

# Part 1: Equality Impact Assessment – submitter to complete.

Before carrying out an Equality Impact Assessment (EIA), you should familiarise yourself with the guidance notes (see Appendix) and our other resources located within the  $\underline{\text{EIA}}$  section on Hotwire

An EIA should be carried out whenever you are starting (or reviewing) any major new activity/programme/policy/project/strategy/campaign \*, or where you propose changes or a review of the previous one.

\*In this document, any kind of activity/programme/policy/project will be called an ACTIVITY for an easy read, while you specify the type of your event from your end.

The purpose of an EIA is to meet and justify the legal obligation required under the <u>Public Sector Equality Duty</u> (PSED), namely, the 'DUE REGARD' that documents that your activity/programme/policy will:

- 1. eliminate discrimination, harassment, and victimisation
- 2. advance equality of opportunity
- 3. foster good relations between people who share a relevant protected characteristic and people who do not share it.

In the EIA, you need to show that your activity meets the 3 conditions of the due regard, as listed above, and provide any relevant information showing that your activity caters for people with protected characteristics (where applicable), but also that it promotes equality and eliminates potential discrimination and offers additional opportunities to advance equality.

Where you identified any possible negative impacts on individuals and groups with protected characteristics, you need to complete a mitigating action plan (Section H below). After your mitigating action plan has been implemented, you need to inform the EAI Team by sending the same form again with the notification of the date when the mitigation action plan was completed.

#### A. Name, goal and the expected outcomes of the programme/activity

Senior Leadership Development Programme

The Senior Leadership Development Programme consists of a series of external speaker talks and workshops over the course of 2024 and 2025. These sessions will provide an opportunity for your development, by hearing about the lived experiences and unique perspectives of the speakers and reflecting on how this could be applied to your own place of work.



The events typically run from about 9:30 or 10am – 12pm on the first Thursday of every month and are combined with Communications TMG monthly briefings (with few exceptions).

Following April 2025, the new Senior Leadership Development Programme targeted to the Commissioner and his Chief of Staff, Directors and a select group of Heads of Service, will be launched, depending on the business case approval following the tender process. The EIA will be revised once the design is completed.

Please find attached a copy of the agenda for the programme.

## B. Reason for Equality Impact Assessment

A new activity

### C. Names of the team responsible for the programme/activity

#### Responsibility for the EIA:

Name: Aishwarya Veeravalli

Job title: Leadership Development Co-ordinator

Department: Leadership Academy

# Responsibility for the whole activity:

Name: Mary-Anne Pilkington

Job title: Head of Leadership Development/Leadership Academy

Department: Learning and Professional Development – The Leadership Academy

# **D.** Who is this activity for, who is impacted by it (all LFB staff, specific department, external communities)

- 1. The Senior Leadership Team (incorporating the Commissioner and Directors
- 2. LFB staff, specifically the Top management Group, which includes the following groups:
- Top Management Group Plus TMG A, TMG B, TMG C
- Group/Borough commanders
- Deputy Assistant Commissioners
- Assistant Commissioners
- Heads of Service
- Commissioner
- Chief of Staff

#### E. What other policies/documents are relevant to this EIA?

The following policies/documents are relevant to this EIA:



- LFB Values
- Togetherness Inclusion Policy
- Learning Support (including Workplace Passport)
- ESG Equality support groups
- Managing stress within the LFB policy

# F. Equality and diversity considerations

Describe the ways how your activity meets the conditions of the due regard of the PSED and how LFB employees and communities of London may be affected by your activity, especially those ones with protected characteristics. Explain whether your programme/activity may disproportionately affect any group named below?

### Protected characteristics Equality Act 2010:

- Age
- Disability/Barrier
- Gender and gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race including ethnicity and nationality
- Religion or belief
- S exual orientation

# Also considering:

- Caring responsibilities
- Socio-economic backgrounds

#### At the end of your explanation, please, list the sources you have used.

It is envisaged that the programme is inclusive in its approach, and will not have any direct adverse impact on LFB staff or London's communities. The Senior Leadership Development Programme **does not** lead to discrimination, harassment, victimisation, or less favourable treatment of people with protected characteristics.

#### Content:

The external speaker deliveries are planned and decided by the external speakers and are screened by the Leadership Academy to ensure that their language is inclusive and in line with the LFB Values and Togetherness Strategy.

#### Venue:

To ensure that we use a central location for the workshops and talks, the chosen venue for the TMG Development workshops are on the Ground Floor rooms at the Headquarters. In line with LFB-agreed protocols, it includes all required amenities and facilities such as gender neutral/accessible toilets, refection spaces, sufficient



ventilation, good lighting, noise levels, parking spaces, video and equipment, and central location.

Along with the joining instructions, delegates are informed about the course content and topic prior to the workshop to ensure that there are no potential surprise triggers during the workshop. They are also able to view all other invitees and attendees to ensure they feel comfortable at the event.

We anticipate no disproportionate impact and low risk to individuals with protected characteristics under the 2010 Equality Act.

#### Please see below:

- Age Low risk
- Disability/Barrier Low risk
- Gender and Gender reassignment Low risk
- Marriage and Civil Partnership Low risk
- Pregnancy and Maternity Low risk
- Race including ethnicity and nationality Low risk.
- Religion or belief Low risk
- Sexual Orientation Low risk
- Socio-economic backgrounds Low risk
- Caring responsibilities Low risk

Data for the assessment was taken from latest equalities data (as of March 2024):

- Disability

	Disability
FRS	130 (13% of FRS)
Control	15 (13% of Control)
Operational	360 (8% of Operational)
Total	505 (9% of LFB)

#### - Gender:

	Female	Male
FRS	517 (51% of FRS)	496 (49% of FRS)
Control	87 (75% of Control)	29 (25% of Control)
Operational	485 (10% of Operational)	4209 (90% of
		Operational)
Total	1089 (19% of LFB)	4734 (78% of LFB)

#### - Race:

	White	Underrepresen	Not Provided	Prefer not to say
		ted ethnic		
		group		



FRS	650 (64% of FRS)	310 (31% of FRS)	48 (5% of FRS)	5 (.5% of FRS)
Control	90 (78% of Control)	24 (21% of Control)	2 (2% of Control)	0 (0% of Control)
Operationa	715 (15% of	715 (15% of	134 (3% of	47 (1% of
1	Operational)	Operational)	Operational)	Operational)
Total	4538 (78%	1049 (18% of	184 (3% of	52 (1% of LFB)
	of LFB)	LFB)	LFB)	

#### - Sexual Orientation - LGB

	LGB
FRS	71 (7% of FRS)
Control	10 (9% of Control)
Operational	272 (6% of Operational)
Total	353 (9% of LFB)

# G. Evidencing Impact

Please answer the following four questions:

#### G1.

- a. List all the internal/external stakeholders and organisations you have consulted or contacted regarding your activity, along with the insights gained from these interactions?
- b. Explain how you have gained and evaluated your insights and whether you intend to conduct a follow-up or seek post-activity feedback from those stakeholders?

a.

An external consultancy worked with the TMG to identify and report on the development needs of this cohort. This was done in conjunction with feedback from the staff survey, Culture Review, HMICFRS consultation and CRMP. The outcomes from the report have formed the basis of the specification for the business case for the senior leadership development programme.

The Inclusion Team are members of the TMG Working Group that reviewed and agreed the specification of the programme. The TMG Working Group have been invited to review and comment on the draft business case for the senior leadership development programme. The TMG Working Group will monitor the development and impact of the senior leadership development programme.

Due to delays in defining the specifications for the senior leadership development programme, the engagement with the Unions and the ESGs are scheduled to take place.

b.



Gained insights through the external consultation – Deeds and Words report, which was created through consultation with TMG.

The report on the development needs of the TMG cohort has been evaluated and formed the basis for defining the specification for the senior leadership development programme. An evaluation process (Kirkpatrick evaluation process) will be launched in conjunction with the senior leadership development programme roll-out. Post Activity feedback will be in the form of Kirkpatrick L1,2,3 and 4, including focus groups and reflective sessions post external speakers' inputs.

The evaluation feedback will be used to review the programme and its impact on developing the effectiveness of the senior leadership team against the expected outcomes and staff survey feedback.

G2. Have you faced any gaps in evidence for assessing your activity's impact, and if so, can you justify proceeding with the EIA without addressing them or are you considering a mitigation action plan?

No, we have faced no gaps and were able to fully assess and capture the impact of the Senior Leadership Development Programme on the attendees, both with and without protected characteristics.

G3. What adjustments have you considered for people with protected characteristics, and how does your activity promote equality of opportunity and caters for equity for them?

We anticipate that there will be no disproportionate impact on staff with protected characteristics due to sufficient adjustments made to accommodate each member of staff across the London Fire Brigade.

We recognise that there might be a disparity in the age and gender of those in TMG/senior leadership positions. To tackle this and promote equality of opportunity, we invite FRS Gs, Group and Borough commanders, and Senior control commanders to the workshops and talks as well. This will help provide them with a bespoke development opportunity, prior to them acting up/being in development.

Disability/Barrier – All venues are thoroughly vetted to ensure they are accessible for staff with disabilities. The content has been designed to include sufficient graphics, visual cues, aid memoirs, and less text to support different learning styles and speeds, in line with LFB requirements.

• For internal deliveries, the slides have been adapted to ensure accessibility and inclusivity for neurodivergent members of staff. The formats have been adapted – including colour schemes, visual aids (such as flowcharts and



diagrams), font sizes, or other design elements have been used to ease learning.

Gender and Gender reassignment – The sessions use inclusive language while delivering and avoid unnecessary 'gendered' terms in content and communication to ensure no member of staff feels excluded (binary, non-binary, and trans people).

- The venue for the sessions accessible toilets that are gender neutral and can be accessed by delegates.
- The speakers and facilitators have been requested to use gender neutral terms and avoid gendered terms and phrases such as 'ladies and gentlemen' or 'boys and girls' or 'fireman' to avoid bias. The same is ensured in all programme content. Accordingly, speakers and facilitators will challenge inappropriate and non-inclusive language.

Marriage and Civil Partnership – Workshop content and delivery will apply equally to all staff members we engage with regardless of their marital or civil partner status. Through the use and promotion of inclusive language and inclusive leadership, there is a positive impact on this group.

Pregnancy and Maternity – The programme is modular by design and has been scheduled into the diaries at the beginning of the year. This promotes flexibility and accommodates different timings for childcare responsibilities. Moreover, the talks and workshops are standalone, meaning that there is no need to attend these sessions in any particular order.

Race including ethnicity and nationality – All eligible members of staff from all ethnicities, races, and nationalities and invited to attend the workshop.

Religion or belief – The LFB headquarters has multiple quiet spaces for reflection, to support individuals with religious requirements.

Sexual Orientation – As above, the senior leadership development speakers and workshop facilitators only use inclusive language throughout to prevent any form of bias or discrimination.

Socio-economic backgrounds – As above, the workshops and talks run centrally (at Union Street/Headquarters) to provide easy access to individuals across all 4 areas of London.

Caring responsibilities – The workshops have a late start and early finish as they run from 9:30 or 10AM – 12PM, which provides ample time for childcare responsibilities in the morning/afternoon. Delegates are given notice very far in



advance to allow for alternative commitments and additional responsibilities, which may require cancellation.

G4. How do you communicate the activity to those involved, especially with protected characteristics, and have you considered diverse formats such as audio, large print, easy read, and other accessibility options in various materials?

The senior leaders eligible for the workshops and talks are emailed ahead of time, and their executive assistants are informed as well.

Prior to the event, all elected delegates are offered the opportunity to share their any and all specific requirements, wellbeing requirements, and disabilities they need support with.

Delegates are also welcome to share their Workplace Assessment Passport with further details on any requirements they would like to share for a set-time period.

The slides of the workshops and external speaker talks are reviewed by a Leadership Academy team member to ensure that they are suitable to the LFB neurodiversity format requirements and standards, <u>as described in this link</u>. In case they are not, the slides will be adapted to ensure accessibility and inclusivity for neurodivergent members of staff. This means, the formats will be adapted, including the colour schemes, visual aids (flowcharts, diagrams, etc.), font sizes, and other design elements that can ease learning.

In the case of reported neurodiversity, hard copies of appropriate formats will also be provided so delegates can read the slides and handouts. Similarly, the pace will be adapted (slowed down) to enable reading, and each slide will include sufficient visual cues without too much text.

H. Mitigating action plan (where an adverse impact has been identified, please record the steps that are being taken to mitigate or justify it?)

Protected characteristic and potential adverse impact	Lead person/department responsible for the mitigating action
1.	
2.	



3.				
4.				
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I. Signed by the Sub	mitter			
Name: Mary-Anne Pilkington				
Rank/Grade: FRS G				
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<b>Date:</b> 21st May 2024	<b>Date:</b> 21st May 2024			
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# Part 2: Inclusion team to complete - feedback and recommendations

#### J. EIA Outcomes

Select one of the four options below to indicate next steps:

**Recommendation 1:** No change required – the assessment showed that the activity is/will be robust.

#### K. Feedback

Please specify the actions required to implement the findings of this EIA and how the programme/activity's equality impact will be monitored in the future. It may be helpful to complete the table.

Recommendation 1: No changes are required, as the assessment indicates that the activity is robust.

For the Senior Leadership Development Programme, the EIA led to Recommendation 1, suggesting that no changes are necessary due to the anticipated robustness of the activity. This activity is notable for its comprehensive consideration of diverse colleagues, reflecting a strong commitment to operational effectiveness. It greatly promotes compliance with the Equality Act 2010 and demonstrates due regard for the Public Sector Equality Duty (PSED).

For future EIA submission:

Utilise HotWire resources library for Equality, Diversity, and Inclusion updates. This repository provides valuable information on data and supporting charities.

Link: Equality, Diversity and Inclusion Resources

# L. Sign off by EIA Inclusion team

Date: 13/06/2024