td>50 to 64 years</td><td>19.1%</td><td>18.8%</td></tr><tr><td>35 to 49 years</td><td>24.7%</td><td>21.2%</td></tr><tr><td>25 to 34 years</td><td>24.1%</td><td>25.8%</td></tr><tr><td>20 to 24 years</td><td>7.4%</td><td>11.2%</td></tr><tr><td>16 to 19 years</td><td>2.2%</td><td>2.2%</td></tr><tr><td>10 to 15 years</td><td>2.7%</td><td>2.4%</td></tr><tr><td>5 to 9 years</td><td>2.5%</td><td>1.9%</td></tr><tr><td>4 years and under</td><td>3.2%</td><td>2.5%</td></tr></tbody></table> <p>Source: Office for National Statistics – 2011 Census and Census 2021</p> <p>From Appendix 3 and the data above, you will note that within many of the age categories (some of which combined in order to be comparable with age ranges shown within Prevention and Protection data), Prevention and Protection are, relatively, proportionate, with the community of London, albeit there is still some work to be done.</p>	Age Group	2011 (%)	2021 (%)	85 years and over	1.6%	1.4%	75 to 84 years	4.5%	4.3%	65 to 74 years	8.0%	8.3%	50 to 64 years	19.1%	18.8%	35 to 49 years	24.7%	21.2%	25 to 34 years	24.1%	25.8%	20 to 24 years	7.4%	11.2%	16 to 19 years	2.2%	2.2%	10 to 15 years	2.7%	2.4%	5 to 9 years	2.5%	1.9%	4 years and under	3.2%	2.5%	
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10 to 15 years	2.7%	2.4%																																					
5 to 9 years	2.5%	1.9%																																					
4 years and under	3.2%	2.5%																																					
Disability (physical, sensory, mental health, learning disability, long term illness, hidden)	Neutral	<p>This proposal, including suggested MRS and abatement is not related to disability. Any uplift will be entirely based upon role undertaken.</p> <p>Staff</p> <p>Recruitment of new staff, as detailed within the proposal would be subject to its own EIA or fall within an existing strategy/policy and its associated EIA. These policies/strategies</p>	LFB Equality Data April 2023 (Appendix 4)																																				

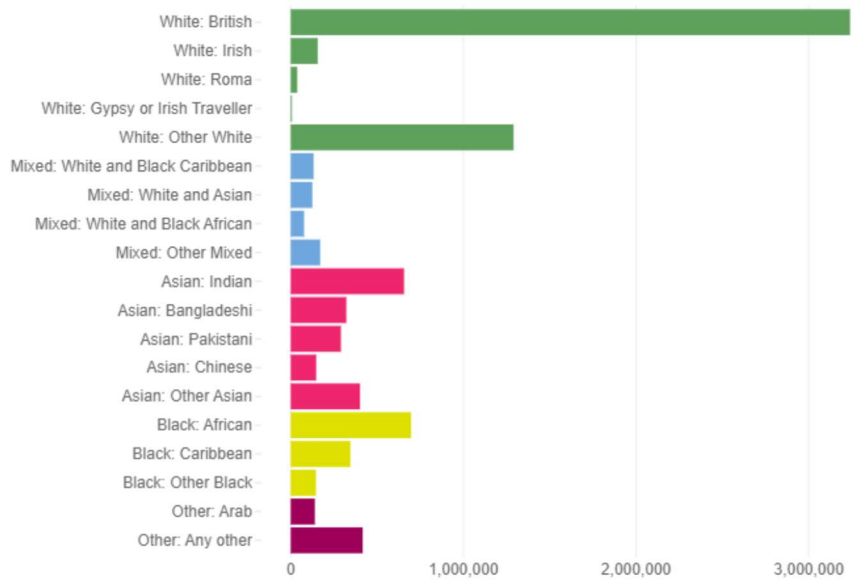
		<p>should take into consideration all of the protected characteristics as detailed within the Equality act 2010.</p> <p>*Across FRS staff groups 121 people have identified as having a disability. Across operational staff groups 337 people have identified as having a disability. The total equates to 8.21% of the workforce.</p> <p>The current demographic within Protection and Prevention, in relation to disability is 13.80%. Again this data, proportionally exceeds the proportionate rate (%) across the FRS and operational staff groups as a whole (excluding control).</p> <p>* For comparison, figures do not include Control Staff as they are not included in the Prevention and Protection data.</p> <p>The independent Culture Review stated that at 5 August 2022, 506 members of staff had diagnosed with a neurodiverse condition and known to learning support, with a further 128 members of staff awaiting their diagnostic assessment of neurodiversity screening. Neurodiversity is only one of the many physical, mental and learning disabilities in addition to other long term and hidden illnesses disclosed by staff. All staff within Prevention and Protection have access to learning support and with the support of relevant ESG's are able to navigate the support tools available to enable them to reach their full potential. The relevant ESG's are also on hand to support with teaching how to use adaptive technology such as Read&Write Gold.</p> <p>London Community</p> <p>According to the Office of National Statistics, at the time of the 2021 National census 15.7% (1.2 million) people within London answered "yes" to the question "Do you have any physical or mental health conditions or illnesses lasting or expected to last 12 months or more?" The prevalence of disability rises with age.</p>	<p>Prevention and Protection Equality Data 2023 (Appendix 3)</p> <p>Office of National Statistics disability data https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandwellbeing/bulletins/disabilityenglandandwales/census2021#:~:text=In%202021%2C%20the%20North%20East,lowest%20proportions%20of%20disabled%20people.</p>
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Gender reassignment (someone proposing to/undergoing/ undergone a transition from one gender to another)	Neutral	<p>This proposal, including suggested MRS and abatement is not related to gender reassignment. Any uplift will be entirely based upon role undertaken.</p> <p>Staff Recruitment of new staff, as detailed within the proposal would be subject to its own EIA or fall within an existing strategy/policy and its associated EIA. These policies/strategies should take into consideration all of the protected characteristics as detailed within the Equality act 2010.</p> <p>The current demographic within Protection and Prevention, in relation to gender reassignment is unknown as this information is treated as confidential until such time as a staff member chooses to share this information.</p> <p>London Community The Stonewall ‘LGBT in Britain, Trans Report’ published in 2018 it is understood that many transgender people are reticent about interacting with organisations in a number of situations, due to the discrimination and abuse that they experience in day-to-day life.</p> <p>When engaging the LGBTQ+ community we will work with and be guided by LFB LGBT Equality Support Group Secretary, Chair and wider networks to ensure inclusive language and behaviours.</p>	<p>LFB does not, currently, collect data on gender reassignment.</p> <p>Stonewall report https://www.stonewall.org.uk/system/files/lgbt_in_britain_-_trans_report_final.pdf</p>
Marriage / Civil Partnership (married as well as same-sex couples)	Neutral	<p>This proposal, including suggested MRS and abatement is not related to marital/civil partnership status. Any uplift will be entirely based upon role undertaken.</p>	<p>LFB does not, currently, collate data in relation to marriage/civil partnership.</p>
Pregnancy and Maternity	Neutral	<p>This proposal, including suggested MRS and abatement is not related to pregnancy and maternity. Any uplift will be entirely based upon role undertaken.</p> <p>Staff</p>	<p>LFB does not, currently, collate specific data on pregnancy and maternity.</p>

		<p>The proposal and working with staff either pregnant or falling within the maternity guidance set out in policy would be subject to the same guidance within policies :</p> <p>0555b Maternity, maternity support and adoption provisions, including maternity and adoption support leave and shared parental leave - uniformed staff https://londonfire.sharepoint.com/sites/BWD/_layouts/15/viewer.aspx?sourcedoc={54b0dfe1-e6f7-4f89-b7b7-bb53f3a4d38a}</p> <p>0555a Maternity support and adoption provisions – FRS and Control staff https://londonfire.sharepoint.com/sites/BWD/_layouts/15/viewer.aspx?sourcedoc={95845138-4e40-4ade-b556-d12ef72baebf}</p> <p>0135 maternity provisions health and safety arrangements – pregnant staff and maternity returnees https://londonfire.sharepoint.com/sites/BWD/_layouts/15/viewer.aspx?sourcedoc={0014a212-dbbc-4be9-b4cd-61f5cbec9e7a}</p> <p>These policies will be looked at in conjunction with any other policy, guidance notes as highlighted by appropriate ESG's and union representative bodies.</p> <p>London Community</p> <p>According to London Datastore, data collated by Office of National statistics, since 2001, the number of live births being recorded in London has changed from 104,162 to 110,944 births per year. The proportion of births which were to mothers who had been born outside the UK has changed from 43% in 2001 to 57% in the most recent year (2021).</p> <p>In 2021, the region of origin which supplied the largest number of births to non-UK-born mothers in London was Asia with 21,394, followed by the Post-2004 EU accession countries which provided 11,090. The region of origin which has seen the largest change since 2001 is the Post-2004 EU accession countries, which went from 1,612 live births per year in 2001 to 11,090 in 2021.</p>	<p>Birth data from London Datastore https://data.london.gov.uk/dataset/births-by-mothers-country-of-birth-in-london#:~:text=Since%202001%2C%20the%20number%20of%20most%20recent%20year%20(2021)</p>
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		<p>Number of live births in London by mother's place of birth, 2001-onwards</p> <p>Chart: GLA City Intelligence Source: ONS Births by parents' country of births statistics</p> <p>The data is based on births and not based on single pregnancy.</p> <p>Multiple births currently account for approximately 3% of all live births. (<i>University College London Hospital</i>) and therefore affects the data above.</p> <p>When engaging with the London community the demographics of those pregnant will need to be considered as the data shows changes in birth origin of those pregnant and with this may come language and/or cultural differences that may affect the way pregnant people interact with service providers. This can be explored in conjunction with addressing race, religion and belief as Protected Characteristics within this EIA.</p>	
Race (including nationality, colour, national and/or ethnic origins)	Neutral	<p>This proposal, including suggested MRS and abatement is not related to race. Any uplift will be entirely based upon role undertaken.</p> <p>Recruitment of new staff, as detailed within the proposal would be subject to its own EIA or fall within a strategy/policy and its associated EIA already in existence. These</p>	<p>LFB Ethnicity Data (Appendix 4)</p> <p>Prevention and Protection Data (Appendix 3)</p>

	<p>policies/strategies should take into consideration all the protected characteristics as detailed within the Equality act 2010.</p> <p>Staff</p> <p>According LFB ethnicity data 30/4/2023, 24.48% of Prevention and Protection staff are from a BAME background. This is in comparison to *17.09% of overall LFB staff teams/directorates, including Prevention and Protection, who identify as coming from a BAME background.</p> <p>* For comparison, figures do not include Control Staff as they are not included in the Prevention and Protection data. Overall figures also include those who have either ticked 'prefer not to say' or fall within the 'not known' category due to omission of selection.</p> <p>With over 300 languages spoken within London and over 40% of Londoners describing themselves as Black, Asian or from other ethnically diverse communities (CRMP 2023-2029), it is important that those from ethnically diverse backgrounds and/or those with English as a second language, future recruitment activities are targeted towards areas shown as being ethnically diverse, using for reference www.ons.gov.uk www.data.gov.uk www.gov.uk alongside working with LFB Outreach and Community engagement Team.</p> <p>As mentioned within both the HMIFRS 2021/22 and Independent Culture Review, a commitment to recognise and develop, underrepresented groups within LFB are needed. When developing the Prevention and Protection Teams, working with both B&EMM and Fairness is recommended to support the recommendations within both the aforementioned reports. (B&EMM Secretary comment May 2023)</p> <p>London Community</p> <p>At the 2021 census, London had a population of 8,799,720. Around 37% of the population were born outside the UK. The attached visual demonstrates the change in London diversity over the years up to and including the 2021 census data.https://en.wikipedia.org/wiki/File:London_ethnic_demographics_from_1961_to_2021.gif</p>	<p>London Data Store for Census data https://data.london.gov.uk/dataset/ethnic-groups-borough</p>
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		 <p>London population by ethnic group – census 2021</p>	
Religion or Belief (people of any religion, or no religion, or people who follow a particular belief (not political))	Neutral	<p>This proposal, including suggested MRS and abatement is not related to a person’s religion or religious belief. Any uplift will be entirely based upon role undertaken.</p> <p>Staff Recruitment of new staff, as detailed within the proposal would be subject to its own EIA or fall within a strategy/policy and its associated EIA already in existence. These policies/strategies should take into consideration all of the protected characteristics as detailed within the Equality act 2010.</p>	<p>LFB Equality Data April 2023 (Appendix 4)</p> <p>Prevention and Protection Equality Data 2023 (Appendix 3)</p> <p>London Datastore for census data</p>

	<p>All Staff groups within Prevention and Protection have access to either a dedicated prayer room or quiet room for prayer within LFB's 102 fire stations, head office, Control and other satellite sites.</p> <p>Uniform (both workwear and PPE) are worn for customer facing roles within Prevention and Protection. Any additional or adaptation to uniform items to allow personal to adhere to religious/cultural belief will be discussed on a case-by-case basis with line management, in conjunction with policy 320 – Wearing of uniform and personal appearance. The same will apply to any PPE to be worn.</p> <p>LFB does not record data on religion or religious belief. However, with staff across all work groups identifying as Arab, Asian, Bangladeshi, Black (including Caribbean, African, mixed and other), Chinese, Indian, Latin American, Mixed, Pakistani and White (including British, Gypsy/Irish traveller, Irish, mixed and other) it is a fair assumption that the Brigade is made up of personnel with various religions/religious beliefs.</p> <p>London Community See above (Race). When addressing any racial disparity, religion and religious belief will be considered within the same piece of work contained within out race equality work.</p> <p>According to Office of National Statistics London remains the most religiously diverse region of England in 2021, with over a quarter (25.3%) of all usual residents reporting a religion other than "Christian"; the North East and South West are the least religiously diverse regions, with 4.2% and 3.2%, respectively, selecting a religion other than "Christian".^{29 Nov 2022}</p> <p>Working with community groups, faith leaders and any other appropriate subject matter specialists respecting a person's religion/religious belief will be one of the deciding factors in how we communicate and engage with the London community, this includes respecting religious holidays/customs/traditions.</p>	<p>https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/religion/bulletins/religionenglandandwales/census2021#:~:text=London%20remains%20the%20most%20religiously,religion%20other%20than%20%E2%80%9CChristian%E2%80%9D</p>
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		The Inter Faith Network produces an annual calendar of religious festivals/dates celebrated within the UK. They are also a source for information when referencing may faiths. https://www.interfaith.org.uk/resources/religious-festivals	
Sex (men and women)	Neutral	<p>This proposal, including suggested MRS and abatement is not related to a person's sex. Any uplift will be entirely based upon role undertaken.</p> <p>It is, however, recognised that the abatement, at this time is likely to positively impact more male operational personnel than female operational personal due to the current breakdown of operational staff (men and women). This however will only impact those currently subjected to the 1992 and 2006 LFB pension schemes.</p> <p>Staff Of the 384 members of staff working within Prevention and Protection 141 are female and 243 are male (36.72% female/63.28% male). *Across the general workforce 17.12% are female and 82.88% are male.</p> <p>*For comparison these figures do not include Control as Control data is not included with Prevention and Protection data.</p> <p>Within the proposal we are not targeting specific people based upon sex. However, in relation to sex, we recognise the England and Wales demographic and the London demographic, according to national census data showing an almost 50/50 in terms of male and female breakdown. LFB recognises the need to have a workforce representative of the community it serves and as such Prevention and Protection are committed to further diversifying its staff by working with Outreach, Community Engagement and partners to identify additional ways to attracting more females. We are also committed to working with appropriate ESG's to help identify both female FRS and female operational staff who may not have considered a role within Prevention and Protection however may be well suited. We will also work with ESG's and rep bodies to identify, adapt and overcome any barriers that female members of staff may be facing preventing them from applying for positions within Prevention and Protection.</p>	<p>LFB Equality Data April 2023 (Appendix 4)</p> <p>Prevention and Protection Equality Data 2023 (Appendix 3)</p> <p>London Datastore Office of National Statistics https://data.london.gov.uk/dataset/london-s-diverse-population-</p>

London Community

According to the Office of National Statistics on census day 2021 there were 30,420,100 women (51.0% of the overall population) and 29,177,200 men (49.0%) in England and Wales. It is worth noting that the census allowed for only two options male or female. The most densely populated local authorities across England and Wales were all London boroughs, with Tower Hamlets (15,695 residents per square kilometre), Islington (14,578 residents per square kilometre) and Hackney (13,611 residents per square kilometre)

London's population by gender

	Number (thousands)
Total	9106
Gender	
Male	4554
Female	4552

Office of National Statistics 2019

The proposed strategy does not seek to target individuals based on sex. Our interaction with the public is based upon Prevention and Protection needs. However as highlighted within the Independent Culture Review and, to a lesser degree, within the HMICFRS 2021/22 there is a need to promote trust within the community when providing a service to women.

The recent high-profile cases of misogyny, rape and murder, some of which perpetrated by people in positions of trust and the inappropriate behaviours towards women

		<p>reported within the Cultural Review and UK HMICFRS reports, requires LFB to look at the way we engage with women and rebuild community trust.</p> <p>We will work with our appropriate ESG groups, Community Engagement and target women's groups with our Borough Risk Management Plan work to identify how best to engage with those feeling vulnerable by the actions recently publicised.</p>	
Sexual Orientation (straight, bi, gay and lesbian people)	Neutral	<p>This proposal, including suggested MRS and abatement is not related to sexual orientation. Any uplift will be entirely based upon role undertaken.</p> <p>LFB currently collect data which records number of staff who identify as lesbian, gay or bi-sexual (LGB). The data shows that 5.98% of all staff identify as LGB</p> <p>Recruitment of new staff, as detailed within the proposal would be subject to its own EIA or fall within a strategy/policy and its associated EIA already in existence. These policies/strategies should take into consideration all of the protected characteristics as detailed within the Equality act 2010.</p>	<p>LFB Equality Data April 2023 (Appendix 4)</p> <p>Prevention and Protection Equality Data 2023 (Appendix 3)</p>

6. Impacts outside the Equality Act 2010

What other groups might be affected by this policy, project, decision or activity?

The proposal associated with this EIA, including suggested MRS and abatement entirely based upon role undertaken. There is no anticipated negative impact on any staff group within LFB. Any identified personal need i.e. caring responsibilities, neurodiversity, non-binary recognition will be discussed and supported on an individual basis, utilising LFB policy, specific group support (internal and external) and any other identified support mechanisms.

By removing the negative pay barrier and therefore being in the position to recruit and retain sufficient staff, data should show a reduction in work related stresses, increase in productivity (benefitting the community), and an increase in retention.

7. Legal duties under the Public Sector Equality Duty (s149 Equality Act 2010)	
How does this work help LFB to:	
Eliminate discrimination?	<p>LFB recognises that there is some disparity in relation to provision and delivery within society across many services, some born out of discriminatory practices. The Protection Staff Retention paper and the recommended uplift in pay contained within that paper, is solely based upon the role undertaken and not in relation to any characteristic.</p> <p>Because of an uplift of pay, it is likely that new personnel will be recruited. At this time the Prevention and Protection teams will work with LFB recruitment teams and any external recruitment teams to ensure that any adverting and subsequent interview process is fair and demonstrates equitable treatment. This may include, but not limited to – a diverse interview panel, targeted recruitment and working with ESG's to ensure that language is inclusive, and all are given levelling opportunity to apply and demonstrate their knowledge and commitment at interview stage.</p>
Advance equality of opportunity between different groups?	<p>The Protection Staff Retention paper and the recommended uplift in pay contained within that paper, is solely based upon the role undertaken and not in relation to any characteristic outside of skillset. With the proposed uplift in pay and based upon the current 21% under establishment within the Protection team (technical qualified staff with a minimum of a Level 4 Fire safety Diploma), recruitment of new personnel will be required.</p> <p>LFB have an Outreach Team who focus on reaching underrepresented groups within the community. The Prevention and Protection Team will work closely with the Outreach Team to ensure that along with targeting potential firefighters, there will be an opportunity for members of the public to gather information about other potential vacancies within LFB. This will include Fire safety vacancies. This will be a separate piece of work outside of the Protection Staff Retention paper.</p>
Foster good relations between different groups?	<p>The Prevention and Protection Teams welcome the opportunity to work with all ESG's, Community Engagement Teams, BC's/StnC's and fire stations in a bid to create a space filled with</p>

	<p>knowledge about the work the Prevention and Protection teams undertake. We also welcome the opportunity to attend ESG meetings and specific equality group meetings (i.e B&EMM, DWG, Fairness, LGBTQ+, WAC, WFS,) in order to promote vacancies and gain an understanding of any barriers that we may not be aware of, that may prevent positive interaction with the team or members of the public we engage with.</p> <p>Our teams have Away Days and other team meetings/events, to which we will invite relevant representative bodies/groups to share their experiences and knowledge pertaining to their membership.</p>
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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
NONE LISTED		

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)	Karen Bell		Date	June 2023
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:	

Appendix 3 Prevention and Protection LFB Data based on staff numbers as at 30/04/23.

AGE GROUP																	
Occupational Group	Total	Under 20		20-29		30-39		40-49		50-54		55-59		60-64		65+	
		Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%
FRS Staff	311	1	0.32%	63	20.26%	74	23.79%	54	17.36%	36	11.58%	43	13.83%	27	8.68%	13	4.18%
Operational Staff	73	0	0.00%	0	0.00%	4	5.48%	28	38.36%	28	38.36%	12	16.44%	1	1.37%	0	0.00%
Total	384	1	0.26%	63	16.41%	78	20.31%	82	21.35%	64	16.67%	55	14.32%	28	7.29%	13	3.39%

		Gender		Ethnicity						Sexuality						Disability			
Occupational Group	Total	Female		BAME		Prefer not to say		Not Known		LGB		Prefer not to say		Not Provided		Yes		Prefer not to say	
		Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%
FRS Staff	311	134	43.09%	85	27.33%	2	0.64%	16	5.14%	18	5.79%	5	1.61%	57	18.33%	43	13.83%	3	0.96%
Operational Staff	73	7	9.59%	9	12.33%	0	0.00%	2	2.74%	1	1.37%	2	2.74%	18	24.66%	10	13.70%	2	2.74%
Total	384	141	36.72%	94	24.48%	2	0.52%	18	4.69%	19	4.95%	7	1.82%	75	19.53%	53	13.80%	5	1.30%

Religion																					
Occupational Group	Total	Buddhist		Christian		Hindu		Jewish		Muslim		Other		Sikh		No Religion		Prefer not to say		Not Provided	
		Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%
FRS Staff	311	2	0.64%	120	38.59%	8	2.57%	2	0.64%	13	4.18%	6	1.93%	4	1.29%	108	34.73%	11	3.54%	37	11.90%
Operational Staff	73	4	5.48%	28	38.36%	0	0.00%	0	0.00%	0	0.00%	2	2.74%	0	0.00%	25	34.25%	0	0.00%	14	19.18%
Total	384	6	1.56%	148	38.54%	8	2.08%	2	0.52%	13	3.39%	8	2.08%	4	1.04%	133	34.64%	11	2.86%	51	13.28%

Appendix 4 LFB Data based on staff numbers as at 30/04/23

	AGE GROUP																
Occupational Group	Total	Under 20		20-29		30-39		40-49		50-54		55-59		60-64		65+	
		Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%
Control Staff	109	0	0.00%	18	16.51%	29	26.61%	23	21.10%	12	11.01%	15	13.76%	10	9.17%	2	1.83%
FRS Staff	935	1	0.11%	123	13.16%	198	21.18%	207	22.14%	121	12.94%	152	16.26%	95	10.16%	38	4.06%
Operational Staff	4632	5	0.11%	495	10.69%	1406	30.35%	1822	39.34%	700	15.11%	171	3.69%	28	0.60%	5	0.11%
Total	5676	6	0.11%	636	11.21%	1633	28.77%	2052	36.15%	833	14.68%	338	5.95%	133	2.34%	45	0.79%

Equalities Summary as at 30/04/2023

		Female	Male	White	BAME	Not Provided	Prefer not to say	Disabled	LGB	Total
FRS Staff	Number	479	456	612	278	40	5	116	57	935
	%	51.23%	48.77%	65.45%	29.73%	4.28%	0.53%	12.41%	6.10%	
Control Staff	Number	83	26	87	19	3	0	11	9	109
	%	76.15%	23.85%	79.82%	17.43%	2.75%	0.00%	10.09%	8.26%	
Operational Staff	Number	474	4158	3767	708	122	35	339	276	4632
	%	10.23%	89.77%	81.33%	15.28%	2.63%	0.76%	7.32%	5.96%	
Total	Number	1036	4640	4466	1005	165	40	466	342	5676
	%	18.25%	81.75%	78.68%	17.71%	2.91%	0.70%	8.21%	6.03%	

Business Case

Proposal/Project Name:

P&P Staff Retention

Completed By:

Pam Oparaocha

Proposal Project Sponsor:

Charlie Pugsley

Directorate/Department:

Document Version History		
Version Number	Date	Summary of Changes

Distribution List		
Name	Title/Role	Issue Date

Approvals		
Name	Title/Role	Approval Date

1 Executive Summary

The London Fire Brigade (LFB) is competing in a market for skilled staff that has seen salaries increase significantly over the last three years. This has impacted our retention and competency rates across Prevention and Protection (P&P) as staff are lured away by salaries up to 40% higher than offered in LFB. This business case details several interventions that will seek to reduce the flow of skilled technical staff from Prevention and Protection.

1.1 Overview

Fire Safety (England) Regulations 2022 came into effect on 23 January 2023 and introduced new duties to improve fire safety in residential blocks of flats. The revised Risk Based Inspection Program will begin in April this year. Both these significant pieces of work will impact the type of work and workloads of skilled fire safety professionals across the country and specifically within the Fire and Rescue Service (FRS). Because of the complexity of London's real estate workers in London are finding their skills in high demand in the private and public sector.

The national Fire and Rescue Service, Local Authorities and private construction and building firms nationally are all competing for skilled staff to support them through the changes in legislation and their new responsibilities under the Building Safety Act 2022. The drive to improve safety and competency among building control professionals is one of the key functions of the Building Safety Regulator, placing greater demands on the market for building and fire safety professionals.

The impact on the London Fire Brigade has been significant because of the number of staff needed to meet these new demands. As an enforcing body LFB is expected to recruit 46 new Inspecting Officers to support the work of the Building Safety Regulator. To achieve this LFB must recruit circa 100 Fire Safety Advisors. This is in addition to recruiting against the current number of vacancies we are running with for Fire Safety Advisors, Inspecting Officers and Fire Engineers, noting that the current vacancy gap is circa 50 members of staff,

1.2 Summary of Recommendation

The recommendations for consideration are as follows:

- i Pending the outcome of the FRS pay review, the London Fire Commissioner approves the payment of a market rate supplement to skilled qualified staff working in Prevention and Protection (with specific accredited technical qualifications – minimum Fire Safety Level 4 Diploma) for a trial three-year period, from within the existing budget envelope, held against the existing vacancy margin and or the department underspend for 2022/23.
- ii The LFC approves a request to ringfence the department underspend for 2022/23 (circa £1.3 million) to pay the Market Rate Supplement Cost (MRS) (and abatement costs if necessary). To be kept as a non- consolidated payment and reviewed at the end of the spending review and the FRS Pay Review.

1.3 Costs and Benefits

- i. Recommendations i) and ii) would be cost-neutral.
- ii. The cost of the Market Rate Supplement would be absorbed within the existing budget and held against current vacancy margins. The number of P&P staff affected by abatement rules is low and will remain low since these rules only apply to staff on the 1992 and 2006 Fire Fighters Pension Schemes.

- iii. Total predicted cost of a Market Rate Supplement for skilled staff and Managers is approximately £850,000 per annum against a department salary underspend of £1.3 million.
- iv. One of the main benefits of the MRS would be to make the LFB more attractive as an employer. Although LFB is unlikely to be able to match salaries in the private sector it offers a range of measures that the private sector does not. The Centre for Learning and Excellence where new FSAs are coached and mentored through a standard setting development program. LFB also offers a range of fire safety qualifications up to a level 7 diploma and a fire engineering degree and opportunity to work alongside experienced specialists from enforcement, heritage teams and transport teams.
- v. The department review significantly increased the size of the delivery teams in the North and South areas to enable the setting up of teams to manage the Building Risk Review, High Risk Premises Teams and the Risk Based Inspection Program project. To support this a new structure was implemented that gave Team Leaders additional support – every team now has allocation for a team leader and two deputy team leaders. The Deputy Team Leader (DTL) role does not have its own grade making it a difficult role to fill. Staff currently receive a special responsibility allowance (SRA) which is currently not pensionable. We currently have 5 DTL vacancies across both areas. Giving the role its own pay band and permanent position in the department structure is likely to make the post more attractive to staff.

Role	Establishment	Unit Cost	Current	Unit Cost	Unit Cost Difference
FRS D - Fire Safety Inspectors/Deputy team Leaders	149	£8,161,794	109	£5,970,708	£2,191,086
FRS E - Competent Fire Safety Managers/Team Leaders	28	£1,708,170	25	£1,525,152	£183,018
FRS F - Managers/Team Leaders	3	£228,130	3	£228,130	£0
FRS E - Fire Engineers	11	£671,067	7	£427,043	£244,024
FRS G - Senior Fire Engineers	3	£291,216	3	£291,216	£0
*Fire Safety Advisors	53	n/a	49	n/a	n/a
*Engineer Technicians	5	n/a	5	n/a	n/a
Total	252	£11,060,377	201	£8,442,249	£2,618,128

NB. Salaries estimated at midpoint of salary range (01/04/2023)

Total salary cost of staff eligible for MRS is £8,442,249. Cost of MRS positioned at 10% would be £844,224 - in year one the desire would be to offset the cost. The department underspend is £1,341,742.

2 Strategic alignment and scope

2.1 Project Objectives

With over half of the entire national risk in terms of high-rise residential buildings (HRRBs) being in London, and the continued loss of competent fire safety staff to external market pressures, the challenges faced by LFB are further exacerbated. LFB have seen a circa 50% drop in the competency rate in inspecting officers (those who are fully qualified and have gained experience) in just 12 months¹ and even with active recruitment, this needs to be considered with the approximate development time of circa 2½ years to bring a new officer up to a sufficient competency level so that they can inspect HRRBs and 4-5 years to achieve competent fire engineer status.

Fire Engineers, Inspecting Officers and Team Leaders play a key role in the successful application of the Fire Safety Act. As the Enforcing body the LFB needs to be positioned in such a way that it is fit to meet the demands of the BSR and the changes in Fire Safety legislation – this will not be possible with low competency rates and high vacancy margins. As LFB continues to recruit FSAs the department structure will need to adapt to provide support for new staff – more managers and a larger pool of development officers.

To prevent staff from leaving to enter the private sector or even other public sector organisations, LFB will need close the vacancy cap, retain experienced staff to support the development of new staff. The recommendations above seek to improve retention and increase competency levels in the department.

Increased competency levels translate to increased support for developing staff and a work environment where people can see their progress moving at pace. Retaining competent staff allows managers to plan for the future and create opportunities for staff to add variety to their roles.

¹ From data mid 2021 - 2022

Development versus Competent - December 2022

Role	Development	Competent
Fire Safety Inspectors/Deputy team Leaders	47	64
Competent Fire Safety Managers/Team Leaders	6	19
Managers/Team Leaders	1	2
Fire Engineers	0	7
Senior Fire Engineers	0	3
*Fire Safety Advisors	26	26
*Engineer Technicians	5	0
Total	86	121

2.2 Strategic Alignment

LFB has an obligation under the Equality Act 2010 relating to the Public Sector Equality Duty which requires LFB to advance equality of opportunity and encourage good relations between people who share protected characteristics and those who don't. LFB must commit to fair and equal pay for all their employees. Organisations that prioritise equal pay are more likely to attract top talent, experience a more positive company culture and retain their staff. LFB, through the Community Risk Management Plan, has committed to London's communities that 'it will enable our people to be the best they can be', to better serve its communities.

LFB has adopted the National Fire Chief Council (NFCC) toolkits to encourage and ensure engagement with underrepresented groups and support diversity in our recruitment practices.

2.3 Scope of Work

The current scope is to aim to retain competent staff by offering more competitive salaries, suspending abatement rules and addressing a gap in staff structure.

2.4 Outcomes

These changes will allow P&P to better plan for the future. Create a pool of skilled competent staff to support the national arm of the BSR and the NFCC. This could also have additional benefits of bringing new skilled staff into the organisation and providing development opportunities for existing staff.

Reduced requirement for future recruitment and training through better retention of staff.

2.5 Deliverables and Outputs

Deliverables include union engagement, communications activity to generate awareness of changes both internally and in our external-facing recruitment advertising. Final approval will be required from the Deputy Mayor due to cost implications.

2.6 Programme of Work and Milestones

High level milestone breakdown		
Key Milestone	Start	End
PMM Approval		
Draft report for Commissioner's Board		
Draft report for Fire & Resilience Board		
Draft report for Corporate Investment Board		
CIB and LFC sign-off		
Union and representative bodies engagement		

2.7 Related Projects and Dependencies

Not applicable.

3 Roles and Responsibilities

3.1 Project Team Roles and Responsibilities

Role	Name	Summary of Responsibilities
Project Manager	DAC Oparaocha	Take business case through governance process
Project Sponsor	AC Pugsley	First-line checks and approval
Finance Advisor	David O'Sullivan	Advice on financial viability
Legal Advisor	Hameera Darr	Advice on legal viability
Communications Advisor	N/A	Advice on and facilitation of communications strategy

3.2 Resource & Change Assessment Sheet

4 Options Analysis

4.1 Solution Requirement(s):

The key criteria are that skilled staff feel valued and earn a salary that is commensurate with their roles, technical skills and qualifications.

Options

- Do nothing and fail to manage low competency levels and fail to address the issues causing staff to leave the LFB.
- Agree a market rate supplement paid from existing budget
- Support the cost of abatement for less than 20 staff members if the Government fails to disapply current abatement rules or allow cost recovery from grant funding.
- Include a FSD+ role to support the team structure of Service Delivery. Or agree a change in the structure that reflects the current structure in Control.

4.2 Options comparison

Business Case

Indicator	MRS			Notes
Summary description of option				
Advantages	<p>Staff retention</p> <p>Reduced onboarding, training, development due to improved retention</p> <p>Improved effectiveness & efficiency</p> <p>Ability to meet CRMP commitments by having competent staff to target higher risk</p> <p>Improved ability to meet requirements of new building safety regulator</p>			
Disadvantages	<p>Measure only targeted at Protection staff – may raise RB issues</p>			
Timescale	<p>Will need approval of Deputy Mayor and budget allocation</p>			
Constraints	<p>Cost – once vacancy gap closes.</p> <p>Will need to hold vacancies to meet MRS demand</p>			
Major Risks	<p>Increased number of competent staff leaving LFB. Deputy Mayor may not approve.</p>			

5 Cost Analysis

5.1 Project Cost Analysis

Business Case

Project Cost Analysis				
Description	Market Rate Supplement			Total
Estimated cost p.a.	£850K			
Increase vs current	N/A			
Total Project Cost	£0			

5.2 On-going Annual Charges and Future Cost Analysis

The costs in the table above represent an on-going annual cost that assumes that the additional funds will be planned into future budgets. Also assumes that the department underspend for 2022/23 will be used to cover year one MRS costs.

Business Case

Benefits Category	Benefit Description	Benefit Type *	Options achievable for	Return on Investment #	Current Baseline Position	Measure of Success	Benefit owner
Future Cost Avoidance	By retaining staff through higher salaries, we avoid recruitment, training and skills loss costs	Financial			N/A	Reduction in leavers within increase in department morale	
A safer and better place to work	Improve conditions of service for under-represented employees, enhances fairness, and improves the working environment. P&P has proportionally more staff with protected characteristics than their uniformed colleagues.	Financial				Increase in staff recruitment and recruitment from fire stations – P&P will become a viable alternative career for staff that leave operations.	

6 Commercial Case (if procurement is required)

No procurement or contracts are required.

7 Recommendations

MRS, Government sanctioned disapplication of Abatement rules, change in structure to include FSD+ role in P&P Service Delivery

8 Next Step & Considerations

Due to the cost implications, this proposal will need to progress to Corporate Investment Board and Mayoral sign-off.

9 Impact Assessment Engagement

Please provide an overview of the engagement that has taken place with the following mandatory impact assessment leads and their observations on the proposals. This does not include any delivery impacts on other receivers of change.

Equalities	EIA Completed
Sustainability	
Data Protection	
Health and Safety	
Training	