



LONDON FIRE BRIGADE

## Full Equality Impact Assessment (EIA) Form

When completing this form please use the [EIA guidance notes](#) and check our other resources on our dedicated [EIA Hotwire pages](#)

### Part one

You will only be required to complete a full EIA assessment if:

- a) as a result of completing the initial screening form, potential adverse impacts have been identified in an area of your activity requiring adjustments
- b) you are starting, reviewing or changing any major activity (e.g. a strategy, programme or campaign)

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 will:

- a) eliminate discrimination, harassment, and victimisation;
- b) advance equality of opportunity; and,
- c) foster good relations between people who share a relevant protected characteristic and people who do not share it.

In your full EIA, you are only required to complete an assessment of any negative impacts. You must be able to show that your activity meets the three conditions of the due regard by providing relevant information to show how it caters for people with protected characteristics (where applicable), through eliminating potential discrimination and promoting opportunities to build equity between all groups.

#### A. Title, status, and expected outcomes of the activity

Organisational Change proposals: July 2025

LFB is facing a budget challenge for 2025-26 and beyond. We need to make savings of £28 million and protect the Brigade's frontline by delivering our supporting services at a lower cost in the years ahead. This will ensure there is a balanced budget in line with our statutory responsibilities. To achieve this, while protecting the frontline services we provide to London, we are proposing to improve efficiency and bear down on any unnecessary spending. We are also reducing roles and functions and in the March-May 2025 consultation approximately £4m was identified for savings. The July consultation aims to identify approximately £0.7m.



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This document sets out a high-level assessment of the equalities impacts of this second tranche of organisational change proposals, due to go into consultation on 16 July 2025.

This is the Equality Impact Assessment (EIA) for proposals to remove, reduce, change and introduce new posts and structures within LFB. The proposals potentially impact a range of grades and positions in: Finance, HR Data Insights, Property & TSS, and Pre-Determined Attendance.

This assessment is intended to help decision makers consider the potential impact of organisational change on individual members of staff and the overall diversity of functions (as well as flagging any wider implications). It will also help them prepare more detailed plans to support staff through the changes and ensure that, whatever the final decision, there is no discrimination against staff in the groups outlined above.

Throughout any organisational change the Brigade will work diligently to ensure it retains a balanced and diverse workforce with the skills, competences and experience needed to achieve our CRMP objectives, and that the processes used to manage the change are in line with our LFB Values.

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

This is the EIA for proposals to remove, reduce, change and introduce new posts and structures within LFB. These changes impact a range of grades and positions in the following directorates and departments set out in section A. above. Some staff in those areas will be at risk of redundancy. Other staff will also be affected by the changes, e.g. by a change of line manager or team. This latter group includes staff in other LFB departments.

### C. Reason for Equality Impact Assessment

To understand the impact of the proposed changes in advance of any implementation, which would take place from September 2025.

### D. Team responsible for the activity

EIA Author(s):

Name: Kathryn Bloomfield  
Job title: HR Business Manager  
Department: People Services

**EIA Owner(s) - individual in charge of the overall activity:** Name: Sally Hopper  
Job title: Director for People  
Department: People Services



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**E. What other policies/documents are relevant to this EIA? (Please hyperlink each document, policy, and guideline referenced below)**

LFB Budget position:

[The Mayor's budget | London City Hall](#)

The proposed changes have been developed and presented to the Commissioner's Board and the potential associated costs have been through the GLA governance process to seek authorisation prior to commencing consultation.

Pay Gap reporting:

[LFB 2024-25 Gender pay gap report](#)

Organisational Change Consultation will take account of following policies and codes:

- [policy number 0562 - redundancy and redeployment policy \(FRS and Control staff\)](#)
- [policy number 972 Recruitment policy FRS and Control](#)
- [LFB staff code - section o - pension, retirement, redeployment and redundancy](#)
- Consultation documents, FAQs, Voluntary Redundancy Expression of Interest and Assessment Criteria, at risk letters for staff.



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### 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 activity may disproportionately affect any groups with a protected characteristic listed under the Equality Act 2010.

**You must make sure to list any sources you have used to complete your analysis.**

Do not provide databases, graphs, or tables in this section. Just key findings and the outcomes of your learning about these different groups.

#### **Protected characteristics Equality Act 2010:**

This section has been prepared using HR data available on the organisational staff profiles, and drawing on the information for each department in scope of the proposals:

##### Sex

Neither women nor men are disproportionately impacted, in comparison to total FRS workforce composition.

The FRS staff group has just over 50% female representation, which is significantly higher than the organisational staffing profile of 19%. The FRS roles typically attract higher numbers of female professionals, so this could result in more women being affected by the organisational change than men. While analysis of HR data supports the analysis above, the pay gap report does not show a particular disadvantage to this group. The initial assessment of colleagues potentially in scope of the proposed changes show that departments in scope have between 37% and 70% of those affected as female. We will however monitor the situation as it develops during consultation to provide information relating to the re-employability of this group and challenges individuals may face due to their gender.

##### Age

Staff aged 55 and over are disproportionately impacted by the proposals. 52.63% of staff in the at risk group are over the age of 55, compared with 28.3% of the FRS workforce.

It is noted that some of the change proposals include new posts, which at risk staff may wish to apply for. Eligible staff over the age of 55 who are at risk under the proposals could, if they wished, explore the option to access their pension (subject to applying and being accepted for voluntary redundancy or being affected by compulsory redundancy).



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Longer serving LFB employees (including those with transferred service for the purposes of redundancy under the modification order) will benefit from higher compensation under voluntary redundancy. Employees with long service over the age of 41 have a greater entitlement to voluntary redundancy compensation. Those in the pension scheme who are over the age of 55 are entitled to early release of benefits on redundancy and their main LGPS benefits will not be reduced for early payment. While cost is one of four criteria for agreeing applications for voluntary redundancy, the Brigade has secured agreement from the GLA for LFB to fund the pension strain. Furthermore, the cost of voluntary redundancy pensions strain decreases the closer the individual gets to pension age, and not all at-risk staff are members of the pension scheme.

It is further noted that research indicates that for staff over 50 years of age can be harder to find employment and this is why career support and advice will be key to all affected staff, but specifically those over 55 years of age. To support this attention is drawn within this EIA to <https://www.gov.uk/government/publications/help-and-support-for-older-workers/help-and-support-for-older-workers>

### Sexual orientation

Based on the data, numbers are too small to report (as may lead to identification of individuals), though across LFB, 6.8% of staff identify as LGB. Whilst the individuals identifying as LGB is too small to report, reported figures suggest this demographic is not over-represented in the at-risk group.

### Disability/Barrier

Based on the data, numbers are too small to report (as may lead to identification of individuals), however, staff who have declared a disability are not disproportionately impacted under the proposals. Reasonable adjustments remain in place, and support will be provided throughout the consultation process for staff requirements, including the provision of reasonable adjustments.

### Ethnicity

There is an over-representation of black or minority ethnic staff at risk under the proposals. 31.4% of the overall FRS workforce are from black or minority ethnic background. However, 52.63% of the at risk staff are from this demographic.

Assessment of Impact: LFB's 2022 Pay Gap report showed that staff from minority ethnic backgrounds are overrepresented across our lower paying roles throughout the organisation but especially in FRS roles, with less than 4% currently earning above £60k. The overall FRS picture will be reflected in the departments in scope. Redundancies could impact this further.



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The initial assessment of colleagues potentially in scope of the proposed changes show that between 66.67% of those affected identify as from an ethnic minority background, which skews higher than in FRS where there are around 32% of staff identifying as from an ethnic minority background.

### Religion or belief

There is an over-representation of Christian staff in the at risk group compared to the FRS workforce as a whole, 38.92% compared to 57.89% of the at risk group.

Within the overall FRS affected staff group, 39% of staff declare as Christian while a significant number of staff within the teams in scope have chosen no religion (25% to 43% across the different departments), which is in line with overall FRS at 34% for no religion. There is not over-representation for any other religious demographic in the at risk group. We will remain alert to the impact of these changes on staff through the lens of religion or belief and will keep this protected characteristic under review as the consultation progresses and the potential impact on specific groups becomes clearer.

### Marriage/Civil Partnership

It is unlikely that the organisational change programme will have a direct or indirect impact on any staff from a particular relationship status; however, this could be linked to caring responsibilities.

### Pregnancy and maternity

We have HR records of those staff in the organisation on parental related leave and will ensure we deliver on our policy and statutory responsibilities to staff in scope of the changes. At risk individuals who are pregnant or on maternity leave have a statutory entitlement to enhanced protection, which LFB will remain compliant with throughout this process.

### Gender re-assignment

We do not hold information on gender reassignment at LFB. It is unlikely that the reorganisations will have a direct or indirect negative impact on any staff falling into this category. However, if this should change, and we will remain alert to the possibility, the impact on staff falling into this category could be high. Although there is limited research on individuals transitioning in the workplace, what is available suggests challenges with issues around reskilling. This is something we will hold in mind as the consultation progresses and at the next EIA review point.

### Socio-economic backgrounds

LFB does not collect information on staff socio-economic status. However, the proposals impact staff at grades FRS B to FRS F, with the majority falling within the FRS C and FRS D grades. The largest proportion of staff potentially at risk are in the lower grades.



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### Caring Responsibilities

LFB does not routinely collect information on whether staff are carers. Having a caring responsibility is not a protected characteristic, however LFB are committed to supporting staff who care, for example through the Parents and Carers Support Network.

Note: Data sourced from LFB HR Data reports.

### G. Evidencing Impact: please answer the following:

**G1. (a)** List all stakeholders and organisations (internal/external) you have consulted or contacted regarding your activity, making sure to seek feedback from groups that may be the most impacted by the activity.

Consulted and engaged with Commissioner's Board and GLA as part of the decision-making processes. Union representatives and Employee Support Groups will be consulted on the EIA, so that feedback may be provided around the support which should be made available to impacted groups.

Staff are also encouraged to provide feedback through the consultation form available.

**(b)** Explain the insights gained, how you have/will evaluate and whether you intend to conduct a follow-up or seek post-activity feedback from those stakeholders/organisations?

We will gather views directly from staff in scope of the changes, Equality Staff Groups (ESGs) and the Unions on how proposals might affect specific groups of staff and any issues that could lead to different outcomes for people with protected characteristics and according to socio economic background. It is important to note that we may not be able to consult with all staff currently in those departments and directorates because the reorganisations differ in size and scope. We will concentrate efforts on those at risk. Through the Unions and ESGs we will ensure there is opportunity for all members to be represented in some form or another.



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<p><b>G2.</b> Clearly record any gaps in evidence which has limited this assessment being completed in full. I.e. Was there any information or data you were unable to find/collect? Consider whether you can justify continuing the activity without this information, or if a mitigating action plan is required?</p>	<p>Gaps in data have been identified in the previous section F.</p>
<p><b>G3.</b> Clearly record the following:</p> <p><b>a)</b> List any adjustments you will be putting in place for people with protected characteristics. Use each characteristic as a sub-heading, and</p> <p><b>b)</b> any activity to promote equity of access, opportunity, experience and outcomes?</p>	<p>Section G. above reiterates our commitment to gathering views directly from staff in scope of the changes, ESGs and the Unions on how proposals might affect specific groups of staff and any issues that could lead to different outcomes for people in the various diversity groups. The process with the Trade Unions began with a period of pre-consultation and will continue throughout the consultation process.</p> <p>Section H. below summarises the mitigation action plan, including adjustments we envisage putting in place. The fact that people who are potentially impacted will have one-to-one meetings through the consultation process means we are able to assess individual needs and engage with colleagues directly. Sex, age, disability and ethnicity are cover below alongside our overarching approach.</p>



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<p><b>G4.</b> Clearly record how you will communicate the activity to those involved, especially if their protected characteristic may be a factor. You may need to consider diverse formats such as audio, large print, easy read, and other accessibility options in various materials?</p> <p>Please ensure you utilise and reference the below documentation:</p> <p><a href="#">The-LFB-key-EDI-terminology2024.pdf</a></p>	<p>Consultation Managers will hold 1-1 meetings with at risk staff, which should consider any additional adjustments require. The member of staff will be able to bring a colleague or union representative into that meeting (and any subsequent 1-1 in this process. We will engage regularly with staff and ensure that we use a variety of channels and media so that our communication is widely accessible and understandable particularly to neurodivergent colleagues. We will be guided by:</p> <p><a href="#">Inclusive and Accessible Documents for Neurodivergent Individuals - Tips and Resources 2024.pdf</a></p> <p>Meetings can be held in a way that supports the individual, reasonable adjustments will be captured to support staff in scope of the changes.</p>
<p><b>H. Mitigating action plan</b> (where an adverse impact has been identified, please record the steps that are being taken to mitigate or justify it?)</p>	
<p><b>Protected characteristic</b></p>	<p><b>Action being taken to mitigate or justify</b></p>
<p>All</p>	<p>All staff will be provided with clarity about their own positions as early as possible. This means an ‘at risk’ meeting will be held with individuals as soon as individual consultation begins. Everyone in scope will have a meeting to explain how they are affected, and whether VR or redeployment is an option. Such meetings will take place shortly after the commencement of collective consultation.</p> <p>Selection processes will apply LFB best practice around, for example, recruitment and selection. LFB will act especially sensitively in situations where a small, possibly identifiable, number of individuals may be ring-fenced for specific role(s).</p>



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<b>Sex</b>	LFB will endeavour, as best it can, to ensure that where selection panels are required, representatives from a diverse range of backgrounds are included.
<b>Age</b>	Individuals will be able to access information on their pension positions via a portal, which will be available for self-service and ensure that those closer to normal retirement age, as well as all other staff, will have timely and accurate information made available to inform their decision making.
<b>Disability/Barrier</b>	Reasonable adjustments will be made in line with our statutory duties and any additional needs will be met whenever practicable.
<b>Ethnicity</b>	<p>As with the protected characteristic of sex, LFB will endeavour to ensure that, where selection panel, are representative of a diverse range of backgrounds. All decisions made on VR are carried out objectively and without bias, referring if necessary to the Director for People to provide expert support.</p> <p>Providing redeployment opportunities and career counselling support will be key to all affected staff on the basis of the findings of this EIA.</p>
<b>Domestic Abuse (DA)</b>	All Consultation Leads will be briefed on awareness and alertness to DA to be sensitive and curious about any colleague wishing to seek Voluntary Redundancy that it is their decision and they are not being coerced to make such an important decision about their future. Phoenix will support with this element of EIA risk. Further care will be taken to make sure a colleague who seeks work as a refuge from DA is supported.
<b>I. EIA Owner</b>	
Name: Sally Hopper Job title: Director for People Department: People Services Date: 15 July 2025	
<b>To be completed by the Inclusion Team</b>	
<b>Review date: following close of consultation on 14 August 2025</b>	



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### Part two: Inclusion team to complete - feedback and recommendations

#### J. EIA Outcomes

**Recommendation 1:**

No adverse impact(s) identified - activity continues with no change required

**Recommendation 2:**

Adverse impact(s) identified - activity continues with agreed justification or mitigation in place

**Recommendation 3:**

Adverse impact(s) identified - activity paused until justification or mitigation provided

**Recommendation 4:**

Adverse impact(s) identified - activity paused due to potentially unlawful or adverse effects which cannot be reasonable justified/mitigated.

#### 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.

Section H. above refers.

**Name:**

Director for People Services

**Sign-off Date:**

15 July 2025