

Business Case

Proposal/Project Name:

Strategic Leadership Development Programme
(to be delivered as part of the Leadership Model of Trust Project)

Completed By:

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Proposal Project Sponsor:

Keeley Foster

Directorate/Department:

Learning and Professional Development

Document Version History

Version Number	Date	Summary of Changes
V1	27.06.24	Presented to IFB
V2	21.07.24	Changes made following feedback at IFB and from Directors – Fiona Dolman and Mostaque Ahmed. Addressed cost considerations and more clarification of numbers of leaders that would take part in the programme.
V3	02.08.24	Changes made by Jerry Kirkby following information from Mary-Anne Pilkington regarding option 3 (in-house provision option)

Distribution List

Name	Title/Role	Issue Date
Keeley Foster	Leadership Model of Trust project Sponsor	
TMG Working Group	Mary-Anne Pilkington (Chair & head of Leadership Academy) Keeley Foster (L&PD) Adrian Bevan (H&S) Susan Ellison-Bunce (CRMP) Nadia Bob-Thomas (Inclusion & Wellbeing) David Ollerhead (Head of Portfolio) Joanne Smith (Control) Andy Pennick (Area DAC) Nathan Hobson (Leadership Academy) Maria Buck Jackie O'Shea (Comms) Emma Ford Darren McLatchey (Area DAC) David Rowell (Procurement) Pamela Oparaocha (DAC) Penny Mitchel (Comms) Andrew Beasley (GCD) Lewis Coakley	

1 Executive Summary

In early 2023 the Brigade commissioned leadership consultants to work with the Commissioner, Directors and members of the Top Management Group (TMG) to assess the future requirements for the most senior leaders of LFB. The assessment concluded that although there were some generic leadership programmes, there was little development activity targeted at Directors or TMG. Those consulted expressed the current leadership development provision at this level was disjointed, provided on an ad-hoc basis and with little evidence of positive impact at team or organisational level.

The review found it was vital for greater clarity about the composition of TMG, finding the current number of approx. 70 members to be too large. They proposed changing the name to Strategic or Senior Leadership Team (SLT) and reducing the size. They found leaders needed greater understanding of their collective and wider organisational responsibilities beyond their specific remit or job role. There was a need to establish three different leadership communities (Commissioner, Directors and TMG/SLT) to learn and lead together. The current provision emphasised individual leadership and whilst this is useful, further development provision should be focused on cultivating a collective leadership approach with leaders collaborating to lead LFB.

Following this work LFB established a Working Group consisting of 12 TMG members from operational, control and FRS groups and colleagues from the Culture Transformation programme team and the Leadership Academy. The group developed the specification of the proposed development programme and supporting business case. This sets out two options for delivering a Strategic Leadership Development programme, as well as a third option of 'do nothing'. Directors have reviewed the options in relation to the composition of a newly formed SLT and are proposing reducing the number to approx. 40 members. Work is still ongoing to finalise this element but this should not impact on the approval process.

TMG will remain an important leadership group. The current monthly briefings and leadership development opportunities will continue. TMG members will continue to be invited to the keynote speaker sessions introduced in 2023 and will be able to access the coaching and mentoring support available from both LFB and external organisations. The learning and development provision through the Windsor Leadership programme is open to all TMG members. Investment is being made in the provision of management training and bespoke learning and development aimed at FRS staff which all TMG FRS staff will be able to access.

The recommended option is to procure an external provider to design and deliver the programme. LFB do not have the skills and resources to design and deliver this type of training, and should an in-house option be required then investment would be needed in year one to develop this capability and this would potentially involve delays. The management of the delivery of an external sourced provision would be undertaken by the Leadership Academy and be overseen through the Leadership Model of Trust project which sits in the Culture Transformation programme. Funding has been allocated in the 2024/25 budget and permission is sought to proceed to tender via an approved framework of suppliers.

1.1 Overview

Since 2017 LFB has needed to respond to unprecedented challenges both operationally and culturally. The Grenfell Tower Inquiry, the independent Culture Review and a number of reports from His Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) identified the need for the Brigade to develop leadership that could be trusted, both by the public we serve and the staff who work for LFB. The LFB Staff Survey results reinforced the need to improve leadership and the way senior colleagues behave and lead the Brigade.

Up to 2022 there had been limited leadership learning and development within LFB. The priority had been operational training. In 2022 the Brigade launched three leadership programmes aimed at junior and middle to senior leaders. The courses are being delivered by Babcock, LFB's training provider, and the Leadership Academy with some specialist support for Equality, Diversity and Inclusion modules. These are currently being delivered with evaluation showing positive impact.

In early 2023 the Brigade commissioned leadership consultants to work with the Commissioner, Directors and members of the Top Management Group (TMG) to assess the future requirements for the most senior leaders of LFB. They conducted six half day workshops and one-to-one meetings and coaching sessions with the Commissioner and all Directors. In addition, they held two full day workshops with members of the TMG exploring themes around cultural leadership and their future needs and requirements. Between the two TMG sessions, those who attended the workshops spoke to all of their TMG colleagues to gather feedback on existing and future development needs and how best to bring about culture transformation. The consultants also reviewed existing materials, resources and the programmes to support the leadership development of Directors and TMG.

The assessment concluded that although there were some generic leadership programmes, there was little development activity targeted at Directors or TMG. Those consulted expressed the current leadership development provision at this level was disjointed, provided on an ad-hoc basis and with little evidence of positive impact at team or organisational level. The reviews found it was vital for greater clarity about the composition of TMG, finding the current number of approx. 70 members to be too large. They proposed changing the name to Strategic Leadership Team (SLT) and reducing the size. They found leaders needed greater understanding of their collective and wider organisational responsibilities beyond their specific remit or job role. There was a need to establish three different leadership communities (Commissioner, Directors and TMG/SLT) to learn and lead together. The current provision emphasised individual leadership and whilst this is useful, further development provision should be focused on cultivating a collective leadership approach with leaders collaborating to lead LFB.

Following this work LFB established a Working Group consisting of 12 TMG members from operational, control and FRS groups and colleagues from the Culture Transformation programme team and the Leadership Academy. The group developed the specification of the proposed

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development programme and supporting business case. This sets out two options for delivering a Strategic Leadership Development programme, as well as a third option of 'do nothing'. Directors have reviewed the options in relation to the composition of a newly formed SLT and propose reducing the number to approx. 40 members.

TMG will remain an important leadership group. The current monthly briefings and leadership development opportunities will continue. TMG members will continue to be invited to the keynote speaker sessions introduced in 2023 and will be able to access the coaching and mentoring support available from both LFB and other organisations such as the National Fire Chiefs Council, Greater London Authority and Westminster Industry Group. In addition, the learning and development provision through the Windsor Leadership programme is open to all TMG members. Investment is being made in the provision of management training and bespoke learning and development aimed at FRS staff which all TMG FRS staff will be able to access.

The recommended option is to procure an external provider to design and deliver the programme. LFB do not have the skills and resources to design and deliver this type of training, and should an in-house option be required then investment would be needed in year one to develop this capability and this would likely involve delays. The management of the delivery of an external sourced provision would be undertaken by the Leadership Academy and be overseen through the Leadership Model of Trust project which sits in the Culture Transformation programme. Funding has been allocated in the 2024/25 budget and permission is sought to proceed to tender via an approved framework of suppliers.

There is a clear opportunity over the next 2 to 3 years to strengthen the collective leadership function of the Brigade. This business case sets out how the Brigade can work towards achieving this through the delivery of a 'Strategic Leadership Development Programme'. The below sets out the intended aims, objectives and outcomes for this development programme:

Aims:

- Strengthen relationships within the Strategic Leadership Team, driving active collaboration and cooperation.
- Build strong and accountable leadership communities across the Brigade.
- Build leadership skills and explore and understand how they are different to management skills.
- Actively consider and support succession planning.
- Help resolve complex problems and evolve working cultures, together.

Objectives:

- To embed constructive disagreement, negotiation and informed decision-making into collective leadership practice across the London Fire Brigade
- To strengthen relationships within the Strategic Leadership Team, empowering groups to collaborate more effectively, demonstrate consistency in behaviours, values and vision as a means of driving organisational effectiveness.



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- To work collaboratively to build a better understanding of, and shared confidence in the multiple leadership roles and responsibilities across the LFB.
- To develop sustainable mechanisms, such as evaluation processes, workshop storyboards, governance processes and clear objectives, for building skills, knowledge and experience of collective leadership in a complex organisation in a constantly changing environment.
- For future staff surveys to measure positive change in leadership and management and in understanding and being motivated by the senior leader's communication of their vision for LFB.
- To build a collective and collaborative strategic leadership group with a consistent style of behaviours that demonstrate the LFB Values leading to increased psychological safety and resultant improvement in wellbeing and performance.
- Personalised development, specific training needs (including support for those that are neurodiverse), objective setting, and peer to peer learning.

Outcomes:

- A strengthened collective leadership function with a clear sense of shared purpose as to their roles and responsibility as a strategic leadership team.
- A new set of relationships based on mutual trust and respect where individuals feel a strong sense of belonging and where diverse perspectives are encouraged.
- A leadership culture which creates the right conditions for healthy challenge, appropriate risk-taking and collaboration.
- A culture of on-going learning, where the leadership community take responsibility for empowering others across the Brigade. A clear sense of succession planning opportunities within LFB.
- Increased creativity and innovation across the leadership community, driving effectiveness.

2 Strategic Alignment and Scope

2.1 Project Objectives

The key objectives of the Strategic Leadership Development Programme are covered above.

2.2 Strategic Alignment

The delivery of a Strategic Leadership Development Programme aligns with the Community Risk Management Plan and the outcome sought as part of the Culture Transformation programme.

2.3 Scope of Work

The aims, objectives and outcomes of the Strategic leadership Development Programme will be delivered through four priority areas of work.

The Scope of work (Table 1) and Out of Scope work (Table 2) are set out below:

Table 1: Scope of work

Scope of work: Four Priorities	Detail
1. Building mutual trust and respect, and healthy challenge	<p>Small group coaching – Commissioner and Directors; between Directors:</p> <ul style="list-style-type: none"> • Create sufficient psychological safety to explore what ways of working are serving the Brigade well and should continue, and what is getting in the way and creating risk; • Schedule of facilitated ‘Strategic Leadership Conversations’ (over a period of 18-24months) - group coaching and consultancy sessions with different configurations of Directors and the Commissioner; • Defined roles, responsibilities and expectations for senior leaders; • Co-produce practical and innovative solutions for ways of working going forward.

<p>2. Strengthening collective leadership and shared purpose</p>	<p>Sessions with the Commissioner, and Directors, building skills and confidence around collective leadership and cultivating collective resilience:</p> <ul style="list-style-type: none"> • Schedule of ongoing facilitated coaching and consultancy sessions with Directors and the Commissioner' • Mixture of facilitation, new ideas and approaches and appropriate to promote senior leaders 'learn as they go'; • Selection of coaching models, co-coaching and tools to support senior leaders explore different ways of working; • Facilitated monthly group meetings.
<p>3. Enabling collaboration across three leadership communities</p>	<p>A parallel programme of work with members of the Strategic Leadership Team with additional mechanisms to support collaboration with the Directors and Commissioner. Building skills and confidence around leadership, increasing creativity and innovation and increasing understanding of both leadership and management:</p> <ul style="list-style-type: none"> • Bespoke interventions that provide on-going opportunities for The Strategic Leadership Team to work collaboratively to develop their skills and capabilities (key area of work: 2 Strengthening collective leadership and shared purpose); • Schedule of facilitated coaching and consultancy sessions with senior leaders to develop their collective leadership capabilities, build mutual trust and respect across the group, and equip the group to play a more active role in the leadership of the Brigade; • Models and tools to facilitate the Strategic leadership team identify succession planning opportunities, and what further individual development might be necessary to support this.
<p>4. Collaboration</p>	<p>Designed opportunities to bring the three leadership communities, within the Strategic Leadership Team, together, building relationships and strengthening capabilities:</p>

	<ul style="list-style-type: none"> • Identification and delivery of ad hoc opportunities for collaboration to strengthen our identity as a collective leadership community • Defined 'Next Steps' for leadership development; • Strategy/plan for ongoing implementation of Strategic leader development programme; • Leadership Conference for the Strategic Leadership Team.
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Table 2: Out of Scope work

Out of Scope	Detail
Other existing leadership development programmes (e.g. Frank Bailey, Gillian Tanner, Colin Townsley, and the e-learning from the NFCC)	These leadership programmes, for the whole organisation, are being delivered through the Leadership Academy, the NFCC E-Learning package and external providers
Continuous professional development	This is a separate workstream under the Competency frameworks and Appraisal Conversations within the Leadership Model of Trust within the Cultural Transformation Programme.
Performance management	This is part of the Appraisal Conversations - a separate workstream under the Leadership Model of Trust project within the Culture Transformation Programme.
Windsor Leadership programme	Delivered by an external organisation – a range of residential programmes to suit senior leaders, from different organisations, to focus on their self-development and self-awareness as part of their career development paths.
360 Feedback	This will be a separate workstream under the Leadership Model of Trust project – within the Cultural Transformation Programme and the guidance of the NFCC recommendations for 360s.
Appraisal conversations	Appraisal conversations are a workstream under the Leadership Model of Trust project within the Cultural Transformation Programme.

Leading strategic change	A one-off course for senior managers on leading strategic change. This will be managed by the Leadership Academy in collaboration with the Transformation Department
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It is envisaged that the aims and objectives of the Strategic Leadership Development Programme will be achieved through a mix of group specific work, coaching and consultancy delivered under four key areas of work. The below provides greater detail on the specification and the four key work areas.

However, if the recommended outsourcing option (Option 1) is approved, it is expected that any prospective provider will devise their own methods and approaches to achieving the desired aims and outcomes of the development programme, from which the Brigade can select the most appropriate and preferred options as part of the tender process.

Scope of Work – Four priorities

Priority 1 - Building mutual trust and respect, and healthy challenge.

The Commissioner had to act quickly and decisively to respond to the requests and criticisms from a range of external partners. The Directors have had to navigate those pressures as well as continuing the day-to-day business of running the Brigade.

This has led to shifting roles, remits and responsibilities with inevitable overlaps occurring between the Commissioner and the Directors. At times, this has served the Brigade by carrying it through the pressures faced. On other occasions, it has created risks and challenges.

As the Brigade moves from crisis to steady state, there is an opportunity to reset the relationships across the senior team. This should include establishing the boundaries of roles, gaining shared understanding about where responsibilities lie and agree clear expectations about what it means to be at leader at the LFB. These conversations will provide an opportunity to define the role of the Strategic Leadership Team over the next 18-24 months. Clarifying our approach in this way will do some of the work to increase our collective capability and build mutual trust and respect.

LFB are looking for a partner who can build trust with Directors and the Commissioner and can create sufficient psychological safety for all parties to be able to explore what ways of working are serving the Brigade well and should continue, and what is getting in the way and creating risk.

The partner should have extensive experience of working with small groups to build mutual trust and respect, foster a culture of healthy challenge, and be able to co-produce practical and innovative ways of working going forward.

LFB anticipate that any partner will provide small group coaching and consultancy with different configurations of Directors, the Commissioner.

Priority 2 - Strengthening collective leadership and shared purpose.

As the Strategic Leadership Team gain greater clarity about roles and responsibilities, there will be a need to put those new ways of working into practice. LFB are looking for a partner to work with the Commissioner and Directors on an on-going basis, to help develop collective leadership approaches to tricky problems that we are facing as a leadership community.

LFB would expect a partner to work with us on an on-going collaborative basis, providing a mixture of facilitation, new ideas and approaches, and appropriate challenge, to help us 'learn as we go'. This might include co-coaching models and tools to help us explore different ways of working and we would expect to meet as a group monthly, with facilitated support.

Priority 3 - Enabling collaboration across the Strategic Leadership Team

LFB has a strong management team underneath the Directors. The Heads of Service and other senior leaders have an assigned leadership role and play a crucial role in the leadership of the LFB. LFB are now looking to invest in a bespoke intervention to support a Strategic Leadership Team (incorporating the Commissioner and Directors). This will include explicit, on-going opportunities to work collaboratively with Directors and the Commissioner, with expected overlaps in the work programme with the Directors (priority 2).

LFB are seeking a partner who can support the Strategic Leadership Team to develop their collective leadership capabilities, build mutual trust and respect across the group, and equip the group to play a more active role in the leadership of the Brigade. This work will also support LFB to identify succession planning opportunities, and what further individual development might be necessary to support this.

LFB anticipate that work with Directors will include working with representatives of the strategic leadership team to co-design interventions, establish the best way of delivering those interventions, and measuring impact. LFB would expect any partner to proactively identify opportunities for collaboration with the Directors group and the Commissioner and his team. The aim is to strengthen the collective capability of the senior staff at the Brigade, via a mix of group specific work, coaching and consultancy.

Priority 4 - Collaboration

LFB want to strengthen the identity as a collective Strategic Leadership Team as well as providing ad hoc opportunities for collaboration. LFB are seeking a partner to run a Leadership Conference for the Strategic Leadership Team. The internal conference will



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provide an opportunity for the Strategic Leadership Team to demonstrate their increased leadership capability, explore areas of mutual interest and concern – actively cultivating a mix of minds and inclusion of diverse perspectives – as a means of driving effectiveness at the LFB.

The conference will take place at the end of the leadership development programme, and LFB are seeking a partner who will support the group to both define the next stage of their development and take responsibility for its on-going implementation.

2.4 Measurement

Work is in progress to provide a robust measurement framework for the proposed programme. It is likely to include the following:

- Robust evaluation and assurance processes to measure the impact and sustainability of all development interventions implemented. The evaluation process will be managed in collaboration with the Leadership Academy and the Evaluation Team. The Kirkpatrick Model levels 1 – 4 will be applied. This evaluation process includes feedback sheets, questionnaires and focus groups to enable mixed modes of feedback. In addition, direct feedback to the Leadership Academy will be considered as part of the evaluation process. Quality assurance and governance across delivery modes will be managed by the Leadership Academy. Innovative approaches to the measurement of impact are welcomed.
- A robust process of measuring the impact of the programme through staff surveys, HR data, sickness figures and engagement activities.
- Course codes to ensure that attendance is recorded on individual internal training records (ITRs).

2.5 Key Milestones

High level milestone breakdown – for recommended Option 1		
Key Milestone	Start (optional)	End
Draft business case approved by TMG Working Group	03/05/2024	10/05/2024
Consultation/Engagement with Rep Bodies and ESGs	10/05/2024	28/05/2024
Draft Business Case approved by Leadership Model of Trust Board	15/05/2024	22/05/2024
Draft Business Case approved by PMO	10/05/2024	28/05/2024
Draft Business Case approved by Change Group		04/06/2024
Final business case approved by IFB		25/07/2024
Final business case approved by CB		14/08/2024
Final business case approved by FB		27/08/2024



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Build tender and obtain approval from stakeholders	Based on approval by 03/09/2024	20/09/2024
Tender period including clarifications	3 weeks	11/10/2024
Tender evaluation and report	2 weeks	25/10/2024
Tender award and commercial negotiation	2 weeks	08/11/2024
Design and development of programme, tools and materials		Up to March 2025
Roll-out Strategic Leadership Development Programme		By April 2025

2.6 Related Projects and Dependencies

There are a number of workstreams within the Leadership Model of Trust project with dependencies. For example, the leadership visibility initiative which will define leadership expectations for our most senior leaders and the Competency Framework project is managed through the Learning & Professional Department. Development of the competency framework will provide clarity around the leadership development needs to meet the required competencies within role and for staff development plans. There are also relationships with workstreams that are within the People Services Transformation project, including ongoing work to restructure certain teams. Both of the projects are within the Culture Transformation programme and are managed and supported by one team under a programme director, SRO and appropriate governance and programme and project management processes.

3 Roles and Responsibilities

3.1 Project Team

Role	Name
Project Manager	Mary-Anne Pilkington
Project Sponsor	AC Keeley Foster
Senior User	Strategic Leadership Team
Senior Supplier	External Supplier (selected through tender process)
Project oversight, monitoring, and governance	Leadership Model of Trust Project Board and Culture Transformation Programme Board

3.2 Resource and Change Assessment

Anticipated Resource Requirements from Departments

Department (and Sub-Team, if relevant)	Level of support required and context of support (e.g. none, high, medium or low and additional relevant info)
Leadership Academy	High Manage and support development and implementation of programme. The Leadership Academy are leading on this work and have had a growth bid approved for additional staff to meet the requirement for the future rolling programme and sustainability of the Senior Leadership Development Programme. This growth bid has formed part of the Phase 2 restructure in People Services. It is anticipated that the current detached staff will apply for the substantial posts through an open and fair recruitment process.
Procurement	High Tender Process and Contract Management. A dedicated member from the Procurement Team has been assigned to support the Tender and procurement process
Heads of Service/ TMG Working Group	Medium Although an external consultancy will be designing and delivering the Strategic Leadership Development Programme, relevance and currency of the content will require input and support from senior leaders and the TMG Working Group in collaboration with the Leadership Academy and the consultants
Inclusion and Well-being	Medium Appraise content to ensure Inclusion and wellbeing strategy outcomes are met The Inclusion Team are members of the Model of Trust Project Board and the TMG Working Group that have and will continue to provide input into the development of the tender specification and leadership development programme.
Health and Safety	Medium Appraise content to ensure Health and Safety strategy outcomes are met Health and safety are members of the TMG Working Group that have and will continue to provide input into the tender specification and leadership development programme.



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L&PD Training Operations	Low Scheduling processes The scheduling team work closely with the Leadership Academy on scheduling and will be updated as the programme develops.
L&PD Evaluation Team	Medium Evaluation process – Kirkpatrick levels 1 to 4
	The evaluation team have been notified so that they can factor this into future work.
Communications	Medium Communications strategy The Communications Teams are working closely with the Leadership Academy on the current TMG+ Leadership Development and are members of the TMG Working Group and have contributed to the tender specification and will be part of the development process.
Property and TSS	Low Access to Union Street meeting rooms for regular group coaching and consultancy sessions and one-off use/hire of a large external venue for the end of programme conference. Property have been made aware of requirements of rooms and the Leadership Academy have gathered details on costings of potential external venues
Finance	High Budgetary support through governance, such as auditing, reporting etc. The Budget has been approved for this Programme.

Impact: The project will impact the following people/groups in terms of potential changes to their ways of working:

- Strategic Leadership Team
- Improvements to leadership development which will enhance ongoing professional development and lead to an enhanced employee value proposition (EVP).
- Engagement has taken place with the relevant stakeholders through senior leadership workshops run by consultants who were commissioned to conduct an analysis of how leaders are currently developed in LFB.
- The Leadership Model of Trust Project Board will provide oversight and governance for the initial design and delivery of the Strategic Leadership Development Program, either via an external provider (Option 1) or in-house via the Leadership academy (Option 3). The Leadership Academy will manage the day-to-day management of the contract should option 1 be approved.
- No initial business continuity implications have been identified, but further advice is to be sought from the Business Continuity Team.

3.3 Early Impact Assessment Engagement

Equalities	Complete
Sustainability	Complete
Data Protection	Completed
Health and Safety	N/A
Training	N/A

3.4 Procurement Requirement (if applicable)

LFB Procurement team have been engaged in developing the business case and advising on potential supply routes. Following research they propose if option 1 is chosen the procurement should be via a Public Contracts Regulation 2015 compliant framework run by YPO. This will give LFB a wide range of suppliers to review submissions from (approx. 17). This ensures a fair comparison in regards to capability/commerciality and taking into consideration our commitment for Responsible Procurement, including Sustainability, CSR and Social Value.

Procurement have proposed a Tender Panel is established to help inform the process and assess submissions. It has been agreed this will consist of the following:

- Cliff Morten, Interim Chief HR Officer
- AC Keeley Foster, Leadership Model of Trust Sponsor
- Lewis Coakley, Head of Culture and Organisation Development
- Mary-Anne Pilkington, Head of Leadership Development
- Nadia Bob-Thomas, Head of Equality, Inclusion and Diversity
- Adrian Bevan, Prospect representative

The assessment criteria will be agreed with Procurement to ensure appropriate weighting is given to the quality of the product and cost considerations.

4 Cost Analysis

Option 1 – External provider

Research has taken place on the cost associated with similar leadership development programmes. The NFCC currently offer places on an Executive Leadership Programme at a cost of £10k per delegate for a 9-12 month programme with a residential offering.

The Windsor Leadership Programme provide two courses at executive level. Both consist of a one-year programme and include two residential development sessions. The average cost is £5k per delegate.

The Metropolitan Police Service has a strategic leadership development programme delivered by an external provider. This lasts for one year and has two residential modules. The cost of this programme is approx. £12k per delegate.

As a comparator, the current middle leadership development course in LFB which consists of 5 days development with 3 days being in-person sessions and 2 days online, averages £1.2k per delegate.

For the purpose of this business case a cost of £5k per delegate per year has been applied with a £150k one-off build cost. It is anticipated that the providers on the framework will be able to build the programme at lesser cost. Although the programme has been scoped and



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costed for a 3-year period, the option of reducing this to 2 years is an option and the tender process will seek to explore this.

Option 3 In-house provision

LFB do not have the skills and resources to design and deliver this type of training, and should an in-house option be required then additional investment would be needed to develop this capability especially in year one. It will also take additional time. Below are the initial assumptions and calculations on the provision of an in-house delivered programme.

It has been assessed that two registered Occupational Psychologists would be required for two months, at the cost of £800 per day (£64,000 for two months), to help design the programme and to upskill the facilitators in the content and delivery style of the leadership development programme. The College of Policing, Transport for London and the NHS all employ/procure Occupational Psychologists to design and support their internal leadership programmes.

Existing Leadership Academy trainers/facilitators will be used to deliver this programme. It should be noted that these resources are subject to final governance approval but were contained in the agreed budget for 2024/25. A fund of £64k is proposed to cover the abstraction of these staff to be upskilled. Their core role is delivering existing and planned leadership training within LFB so there will likely be a need to temporarily cover their abstraction. At this stage it has been costed to use contract trainers for 10 days at £800 per day.

It is proposed to provide tailored learning and development opportunities to meet personal development needs, recognizing that some leaders will have completed courses or have the necessary skills. An allocation of £60k is proposed for attendance at events or courses such as CIPD conferences and workshops, Leadership College of Government masterclasses and workshops and NFCC leadership programmes and conferences. This will be allocated on a needs basis.

An in-house programme will likely need to draw on subject matter experts and speakers to deliver certain elements of the programme. For example, subjects such as emotional intelligence/resilience and decision making within strategic leadership roles, operating in a political environment, social value thinking, wellbeing and diversity, equity and inclusion for strategic leaders are likely to require subject matters expert. An allocation of £30k is proposed.

The provision of a residential course for participants is proposed which will include food and accommodation, occupational psychologist support and attendance of subject matter experts. An allocation of £80k is proposed.

Future years will involve some elements of the above, for example the residential element and use of subject matter experts and speakers.

4.1 Project Cost Analysis

The assumption of 40 delegates at a cost of £5k per delegate per year over a 2-years and 3-year period has been included.

Project Cost Analysis			
Description	Option 1 (recommended option)	Option 2 (do nothing option)	Option 3 (alternative option)
Strategic Leadership Development Programme	Procurement of an external provider to design and deliver the Strategic Leadership Development Programme via a contract tendering process.	Continued internal delivery of the existing Leadership Development Workshop and Speaker Programme via the Leadership Academy (with sourced external speakers).	In-house design and delivery of the Strategic Leadership Development Programme via the Leadership Academy.
Total Project Cost	3-years £750k 2-years £550k	Estimated at £120k over 3 years (40k pa)	3-years £600k 2-years £550k

- Option 1
 - Data available in the public domain has provided insights into the expected costs when developing comparable leadership programmes across public sector organisations – see above.
- Option 2
 - This is a known quantity taken from last financial year costs and anticipated additional costs based on feedback from TMG attendees.
 - Last financial year costings did not exceed £14k.
 - Feedback shows a need to grow this cost by bringing in more keynote speakers and finding other methods on engagement.
- Option 3
 - Covers costs for additional resources e.g. staff within the Leadership Academy and includes venue costs, tools and SME input.
 - The current skills within the Leadership Academy are unlikely to be able to meet the requirements in the expected outcomes. Developing these skills will cost money and take time.

4.2 On-going Costs (Post Project)

On-going Costs – Post Project (Add lines to table for additional years)			
	Option 1 (Recommended option)	Option 2 (do nothing)	Option 3 (alternative)
Year 1	£350k	£40k	£300k
Year 2	£200k	£40k	£150k
Year 3	£200k (if 3-year)	£40k	£150k
Total Cost	£550k (2-years) or £750k (3-years)	£120k	£450k (2-years) or £600k (3-years)

Summary of Benefits

5 Benefit Analysis

The below table provides a high-level summary of the project's main benefits.

Benefits Category	Benefit Description	Benefits Type	Options achievable for	Potential Return on Investment #
Employment	Improved senior leadership retention	Non- financial	1,3	<p>Leaders have positive learning and development experiences;</p> <p>Improved staff engagement;</p> <p>Improved reputation as an employer;</p> <p>Improved ability to attract senior leaders when vacancies arise;</p> <p>Modern styles of leadership</p> <p>Less risk of employment tribunals;</p> <p>Improved staff survey results specifically in the Leadership and Management category around senior leaders having a clear vision for LFB and communicating it in a motivational manner.</p>

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Employment	Better leadership of all staff	Non- financial	1,3	More cohesive leadership; Greater alignment to future strategic development; Better communication of strategic vision; Enhanced Psychological safety due to change in leadership style; Improved staff morale; Value from differing leadership styles in innovative and creative approaches; Greater self-awareness and impact on others; Feedback from Coaching and co coaching will inform further development.
Service Quality	Leadership developed in a manner tailored for LFB and focussed on current needs.	Non- financial	1,3	The ability to constantly evolve the content of the learning programme to meet the needs of attendees and to remain relevant; External, independent input in thought leadership and networking (Option 1); Aligned to industry recognised best practice in leadership development; Support through focussed coaching and mentoring aligns with recognised industry best practice. Monthly leadership development meetings will enhance collective leadership approach; Increased uptake of learning and continued engagement and motivation due to enhanced industry reputation.

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*Description of Benefit types:

1. **Cashable financial benefits:** These are changes that result in your organisation having more money to spend, either through savings or through additional revenue.
2. **Non-cashable financial benefits:** non-cashable benefits are changes that do not lead to an immediate benefit, but address problems e.g. a reduction in non-budgeted costs or future savings.
3. **Non- financial benefits:** non-financial benefits are those that are not, or cannot be, directly measured in terms of monetary units.

#Return on Investment (ROI): A return on investment is about measuring the efficiency or profitability of an investment and applies to cashable, non-cashable and non-financial benefits. For example:

- i. **Cashable Financial Benefit:** A project is given an investment of £123k. The project in its first year is expected to make a return of £150k. The Return on investment will be the $(\text{Return} - \text{Cost of the Investment}) * 100\%$ or $(£150k - £123k) * 100 = 27\%$. A good return is roughly above 10 – 15%. This should be done for all benefits where possible.
- ii. **Non-cashable financial benefits:** A team spends £500k/ year on renting premises. They receive funding of £1.25m to build a station with office capacity. The station takes 2 years to build. Using the formula above, the ROI for this project over 5 years from being built will be 3 years of not paying rent since it takes 2 years to build $((£500k * 3) - £1.25m) / 100\% = 20\%$
- iii. **Non-financial benefits:** A team gets funding to deliver a project that will install new computers. This is expected to improve efficiency and provide a 15% reduction in calls to the help desk. In this case, the ROI will be the same as the measure of success.

Business Case

6 Options Analysed

6.1 Options Comparison

Three options are being proposed for consideration for the provision of the Strategic Leadership Development Programme:

- **Option 1** (recommended): Procurement of an external provider to design and deliver the Strategic Leadership Development Programme.
- **Option 2** (do nothing): Continued internal delivery of the existing Leadership Development Workshop and Speaker Programme via the Leadership Academy.
- **Option 3** (alternative): In-house design and delivery of the Strategic Leadership Development Programme via the Leadership Academy.

Option 1 is the recommended option. Procuring an external service provider will deliver a flexible and adaptive programme, utilising tried and tested methods, tools approaches that can be tailored to the needs of the Strategic Leadership Team through co-design of initiatives. It will also enable the Strategic Leadership Team to receive dedicated and ongoing consultation and coaching from experienced and qualified practitioners. This option can also be implemented faster than option 3 (in-house design and delivery) as there would be no delays incurred from the additional recruitment, resourcing and upskilling of the Leadership academy that would be required.

Data is available in the public domain that suggest Option 1 would cost up to £550k for a 2-year programme and £750k for a 3-year programme.

Option 2 is not recommended. The current interim offering of a workshop and speaker programme does not go far enough to deliver the recommended leadership development interventions as identified in the initial scoping work undertaken. The commissioned report highlighted the need for an alternative method to leadership training within LFB and the need for ample opportunities to develop LFB's approach to leadership. Doing nothing is a missed opportunity and will increase the risk of LFB going back into Engage status with HMICFRS.

Option 3 is not recommended. To deliver the Strategic Leadership Development in-house would require upskilling within in the Leadership Academy. This would take time to achieve and impact on the delivery of current and planned leadership training for other staff. Delays to the delivery of the programme would be incurred because of the time required for the Leadership Academy to design the programme, develop the appropriate tools and materials, upskill facilitators and develop a robust evaluation and assurance process. Once set-up, having the Strategic Leadership Programme fully managed and delivered internally means that any changes could be made quickly and without incurring additional costs. However, the overall time constraints associated with internal delivery make this a more high-risk option regarding the negative impacts it could have on strategic leadership development and retention, and on the Brigade's reputation.



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Business Case

Indicator	Option 1 (Recommended option)	Option 2 (do nothing option)	Option 3 (alternative option)
Summary description of option	Procurement of an external provider to design and deliver the Strategic Leadership Development Programme via a contract tendering process.	Continued internal delivery of the existing Leadership Development Workshop and Speaker Programme via the Leadership Academy (with sourced external speakers).	In-house design and delivery of the Strategic Leadership Development Programme via the Leadership Academy
Advantages	<ol style="list-style-type: none">1. Tried and tested content and methods of delivery.2. No start-up costs associated.3. Outside influences that will bring fresh perspectives into LFB.4. Potential for accreditation to be incorporated as part of ongoing professional development.5. Fully optimised to what LFB's leadership needs are.6. Able to evolve and change based on feedback from attendees and new concepts on leadership from external sources of expertise without delay or cost.7. LFB retains full control over eligibility to attend, waiting times to attend, and ongoing further support.	<ol style="list-style-type: none">1. No changes required.2. No additional cost or resource requirements. <p>Is fully financially sustainable.</p>	<ol style="list-style-type: none">1. More cost effective over the longer term.2. Speed to enable changes to programmes and contact3. Reputational impact of having an internal Leadership Academy that can deliver leadership Training across all staff groups.4. Sustainable over time



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Business Case

Advantages	<ul style="list-style-type: none">8. Tried and tested content and methods of delivery.9. No start-up costs associated.10. Outside influences that will bring fresh perspectives into LFB.11. Potential for accreditation to be incorporated as part of ongoing professional development.12. Fully optimised to what LFB's leadership needs are.13. Able to evolve and change based on feedback from attendees and new concepts on leadership from external sources of expertise without delay or cost.14. LFB retains full control over eligibility to attend, waiting times to attend, and ongoing further support.	<ul style="list-style-type: none">3. No changes required.4. No additional cost or resource requirements.5. Is fully financially sustainable.	<ul style="list-style-type: none">5. More cost effective over the longer term.6. Speed to enable changes to programmes and contact7. Reputational impact of having an internal Leadership Academy that can deliver leadership Training across all staff groups.8. Sustainable over time9. Potential for income generation over the long-term
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Disadvantages

- | | | | |
|---|---|--|--|
| <div data-bbox="120 250 329 288" data-label="Section-Header"><h4>Disadvantages</h4></div> | <ol style="list-style-type: none">1. Going through a contract tendering process does not guarantee a perfect solution.2. Contract management is a specific skill and will require upskilling in this area.3. Delays and costs incurred in changing content of programme.4. Not the most cost-effective option after 3 years. | <ol style="list-style-type: none">1. Does not meet LFBs leadership development needs.2. Limited modalities used in delivering engaging material.3. Low 'buy in' from existing TMG level leaders. | <h3>Business Case</h3> <ol style="list-style-type: none">1. Delay to starting to offer this service due to recruiting designers and SMES and upskilling staff in the Leadership Academy2. New commodity which will need time to build a strong reputation.3. Additional workload for the Leadership Academy.4. Diversion of experienced trainers and facilitators from existing and planned leadership programmes.5. Potential for resistance to change which will limit effectiveness of content. |
|---|---|--|--|



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Benefits

1. This option empowers LFB to follow on from the commissioned development needs analysis and design a bespoke service offering.
2. There is the opportunity to define leadership as LFB sees it and create a leadership framework that supports its own definition.
3. The offering of a bespoke Strategic Leadership Programme gives leaders a chance to feed into the continuous professional development. This will improve leadership retention and engagement. There is also the opportunity to develop this service with inspiration from outside examples of excellence.
4. Improved leadership styles will positively impact all staff and reduce the risk of poor behaviours that result in prolonged sickness absence due to mental health or grievances resulting in employment tribunals.

1. This option provides continuity as leaders will recognise the content that is produced and shared in the workshops.
2. Keynote speakers will bring in new perspectives from outside of LFB.
3. Ongoing evaluation process

Business Case

1. More cost effective in the long run.
2. Sustainable over time.
3. Limited delay in changing content of programme as need arises
4. Ongoing evaluation process



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Business Case

5. Using tried and tested approaches means that there has already been ongoing development to make the content relevant and applicable.
6. Fresh perspectives from outside of LFB will encourage new thinking about how to lead people.
7. Ongoing evaluation process
8. Strengthen relationships across three leadership community
9. Develop a psychologically safe environment across the senior leadership building mutual trust and confidence to provide healthy challenge.
10. Clear boundaries of roles, responsibilities and expectations will be established.



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Costs	<p>1. Data available in the public domain suggests that a comparable leadership programme, compared to what LFB requires to be effective, would cost no less than £300k - £500k for design/delivery in year one and £200k p.a.</p> <p>The need for a third year will be assessed as part of the procurement process.</p>	<p>Existing costs are at £14k. However, future costs are expected to not exceed £40k.</p> <p>This is due to the need of expanding the content provided through the existing workshops and not relying on keynote speakers talking free of charge.</p>	<h3>Business Case</h3> <p>Initial start-up costs are expected to not exceed £300k in year one. This includes recruiting designers and SME to be part of the programme. Existing staff will need to be upskilled.</p> <p>Second and third year costs would be approx. £150k per year. The need for a third year will need to be assessed.</p>
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Timescale and speed to benefit	Roll-out to commence by April 2025 Within 3 months of roll-out: <ul style="list-style-type: none">• Schedule of facilitated ‘Senior Leadership Conversations’ (over a period of 18-24months) - group coaching and consultancy sessions with different configurations of Directors and the Commissioner• Defined roles, responsibilities and expectations for senior leaders• Design and implementation of robust evaluation and assurance processes to measure the impact and sustainability of all development interventions implemented. Within 6 months of roll-out <ul style="list-style-type: none">• Co-produce practical and innovative solutions for ways of working going forward.• Schedule of ongoing facilitated coaching and consultancy sessions with the Strategic Leadership Team• Schedule of facilitated coaching and consultancy sessions with the Strategic Leadership Team to develop their collective	Roll-out currently ongoing Immediate development of strategic leadership group.	Business Case Roll-out by Jan 2026 Within 6 months <ul style="list-style-type: none">• A tailored leadership framework that specifically aligns our values, standards, and expectations with the NFCC core code of ethics. Within 18 months <ul style="list-style-type: none">• Quarterly away days in neutral locations with keynote speakers aligned to a single theme for each event, and networking opportunities across departments.• Personalised, specific training needs (including support for those that are neurodiverse), objective setting, and peer to peer learning.• Action Learning Sets that are no bigger than 5 members, working across different department of LFB, meeting monthly, and facilitated by the Leadership Academy. Within 2 years <ul style="list-style-type: none">• Mandatory learning to be completed within 2 years of taking post.
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leadership capabilities, build mutual trust and respect across the group, and equip the group to play a more active role in the leadership of the Brigade.

- Range of approaches to promote senior leaders 'learn as they go'.
- Selection of coaching models and tools to support senior leaders explore different ways of working.
- Bespoke interventions that provide on-going opportunities for the Strategic Leadership Team to develop their skills and capabilities.
- Identification and delivery of ad hoc opportunities for collaboration to strengthen identity as a collective leadership community.

Within 12 months of roll-out

- Models and tools to facilitate Heads of Service identify succession planning opportunities, and what further individual development might be necessary to support this.
- Design and delivery of an internal Leadership Conference for the Senior Leadership Team to take place at the end of the leadership development programme.

Business Case

Business Case

	<ul style="list-style-type: none"> Defined 'Next Steps' for leadership development. Strategy/plan for ongoing implementation of the Strategic Leadership Development Programme 		
Constraints	<p>Accessibility for people with learning support needs.</p> <p>Levels of interest in the contract tendering process.</p>	Low levels of interest.	Capability and capacity of the Leadership Academy.
Major Risks	<p>Poorly defined specification preventing procurement of most appropriate provider.</p> <p>Limited interest from potential bidders.</p> <p>Mismanagement of the contract.</p>	<p>Leaders leaving due to limited development opportunities.</p> <p>No tangible cultural changes.</p> <p>Further investigations because of poor leadership.</p> <p>Going back into Engage status with HMICFRS</p>	<p>Taking longer to get a Leadership Programme running.</p> <p>Limited range of external perspective and input.</p> <p>No previous experience of designer or delivering leadership training and learning and development at the strategic level.</p>



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Business Case

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Application of the prioritisation framework

1. Value

There are clear drivers for this project including contributing towards Leadership Development as articulated in the CRMP, in addition to links with the Culture Review and HMI recommendations in putting trust in LFB leaders. The project is likely to start delivering benefits within 13-24 months once roll out has started.

The business case articulates the benefits around both employment (which includes retention and employee engagement), and also service quality. In both areas there will be a significant enhancement for the target group as a result of the introduction of the Leadership Development Programme.

2. Effort

Specialist resource will be needed in terms of an external supplier, and some resource will also be required from enabling services including Procurement and Communications. Input from Heads of Service will also be required. Funding has already been agreed as part of last year's budget round and specialist expertise will be procured. The impact of the work will primarily be to TMG and Heads of Service, who will be feeding into and attending the Leadership development programme. The cost of the project is anticipated to be over £500k, but there are limited dependencies and risk involved.

Once the scores and weightings were applied, the project scores 3.4 for value, and 2.9 for effort. The recommendation, as per the decision-making matrix, is therefore to proceed and balance: project should be monitored both in terms of effort and resource requirement, as it may need to be evaluated if effort levels increase and/or if value decreases.



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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 [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 [Public Sector Equality Duty](#) (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

Strategic Leadership Development Programme

The Strategic 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.



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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 Strategic 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 Strategic 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



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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
- Sexual 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 Strategic 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:



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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, refecton 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)



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- Race:				
	White	Underrepresented ethnic group	Not Provided	Prefer not to say
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)
Operational	715 (15% of Operational)	715 (15% of Operational)	134 (3% of Operational)	47 (1% of Operational)
Total	4538 (78% of LFB)	1049 (18% of LFB)	184 (3% of LFB)	52 (1% of 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 strategic 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 strategic leadership development programme. The TMG Working Group will monitor the development and impact of the strategic leadership development programme.

Due to delays in defining the specifications for the strategic 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 strategic leadership development programme. An evaluation process (Kirkpatrick evaluation process) will be launched in conjunction with the strategic 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 strategic 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 Strategic 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/ Strategic 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,



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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 strategic leadership development speakers and workshop facilitators only use inclusive language throughout to prevent any form of bias or discrimination.



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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, [as described in this link](#). 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	Action being taken to mitigate or justify	Lead person/department responsible for the mitigating action
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impact		
1.		
2.		
3.		
4.		
I. Signed by the Submitter		
Name: Mary-Anne Pilkington		
Rank/Grade: FRS G		
Date: 21 st May 2024		

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 Strategic 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

Sustainable Development Impact Assessment Checklist

Project Name/ Policy Name & No: Leadership Academy

Contact Person: Nathan Hobson

Date completed: _____

Please send through the completed checklist with a copy of the project PID or the draft policy to environment@london-fire.gov.uk. For existing policies undergoing minor amendments, please send through a marked-up copy of the policy, with the original SDIA.

Other impact assessments completed		Yes	No		
1. Has an Equalities Impact Assessment been completed?		<input checked="" type="checkbox"/>	<input type="checkbox"/>		
2. Has a Health, Safety and Wellbeing assessment been completed?		<input type="checkbox"/>	<input checked="" type="checkbox"/>		
We were informed that a HSWIA is not required for our current Leadership Academy programmes.					
Environmental Impacts					
3. Will this consume any of the following (please tick those that apply and state how and if this would increase or decrease our consumption):					
Gas	<input type="checkbox"/>	Electricity	<input checked="" type="checkbox"/>	Water	<input checked="" type="checkbox"/>
Petrol or diesel	<input checked="" type="checkbox"/>	Hazardous chemicals	<input type="checkbox"/>	Other natural resources e.g., timber	<input type="checkbox"/>
Comments:					

Due to the programmes requiring physical deliveries, both LFB staff as well as our Leadership Academy facilitators use electricity (for Electric vehicles), petrol, or diesel for travels across London. However, in the attempt to minimise pollution, the facilitators use public transport and cycle to their venues where possible.

For Colin Townsley 2 workshops, Establishment and Performance team schedule 3-4 watches with roughly 2 appliances each to attend at a centralised venue. This helps reduce electricity wastage at multiple venues as we only use one of the large display screens to display content for all watches. As the appliances need to travel to the venue, we ensure that the centralised hub/station with closest proximity to all allocated watches is selected to minimise travel distance.

Similarly, the Gillian Tanner, Frank Bailey, and training for trainers' workshops are run at centralised venues, and attendees can choose their preferred locations (in most cases), which helps reduce any additional unnecessary travel.

The coaching and mentoring and deaf awareness workshops are designed to be voluntary, where staff can opt to attend a workshop based on their preferences (timings, location, etc.). They are all held at LFB venues (either at Headquarters or area hubs) to reduce any additional or unusual impact on their workplace travel. Similar to above, as all attendees attend the session in one venue (one room), we will only use one large screen to display content, thereby significantly reducing electricity and energy consumption.

Similarly, Leadership Academy facilitators travel to individual watches to deliver LFB Values sessions to avoid any of the appliances travelling for longer periods of time for a singular workshop. This thereby minimises the use of Electricity (for electrical vehicles), Petrol, and Diesel of an entire appliance having to travel for a workshop.

The NFCC Supervisory Leadership Development Programme and Middle Leadership Programmes are run virtually, which require a certain amount of electricity to run the monitors and laptops to view the content.

With regards to Learning Support, majority of the work happens online – from email referrals, learning support authorisation forms, diagnostic screening, teams' meetings, external support interventions (GeniusWithin), workplace passports, etc. Hence, electricity will be used to work on the LFB-monitors and laptops, but will not result in any additional wastage of resources where possible.

In terms of water, we provide refreshments in most of our workshops, which requires hot water for teas, coffee, etc.

4. Will this produce or reduce our production of (please tick those that apply and describe what and how):

Non-hazardous waste	<input type="checkbox"/>	Hazardous waste (see PN 862)	<input type="checkbox"/>	pollutants to air, land, or water?	<input checked="" type="checkbox"/>
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Comments:

Our programmes produce minimal production of pollutants to air, land, or water.

The strategic resource schedule for the Colin Townsley 2 programme with about 3-4 watches per session who are allocated to attend each session. As the appliances need to travel to the venue, we ensure that the centralised hub/station with closest proximity to all allocated watches is selected to minimise travel distance.

For the Gillian Tanner, Frank Bailey, and Training for Trainers programme, staff are allocated on an individual-basis and travel to an individual venue, using their own forms of transportation or public transportation. To minimise excessive travel, all venues are selected to be central and close to Union Street headquarters, which would therefore ensure that there will be no unusual increase in production of pollutants. In addition, for Frank Bailey Leadership Programme, individuals are provided with the opportunity to choose their preferred venue which minimises excess travelling.

The Values workshops are held in their own stations for each watch and hence does not require an appliance traveling long distances to attend the session. The facilitators travelling to the watches try and use public transport and cycling where possible to avoid excessive air pollution.

Similar to the above, the coaching and mentoring workshops and deaf awareness workshops are held at centralised hubs or at Headquarters, and attendees are able to choose their preferred location for attendance. Similarly, as the TMG workshops or bespoke deliveries are held at headquarters, there will be no additional or unusual impact on workplace travel.

The learning support team deliver presentations at Barking to new trainee firefighters as part of the FFD programme. As the facilitator aims to travel using Public transportation where possible to travel to the venue, this minimises the release of pollutants to the air.

5. Will this impact (positively or negatively):	Yes	No
a. Operational/business travel by staff	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Travel/deliveries by our suppliers	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Environmental protection at incidents	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. a Site of Special Scientific Interest	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Gardens or other wildlife at stations/brigade sites (e.g., nesting birds or bats)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

The strategic resource schedule for the Colin Townsley 2 programme with about 3-4 watches per session who are allocated to attend each session. As the appliances need to travel to the venue, I have selected 'Yes' above for the operational travel by staff section.

Procurement	Yes	No
6. Will this result in the purchase of goods, services or works or influence how they are procured?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Is this for a purchase of greater than £1m?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Will this use/result in a tender for manufactured goods such as electronics, textiles, and building materials?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Will this service require low skilled/low paid employees?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. Will the goods consume utilities or consumables?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

j. Does this involve major works taking place?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
k. If so are BREEAM and Ecological surveys required?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
l. Will this support future cost avoidance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
m. Could all or part of the purchase be provided by small or local businesses?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
n. Could this be delivered by a voluntary/community sector organisation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
o. Has a Request for Tender been submitted to Procurement through hotwire?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments: NA		

For the SD Team to complete:

Policy sustainability risk rating: Low

Inputs/outputs/ impacts to address in Full SDIA: A full SDIA is not required. Date completed: 30/04/2024

Data Protection in the workplace

Data Protection Impact Assessment (DPIA)

Introduction

This DPIA template and guide is adapted from the *Information Commissioner's (ICO) code of practice for conducting privacy impact assessments*¹ and will assist managers and staff to identify and mitigate against any data protection related risks arising from a new processing system, process or technology, which may affect the Brigade or the individuals we engage with.

Background

New data protection laws came into force on 25 May 2018². These new laws expand the rights of individuals to control how their personal data is collected and processed, and places a range of new obligations on the Brigade to be more accountable for the processing of personal data. Many of the changes simply build on the data protection arrangements that have been in place since 1998.

In the course of their work, LFB staff are required to collect and use certain types of information about people, including '[personal data](#)' as defined by GDPR. This information can relate to members of the public, current, past and prospective employees, suppliers and others with whom staff communicate.

One of the new data protection requirements is the need for the Brigade to conduct a DPIA whenever there is a change that is likely to involve a new use or significantly change the way in which personal data is handled, for example a redesign of an existing process or service, or a new process or information asset being introduced. A key factor is to reduce the amount of data processed to comply with our data protection obligations and meet individuals' expectations of privacy.

What is a DPIA?

A DPIA addresses the impacts of data processing on individuals' privacy. It is the basis of a "[privacy by design](#)" approach, to help meet privacy and data protection expectations of customers, employees and other stakeholders. A DPIA is intended to be prospective and proactive and should act as an early warning system by considering privacy and compliance risks in the initial design and throughout the project.

Privacy, in its broadest sense, is about the right of an individual to be left alone. It can take two main forms, and these can be subject to different types of intrusion:

- **Physical privacy** - the ability of a person to maintain their own physical space or solitude. Intrusion can come in the form of unwelcome searches of a person's home or personal possessions, bodily searches or other interference, acts of surveillance and the taking of biometric information
- **Informational privacy** – the ability of a person to control, edit, manage and delete information about themselves and to decide how and to what extent such information is communicated to others. Intrusion can come in the form of collection of excessive

personal information, disclosure of personal information without consent and misuse of such information. It can include the collection of information through the surveillance or monitoring of how people act in public or private spaces and through the monitoring of communications whether by post, phone or online and extends to monitoring the records of senders and recipients as well as the content of messages

¹ <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/accountability-and-governance/data-protection-impact-assessments/>

² General Data Protection Regulation (GDPR) and the Data Protection Bill 2018

Who is responsible for completing a DPIA?

Completing DPIAs is the responsibility of the project manager or process owner in collaboration with Information Management Information Access Team. The finalised DPIA will be signed off by the Brigade's Data Protection Officer (David Wyatt) consulting with the relevant HoS as appropriate.

Data Protection Assessment (DPIA) Pre-screening questionnaire

Project name or details of process change	Workstreams under leadership Academy <ul style="list-style-type: none">• Coaching and Mentoring Workshops• Colin Townsley Leadership Programme• Gillian Tanner Leadership Programme• Frank Bailey Leadership Programme• NFCC Supervisory Leadership Development Programme Pilot• NFCC Middle Leadership Programme Pilot• TMG Leadership Development Programme• LFB Values workshops• Deaf Awareness workshops• Learning Support• Training for Trainers (Operational staff only)
Project manager or process owner	Mary-Anne Pilkington
Department/Team	Leadership Academy
Date	
Signature	

If the answer to any of the following questions are 'yes' you will need to complete a full DPIA.

Please keep a copy of this form with your project documentation and submit a copy to the Information Management Team at InformationAccess@london-fire.gov.uk

	Yes	No
Will the project involve the collection of new information about individuals?	Yes	
Will the project compel individuals to provide information about themselves?		No
Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?	Yes	
Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used for?		No
Does the project involve you using new technology which might be perceived as being privacy intrusive? For example, the using of biometrics or facial recognition.		No
Will the project result in you making decisions or taking action against individuals in ways which can have a significant impact on them?		No

Is the information about individuals a kind particularly likely to raise privacy concerns or expectations including special categories data? For example, health records, criminal records or other information that people would consider to be particularly private.		No
Will the project require you to contact individuals in a way which they may find intrusive?		No
Will the project introduce new facilities that might be used by individuals in the institution to gather, process, analyse or share personal information in ways that would previously have required specialist support?		No
Will the project involve the processing of personal data by third parties (third parties would include all cloud based services)?	Yes	
Will the project expose personal data to elevated levels of security risks?		No
Are stakeholders likely to have privacy concerns about the project?		No

Data Protection Assessment (DPIA) Template Full

assessment

For advice and guidance on data protection issues, contact the information access team within the information management division. This template should be completed at the start of any major project involving the use of personal data, or if you are making a significant change to an existing process. The final outcomes should be integrated back into your project plan.

Step 1: Identify the need for a DPIA.

Explain broadly what project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. Summarise why you identified the need for a DPIA. [If this template is being used for a project that is not a Brigade Project, then you should also explain here what the project aims to achieve and what the benefits will be to the organisation, to individuals and to other parties.]

The workstreams covered under the leadership academy include the following:

1. Coaching and Mentoring: The purpose of the project was/is to develop a Leadership Academy Coaching and Mentoring programme for all three staff groups. This will support the London Fire Brigades vision to be a dynamic, forward-looking organisation of fully engaged people at the centre of the communities we serve, adapting to the changing needs of London. All staff have access to the program, but particular attention is paid to groups currently underrepresented at senior ranks and grades in our organisation regarding accessibility. This has been done by working with the equality support groups, communications, and awareness raising across the brigade. This will continue going forward.
2. Colin Townsley Leadership Programme: The Colin Townsley is a set of 4 one-day workshops designed around the LFB Values, key insights, and tools around emotional intelligence, developing skills for dealing with difficult conversations, and navigating change. This is a thought-provoking programme that gives you some space for self-reflection, learning, and networking with your peers across the wider organisation.
3. Frank Bailey Leadership Programme: The purpose of this programme is to provide a leadership development programme for middle managers across all three staff groups. A five-module middle leadership programme, centered on our LFB Behaviours, designed to develop the LFB's leadership capability and support our staff to be the best leaders that they can be. We have worked with our own inclusion team as well as two external organisations (GBS and Radius Networks) to design the content around:
 - a. Leading Oneself – GBS
 - b. Leading Teams – GBS
 - c. Leading with Courage and Authenticity – Radius Networks
 - d. Leading Individuals – GBS
 - e. Influence – GBS

4. Gillian Tanner Leadership Programme:
 - a. Leading self and others with compassion – Leaders who can practise honest self- assessment, manage their emotions, and understand their impact on others.
 - b. Leading self and others through togetherness – Leaders who can practise behaviours that create a culture of inclusion, teamwork, and empowerment and coaching.
 - c. Leading self and others through accountability – Leaders who can practise accountable behaviours that create an environment where everyone feels responsible and takes ownership for their actions.
5. Middle Leadership Programme: The self-directed development programme is designed exclusively and collaboratively between the NFCC and CMI. It is a natural progression from the NFCC Supervisory Leadership Development Programme (SLDP) and offers middle leaders a wealth of support for their day-to-day leadership and management activities, along with access to materials to address ongoing development needs. The programme has been designed exclusively to develop knowledge, skills, and behaviours for every existing, new, and aspiring supervisory leader across all areas of the UK fire and rescue service, regardless of role, contract type or location.
6. Supervisory Leadership Development Programme: The Leadership Academy is piloting the SLDP to gain an indication from our staff as to the impact and suitability of the platform/content as a potential replacement for elements of the Gillian Tanner Leadership Programme.
7. Strategic Leadership Development Programme: The Strategic 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.
8. Training for Trainers: 2-day training course designed for operational staff to cover topics such as worries and challenges about presenting, preparing objectives, trainer toolkits and training methods, learning preferences and barriers to learning, evaluation of training, and structures of lesson plans. The delegates are trained in presentation techniques and assessed through a presentation on a subject of their choosing.
9. LFB values: Our values are a set of guiding principles that will help us to create a safe and professional workplace culture, and to achieve LFB's vision to be trusted to serve and protect London. The Commissioner and Directors have requested that each member of staff attends a mandatory 2.5-hour face to face workshop where you will be introduced to the new values and think about your role as an individual in bringing these to life. The workshop will provide in depth case studies that relate to all staff groups and provide a meaningful environment for discussion relating to our LFB Identity, vision, purpose, and future.
10. Learning Support: Designed to support individuals with specific learning needs, based on individual needs and evidence of learning challenges. We also make workplace adjustments to a recruitment process and to the training/ work environment/ job role to support with a specific learning difficulty in undertaking development, duties, and responsibilities.

11. Deaf Awareness Workshops: Designed to raise deaf (and hard of hearing) awareness in order to keep communities safer by allowing participants to:
 - a. Understand the range and scale of deafness.
 - b. Have exposure to lived experience of deafness to encourage compassion and empath.
 - c. Improve knowledge regards the numbers of people who are deaf /are hard of hearing.
 - d. Recognise bias and judgement regarding deafness.
 - e. Enhance knowledge of the BSL app, BSL, support agencies and legal requirements.
 - f. Learn communication tips.
 - g. Experience lip reading through practical exercises.
 - h. Have a practical introduction to basic emergency BSL signs and intro to the BSL alphabet.

The reason for completing the DPIA are three-fold:

1. The project will involve the processing of personal data by third parties (third parties would include all cloud-based services)
2. The project will involve the collection of new information about individuals.
3. The project will disclose information about individuals to organisations or people who have not previously had routine access to the information (NFCC, GLA, Genius Within, Babcock, etc.)

Step 2: Describe the processing.

Describe the nature of the processing: How will you collect, use, store and delete data? What is the source of the data? Will you be sharing data with anyone? You might find it useful to refer to a flow diagram or other way of describing data flows. What types of processing identified as likely high risk are involved?

The data will be collected in accordance with the Data Protection and Privacy Policy and the Data Protection Act 2018.

All personal data is collected in compliance with the DPA and maintained only in connection with the intended Project and shall not be transferred to any other (unverified) authority or any country or territory outside the EEA.

The data source is the HR/ People services feed as well as the StARS report, which is used to gather information about employees' name, their role, rank, title, occupational group, current location, and pay number. As majority of our courses are organised and run internally, the data that is used are the personal details that is collected and maintained by the LFB.

However, we have a few programs within the Leadership Academy where the data is shared with an external organisation:

1. Coaching and Mentoring – LFB Coaches and Mentors can sign up to be coaches or coachees on the GLA and WIG websites, which are external organisations. Their personal details (name, pay number, email, rank, title, station, and watch (location) are shared with the organisation to support with the exercise.
 - a. A few additional (optional) details are collected including occupational group, gender, ethnicity, religion, additional learning needs, and personal feedback and reflections are requested at the end of the session as an evaluation. Attendees have the choice to provide this if they feel comfortable.
2. Gillian Tanner and Frank Bailey – Similarly, details such as full name, pay number, job title and rank, station, and watch (location) are shared with Babcock, Radius, GBS, and Benchmark who handle the delivery for these courses (via Babcock). The data they collect is attendance to the course and what the course result is, this is all stored within the LMS Big learning.
3. Supervisory Leadership development programme and Middle Leadership programme – information such as their title, full name, and work email addresses is shared with the National Fire Chief's Council (NFCC) who provide these leadership programs.
4. Learning Support – Details such as Name, DOB, contact number (personal and work), Email (personal and work), home address, pay number, Job Title, Station, Watch, first day of service and backgrounds of the assessment/ screening are shared with an external provider called GeniusWithin to organise the support – coaching or screening. Their personal information is also shared internally within the brigade to support their day-to-day role in the Brigade – Purchasing, IT, and Training, HR, Health management limited (Brigade's health provided), wellbeing team (for advice).
 - a. Workplace passport: Details collected include Full name, pay number, Assessments (shared based on choosing), and Diagnosis (only shared with individual, line manager of their choice, training, and recruitment). Individuals are free to share their workplace passports across the Brigade depending on their own choosing.

Describe the scope of the processing:

What is the nature of the data, and does it include special category or criminal offence data? How much data will you be collecting and using? How often? How long will you keep it? How many individuals are affected? What geographical area does it cover?

All brigade data is in scope, and is collected daily via the Brigade's line of business systems (e.g. StARS). The Data Platform will be refreshed and updated nightly. Across our leadership programmes and workstreams, we collect both personal and special category data.

For most programmes, we collect data such as individuals' Full name, pay number, Job title, Station, and Watch in most cases, which mainly falls under the 'personal details' and 'work details' categories.

In some cases, we collect information such as Name, DOB, contact number (personal and work), Email (personal and work), home address, pay number, Job Title, Station, Watch, first day of service to provide the required support to the member of staff. This would include narrative data that we provide to external parties (e.g., information about behavioural characteristics and learning support recommendation)

In the coaching and mentoring workshops, we gather information such as religion, race, and ethnic origin in the evaluation form, to evaluate our performance in supporting individuals from underrepresented communities and with protected characteristics across the brigade. Additionally, the Learning support team also collect health information (e.g., physical, and psychological conditions), which falls under the special category data sources.

In accordance with the LFB commitment to data protection, we only keep personal data in identifiable form as long as necessary for the purposes for which it is collected, or where we have a legal obligation to do so. The people services feed that is provided to Babcock (our external training provider) is refreshed every 24 hours, therefore maintaining data integrity and authenticity. The data covers the individuals who belong to the London Fire Brigade but working with external as well as internal organisational teams.

Describe the context of the processing:

What is the nature of your relationship with the individuals? How much control will they have? Would they expect you to use their data in this way? Do they include children or other vulnerable groups? Are there prior concerns over this type of processing or security flaws? Is it novel in any way? What is the current state of technology in this area? Are there any current issues of public concern that you should factor in? Are you signed up to any approved code of conduct or certification scheme (once any have been approved)?

We have no relationship with the individuals, all of whom are Brigade employees.

For our pilot programmes with smaller attendee numbers – such as the Supervisory leadership development programme, personal details are not retrieved, to maintain anonymity of the delegates who attend the workshop. Delegates who were part of the pilot were informed that their personal data was only shared with the NFCC to ensure that they are not misled about the purposes of any processing. However, when learning support collect data from individuals seeking assistance and support with learning difficulties, they have a one-to-one with a Learning Support Advisor (LSA)

where they review personal details (physical and psychological health) and suggest the next steps – assessment or coaching.

All personal details are not newly gathered data, but existing data in the Brigade network. In instances where ‘special category data’ is requested, it is entirely optional for the delegate to share these details and a voluntary choice.

There are no concerns over the processing of this data. The LFB premises are maintained and access to buildings is restricted to ensure that all security doors are closed, and cabinets are locked. Doors and windows are always secured when the station/ building is left unattended. The visitors to the non-public areas of the Brigade are to be accompanied and signed in and out of the premises. Through this we ensure that data is collected, used, or handled in a way that is compliant with data protection law.

To minimise the risk of interception by the third parties (intentionally or otherwise), we consider the following precautions when sharing data with our third party suppliers (Babcock, Benchmark, GBS, Radius, GLA, WIG, GeniusWithin, etc.):

- 1. Is the data shared with the right recipients (YES)
- 2. Is the proposed use clearly defined and identified (YES)
- 3. Is the minimum amount of information being sent (YES)

We also ensure that we only process personal data fairly and ensure that data subjects are not misled about the purposes of any processing. We also ensure that data subjects receive full privacy information so that any processing of their personal data (with external agencies) is transparent.

Describe the purposes of the processing:

What do you want to achieve?

What is the intended effect on individuals?

What are the benefits of the processing – for you, and more broadly?

The purpose of processing data is to achieve the project objectives as outlined above, without any impact on the individuals involved.

Step 3: Consultation process

Consider how to consult with relevant stakeholders: describe when and how you will seek individuals' views – or justify why it's not appropriate to do so.

Who else do you need to involve within the Brigade? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts?

We do not seek individuals' views directly, as we are processing LFB data which is already being held. All other impact assessments have been completed and submitted to respective departments.

Step 4: Assess necessity and proportionality.

Describe compliance and proportionality measures, in particular:

What is your lawful basis for processing?

Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? How will you prevent the technology or system being beyond the purpose it was originally intended for? How will you ensure data quality and data minimisation?

What information will you give individuals? How will you help to support their rights?

What measures do you take to ensure processors comply? How do you safeguard any international transfers?

Lawful basis for processing data is to support individuals with their leadership development through the leadership programmes, and provide necessary support and adjustments to LFB employees, in line with the Neurodiversity is a disability under the Equality Act (2010).

The processing of data will allow us to achieve our objective as:

1. They allow employees to access external training and leadership programmes such as the Supervisory Leadership Development Programme and Middle Leadership Programme
2. They allow employees to access expertise from external coaches and mentors from the GLA and WIG, as well as internally within the Brigade.
3. They allow employees to engage in and learn from the experts through leadership development programmes delivered internally and through external providers.
4. They allow employees to seek and receive support for their learning challenges and workplace concerns.
5. They allow employees to explore and engage with the LFB Values which were launched Brigade- wide on the 4th of December 2023.

We will ensure data minimisation by collecting, analysing, and sharing only the required data from each individual. This is typically information that is on the LFB system and sometimes includes additional information (from the special category).

All staff are informed that their data and records will be kept on your electronic personal record file (e-PRF) and retained in accordance with Policy number 788 - Electronic personal record files (e-PRF). Personal data shall be processed in accordance with Policy number 351 – Data protection and privacy policy.

We do not have any international transfer of data.

Step 5: Identify and assess risks – measures to reduce.

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk

Controls may take many forms, such as additional terms and conditions in a contract, a privacy notice, disabling certain product features, user training, technical controls, such as encryption, produce data sharing agreements

[illegible]

Step 6: Sign off and record outcomes

Item	Name/date	Notes
Measures approved by:		Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:		If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:		DPO should advise on compliance, step 5 measures, specifically additional measures which could be applied to reduce or eliminate risks and whether processing can proceed
Summary of DPO advice:		
DPO advice accepted or overruled by:		If overruled, you must explain your reasons
Comments:		
Consultation responses reviewed by:		If your decision departs from individuals' views, you must explain your reasons
Comments:		
This DPIA will kept under review by:		The DPO should also review ongoing compliance with DPIA

