



LONDON FIRE BRIGADE

Report title

People Services Strategy: Proposal for Organisational Change

Report to

People Board
Corporate Services Board
Brigade Portfolio Board
Commissioner's Board
Deputy Mayor's Fire and Resilience Board
London Fire Commissioner

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Executive Summary

The People Services Department (HR and Organisational Development function) plays a fundamental role in the delivery of LFC's ambitious transformation agenda but requires a change in its operating model as a function to achieve this.

This paper sets out a proposed target operating model for People Services, built around the introduction of an HR Business Partnering function. This widely used model delivers more efficient core HR services and partners HR with the business to drive transformation and improve leadership capability, so that leaders can drive organisational excellence through their people and practices.

Approval is sought for the proposal, and for Assistant Director People Services (ADPS) to request initial investment for the setting up of key posts in phase1 of the project. The model will be implemented in two to three further phases over the next 12-24 months.

Recommended decisions

For the London Fire Commissioner

The London Fire Commissioner approves a part-year cost of £267,708 in 2021/22 and £495,410 ongoing from 2022/23 (subject to approval in the 2022-23 budget process) for the purpose of the setting up of phase 1 of the proposal which will assist in the immediate transition to the new operating model for People Services.

That People Board

1. Approve the high-level Target Operating Model for People Services and its implementation over a phased approach.
2. Recommend approval of permanent recruitment of the senior team and initial business partner team and dedicated HR Business Partner training, enabling the department to move to Phase 2. This entails approving the expenditure of £267,708 from the Transformation Reserve Fund for 21/22 (to fund 6 months of salaries) including skills training with an ongoing increase of £495,410 from 2022/23, which will be included in the agreed budget estimates as part of the budget process.

For Corporate Services

Subject to the Portfolio Board approving expenditure of £267,708 from the Transformation Reserve Fund for 21/22 (to fund 6 months of salaries) including business partnering skills training estimated at a cost of £20,000, CSB agree in principle to an ongoing increase of £495,410 from 2022/23, for inclusion in the agreed budget estimates as part of the budget process for 22/23.

Introduction and Background

1. A People Services Review (PSR) was carried out in 2017 by AC Fire Stations at the time (Andy Roe) and the Interim Head of HR (Tracey Dennison). The aim of the Review was to create a more people focussed organisation requiring strong, professional, and credible people functions with greater synergy and connection between the people related services, some of which were situated in departments outside HR. The report was agreed in 2018 and a People Services Department created in 2018 under the Directorate of Finance and Contractual Services. A series of recommendations were subsequently implemented by the PSR Implementation Board chaired by the Director of Finance and Contractual Services, Sue Budden.
2. Following approval of PSR, Tim Powell was appointed Assistant Director for People Services (ADPS). One of the key recommendations falling to the new ADPS was to develop a comprehensive People Strategy which would help support the delivery of the Brigade's objectives and provide a professional, consistent and high-quality service.
3. However, following the findings from Phase 1 of the Grenfell Tower Inquiry and also the findings of Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS), both of which were reported towards the end of 2019, the organisation agreed to articulate more focussed strategic direction. This was partly as a result of some diagnostic work in leadership. Following on from that, development and talent processes were commissioned by the former AD of People Services, recognising that further progress and integration of that work was heavily dependent on clarity of strategic vision and direction of travel.
4. Coupled with the various areas of work identified by the LFC following an internal review as requiring change and improvement, a Transformation Delivery Plan (TDP) was developed and agreed by the Commissioner's Board. The TDP set out the Commissioner's direction of travel and a range of priorities under 4 strategic pillars. Given that people related priorities were already incorporated in the plan and included the areas of leadership, development and talent,

and wellbeing as well as Diversity and Inclusion (D&I) underpinning and enabling the TDP, it was not considered conducive to create a new and separate People Services Strategy at that time.

5. As part of the evolving transformation work, which People Services are at the forefront, the LFB has recently agreed the following four strategic priorities for the next 12 months. People Services Department lead on the first two priorities (Leadership and D&I). The priority of 'Operational Excellence' sets an expectation that every department will focus on continuous improvement. The four organisational strategic priorities are -
 - a. **Leadership:** We will place a premium on leadership skills and will invest in leadership at all levels.
 - b. **Diversity & Inclusion:** We will foster and embed a culture of togetherness so that every member of staff feels respected and valued regardless of their gender, sexuality, colour of skin, race or religion. Everyone will feel able to bring their whole self to work, feeling a sense of belonging in the Brigade because they can be themselves.
 - c. **Developing our long-term strategy:** Our long-term strategy is to become a forward-thinking service led organisation with communities at the heart of our delivery. Our priority over the next twelve months will be to develop and launch our Community Risk Management Plan, which covers the period of our strategy from April 2022 to March 2026.
 - d. **Operational Excellence:** We will build on the delivery of the Phase 1 GTI and HMI recommendations and our TDP. Through continuous improvement across our operational and support functions we will strive for excellence and efficiency in all we deliver.
6. In addition to the above, there has been a refresh of the Brigade's Risk Register at corporate, directorate and departmental level which have been broadened so that the Brigade can be confident that its risk operating environment is being sufficiently reflected and used to inform the organisation's strategic priorities. People Services risks once again feeds heavily into the People Directorate Risk Register and is responsible for 8 of the current 12 risks although this work is continuously evolving and additional risks are being considered.
7. To ensure these risks are mitigated, the People Directorate whose mission is to 'drive improvements in organisational capability through improving our people capability' has also set out five clear people priorities:
 - a. **Leadership** - Our People will be well led with the leadership behavioural framework of compassion, togetherness and accountability being the means by which people are recruited, promoted and rewarded in the Brigade
 - b. Training, **Development and Talent** - Our People will be well trained and developed so that people can maximise their talent and fulfil their true potential in the Brigade
 - c. Safety and **Wellbeing** - Our People will be safe and feel that their physical and mental wellbeing is supported at all times by the Brigade.
 - d. **Employee Engagement** - Our People will be well informed, listened to, and be engaged in decisions which affect their day to day work in the Brigade
 - e. **Togetherness** - Our People will be confident that through our work on togetherness they can bring their true authentic selves to work every day in the Brigade of which are either led by or involve significant contribution from People Services.

8. Once again, all of the above priorities are either led by People Services or require significant contribution from the department. The workplan covering these priorities also include the recent commissioning of an external review into the culture of the Brigade. People Services are again at the forefront, being at the heart of culture and organisational development, and will need to have the capability including resources to support the implementation of any recommendations.
9. The Brigade is currently developing a new Community Risk Management Plan (CRMP) and supporting Target Operating Model. Alongside this, the Brigade has also announced an external review of the culture of the organisation. Both pieces of work may result in significant organisational change for the LFB, People Services must be prepared and well equipped to provide the strategic HR and organisational development service to support the effective delivery of this change.
10. To underpin this work, the Brigade has recently launched a new behavioural framework which is currently being embedded. The service that HR provides and its working relationship with the business must support the behaviours of togetherness, compassion and accountability. For example, enabling managers to take accountability for their decisions and behave in a compassionate manner, rather than relying heavily on HR.
11. Given the scale of transformation in the Brigade set out above, the current ADPS since starting in post in November 2020 has undergone a process with the department to develop a strategy and future People Services target operating model.
12. This work has identified many strengths to the department, but has also demonstrated that the current operating model has significant limitations in its ability to deliver the organisational priorities, and is out of kilter with best practice in HR functions across the GLA family and in the wider public and private sectors.
13. It is anticipated that this investment, if approved, will deliver cashable savings over the life of the Medium Term Financial Strategy through the streamlining of key HR processes and other people-related efficiencies across the organisation. Whilst these cashable savings are not the key driver for the new People Strategy, these savings will be investigated and agreed as the implementation progresses. The Budget Submission 2022-23 includes savings to be delivered through the implementation of the People Services Strategy and TOM of £300,000 in 2023-24 and £700,000 in 2024-25. These savings are expected to be achieved following the implementation of the changes outlined in this report, as well as further developments in People Services included in the LFC Budget Submission 2022-23

Developing the People Services Strategy

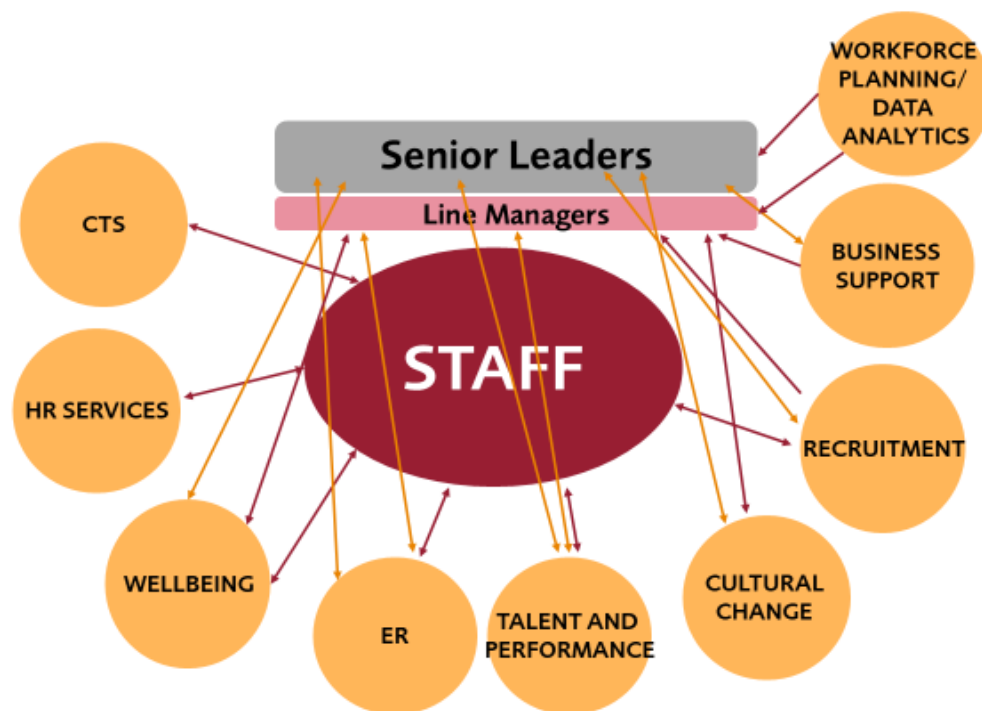
14. Since January 2021, the ADPS has led a process with the People Services Management Team (PSMT) and wider department to develop a new strategy for the department, in line with wider organisation work on developing short and medium- term priorities (CRMP) and a new risk strategy. This involved:
 - a. January 2021: Clarifying the department's purpose as '*Supporting the organisation to deliver its goals through its people*' and mapping current activities in the dept

- b. February 2021: developing a departmental risk register, identifying risks to the successful delivery of our purpose.
 - c. March 2021: a departmental-wide SWOT analysis to identify the strengths, weaknesses, opportunities and threats to the department in delivering against its purpose
15. This information has been used to develop a workplan (mapped to directorate and departmental risks) and target operating model, and to the proposal set out in this paper. This approach has ensured PSMT and wider staff involvement throughout, and the high-level proposal has now been shared with staff in the department to ensure transparent and honest communication; a core success factor in delivering change.

Current Operating Model

16. People Services is currently responsible for the following key functions:
- a. **The employee lifecycle:** from recruitment outreach to processing leavers. This includes providing advice to staff regarding employment matters
 - b. **Advice on HR casework to managers:** including discipline, grievance, sickness absence
 - c. **HR policies:** reviewing and formulating new policies.
 - d. **Industrial Relations:** working with representative bodies covering strategic and day-to-day management of the Brigade's industrial relations function.
 - e. **Counselling and Trauma Services:** contributing to mental health and wellbeing through confidential counselling; trauma prevention interventions and providing mental health support and advice.
 - f. **Wellbeing:** responsible for the development of a wellbeing strategy for the London Fire Commissioner, encompassing psychological, physical and social wellbeing support for all employees. Also providing fitness, and tailored wellbeing advice and support.
 - g. **Talent and Performance** - designing and implementing processes that help support good quality performance and talent management at the Brigade.
 - h. **Culture Change, covering -**
 - *Leadership Development* – creating a culture where people are well led and where leadership capability is developed for all our people.
 - *Diversity and Inclusion* – creating a culture where people can be themselves, they feel like they belong, where difference is celebrated, and diversity improves everything we do.
 - *Coaching and Mentoring Service* - supporting our people with coaching and mentoring to improve their ability to be successful.
 - *Learning Support* – helping individuals, teams and the organisation adapt around different neurodiverse learning needs.
 - *Outreach* – to attract, retain and support a diverse group of people to have successful fulfilling careers within LFB.
 - *Cultural Change* - providing strategic support to the organisation where issues arise to improve and change our culture.
 - i. **Workforce Planning/ Data Analytics** - providing data analysis and reporting services on a wide range of People Services data.
17. The current operating model for the department involves a staffing headcount of 103 people divided into nine functions, primarily clustered around topic area rather than skillset or

customer group and supported by a small Business Support team. All teams engage with staff and the majority engage with line managers, Directors and senior leaders. The current operating model is as shown below:



18. People Services carried out a SWOT exercise against its departmental purpose. Whilst strengths were around the professionalism of people and the introduction of automation in processes, trusted in-house counselling; significant work in Diversity and Inclusion, weaknesses were around feeling separated from the business; people caught in the system, silo working and more staff allocated to process work and less allocated to HR projects. This is reflected in the operating model above.
19. Importantly, it is concluded that the current operating model does not serve to embed behaviours, particularly accountability, through focussing heavily on the provision of advice and decision-making around people issues, rather than the coaching of senior leaders to take ownership for people decisions.

Design Principles for a Target Operating Model (TOM)

20. Following consultation with staff, the department have agreed that the purpose of People Services is to **'support the organisation to deliver its goals through its people.'**
21. To ensure a new TOM would help deliver this purpose, PSMT have developed a set of 'design principles' which the operating model will be tested against.
22. *The TOM will enable People Services to:*
 - a. Be a strategic partner to the business, advising not deciding
 - b. Deliver a seamless customer-centric service
 - c. Respond to changing priorities
 - d. Deliver tailored people projects through the use of people services that are transferrable to other organisations

- e. Embrace increased automation, reducing transactional work and increasing project work
- f. a strong reputation as a department that delivers outcomes for the business and champions better working lives
- g. Ensure consistent application of HR policies and procedures
- h. Empowers managers and leaders to live our behaviours of compassion, accountability and togetherness
- i. Have the right expertise to support the business such as organisational design and development and pay and rewards.

Best practice HR functions

23. One of the major developments in HR over the last 20 years has been the widespread implementation of the 'Ulrich model', also known as the 'Three-Legged Stool'¹, which 72% of HR functions now operate². This operating model marked a radical departure from HR sanctioned to 'play police and regulatory watchdog', and handling employee paperwork.
24. This model repositioned HR as core to helping deliver competitive advantages for business through better people management approaches, especially in organisations (such as the Brigade) where people are the organisation's greatest asset. Whilst delivering more efficient core HR services, it enabled HR to partner with senior leaders to help organisations get more from their staff, to become a champion for employees and to the benefits of positive people practices for organisational excellence, and to become a core agent for transformation and change through leveraging their expertise and understanding of people and organisations.
25. This model involves three core elements:
 - a. **Centres of Expertise:** small teams of HR experts with specialist knowledge of leading-edge HR solutions. The role of centres of excellence is to deliver business advantage through HR innovations in areas such as reward, diversity and inclusion, wellbeing, leadership, talent and performance, staff engagement.
 - b. **Service centres / HR Operations:** deliver transactional services relating to the employee lifecycle from recruitment to onboarding, payroll and all employee administration. This function often also includes a dedicated 'casework' team who provide expert advice to line managers in dealing with complex HR matters such as discipline and grievances. Their role is to provide efficient HR administration which delivers a positive employee experience.
 - c. **HR Business Partners (HRBP):** senior and experienced people professionals who work closely with business leaders or line managers, usually embedded in the business unit, influencing, steering and implementing both the business and people strategy by aligning HR capabilities across the whole organisation. HRBPs customise HR solutions to their business areas, and act as a strategic partner to business leaders, advising on matters related to people strategy, talent and organisational development.

¹ 'A New Mandate for Human Resources' David Ulrich, Harvard Business Review 1998 ([A New Mandate for Human Resources \(hbr.org\)](https://hbr.org))

² 2020 Global Talent Trends Report: The Future of Work Mercer 2020 [2021 Global Talent Trends Report | The Future of Work | Mercer UK](#)

26. A central tenet to this model is that the line manager has primary accountability for HR work, with HR providing expert advice. Roffey Park (2009) describe this as the shift from a 'purchase-sale model' whereby a manager identifies and issue and the solution, and instructs HR to deliver it, towards the 'doctor-patient' model whereby a manager brings in their HR professional to 'cure an ill' such as solving high turnover or high sickness absence, eventually towards 'process consultation', whereby HR is working collaboratively with leaders, as a true partner, to coach them to get the best from their people themselves³.
27. The model is therefore importantly supported by effective HR systems (which for the Brigade will be brought in via the new HR system, due to be implemented in March 2022). Therefore, the implementation of HRBPs can be a significant enabler for driving greater accountability for the leadership of people and of creating positive working cultures.

Role of an HR Business Partner (HRBP)

28. Although there are core principles to the model above and the role of a Business Partner, in practice organisations differ in the actual divisions of responsibilities to deliver the most suitable service to their business. This usually falls across a spectrum between:
- a. Small teams or solely individual senior HR business partners to partner the most senior leaders, with no teams beneath. The HR business partners work with leaders solely on strategic HR matters, drawing expertise and support from central HR teams. This model is that of the Metropolitan Police HR Function.
 - b. Larger HR Business Partner teams who are responsible both for strategic HR support, as well as providing operational services for the designated business area such as HR casework and HR lifecycle administration. This is the current model for the GLA HR function and is usually more common in smaller organisations.
29. In practice this also means that the role of an HR business partner often shifts between the three roles set out above (purchase-sale model, 'doctor-patient', and 'process-consultation').

Proposed Operating Model

30. The image below depicts the proposed operating model for People Services which is based upon the 'Three legged stool' described above, but with an additional emphasis placed on the importance of data and analytics. There is increasing recognition of the importance of data in driving HR work and hence this is a core function.
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Proposed Operating Model

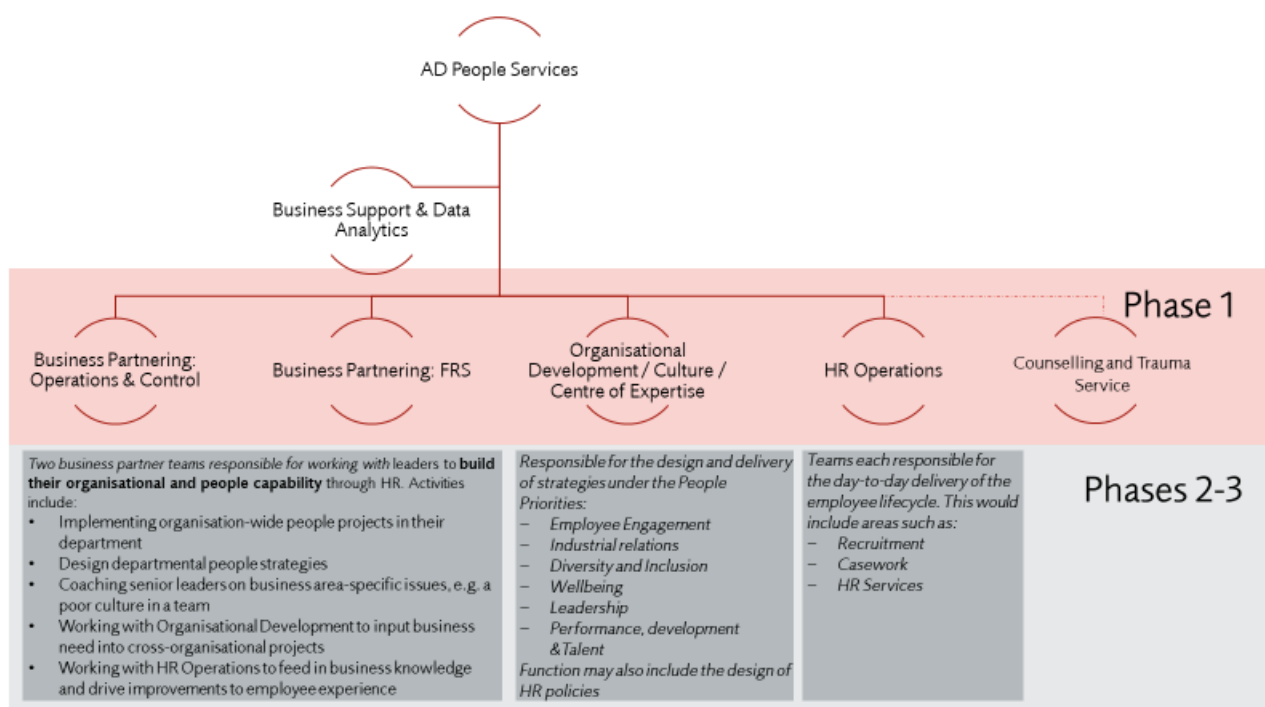


⁴'Getting the most from Business Partnering. Roffey Park 2009 [HRBP-report-with-covers.pdf](http://hrbp-report-with-covers.pdf) (roffeypark.ac.uk)

31. Target operating models have several key building blocks, which are each taken in turn below. These includes **structure, skills, systems and governance**. The focus of this paper is on **structure** and **skills** required, given that is where the funding is required for initial change.

Structure

32. The current management structure of the department is attached at Appendix 1.
33. If the principle of the above proposed operating model and direction of travel is approved encompassing the business partner function, the following high-level structure for the department is proposed.



34. An important feature of the proposed structure is that the business partner team would not be responsible for dealing with HR issues regarding individuals. These would be the responsibility of HR operations, either via HR Services or a dedicated 'casework'⁴ team providing expertise in managing complex HR cases (E.g. Discipline, grievances).
35. It is proposed that this is implemented over 12-24 months in four phases:
- Phase 1:** Set up of senior positions and HR Business Partner teams. This would be based on an aim of 50% internal appointments with development, and 50% external appointments bringing HR Business Partner experience (3-6 months)
 - Phase 2:** Detailed design, transitioning our current functions and team to the new model. Teams that can neatly transfer to the new structure may transfer at this point (e.g. data analytics, CT&S, recruitment) (3-6 months).
 - Phase 3:** Full transition of current functions to new, but potentially with a transition period (e.g. with 'HR casework' dotted line to HR business partners and programme of training for managers on HR policies and procedures. (12 months))
 - Phase 4 (TBC):** full model is implemented.
36. As set out above the actual responsibilities of an HRBP vary. As such, Phase 2 enables us to determine the exact responsibilities of each function and how they work together, in a manner that works best for the business.

⁴ Note that the exact titles for teams including Business Partners will be determined in Phase 2

Phase 1 details and requirements

37. Phase 1 will focus on recruiting to senior posts and the setting up the initial business partner teams. This will provide additional resource and the required capability to enable Phase 2 which will focus on the detailed design.
38. Two permanent TMG C posts will be required to head up the key positions of Organisational Development and Operations. A recruitment process will be carried out and the positions will be advertised internally first. Two permanent senior HRBP roles will also be required at FRS G level. 50% of the proposed HRBP roles will be advertised internally first, with development offered.
39. Phase 1 also includes an option for three additional permanent HRBP team positions to be created at FRS F level.
40. In option one, seven new posts are proposed with funding being requested for six posts. This is because as a result of the transfer of the current DAC from People Services to NW Area, ADPS has used her delegated authority to delete the existing DAC post from the PS establishment and to create a TMG C post. This has resulted in a small saving.

Option 1 (Recommended)

- 1x TMG C Head of Organisational Development (conversion of existing DAC)
 - 1x TMG C Head of HR Operations
 - 1x FRS G Senior HR Business Partner: Operations and Control
 - 1x FRS G Senior HR Business Partner FRS:
 - 2 x FRS F Business Partner Ops
 - 1x FRS F Business Partner, FRS
41. Therefore, if this option is approved, the maximum funding requested is **£247,708** (based on 6 months) from the Transformation reserve fund in 2021/22. The ongoing cost would then be £495,410 from 2022/23, which would require additional funding as part of the budget process.
 42. This option will help establish the business partner teams and mark a significant change in direction. This is a change for the department but also a change for the organisation in its interaction with HR, and thus the additional capacity will help widen understanding, and raise awareness of how business partnering works. It also brings more external business partner capability into the organisation.

Option 2 (Not recommended):

43. In option two, funding for three permanent key positions (i.e. 1x TMG C and 2x FRS G) would be required -
 - 1x TMG C Head of Organisational Development
 - 1x TMG C Head of HR Operations
 - 1x FRS G Senior HR Business Partner: Operations and Control
 - 1x FRS G Senior HR Business Partner: FRS

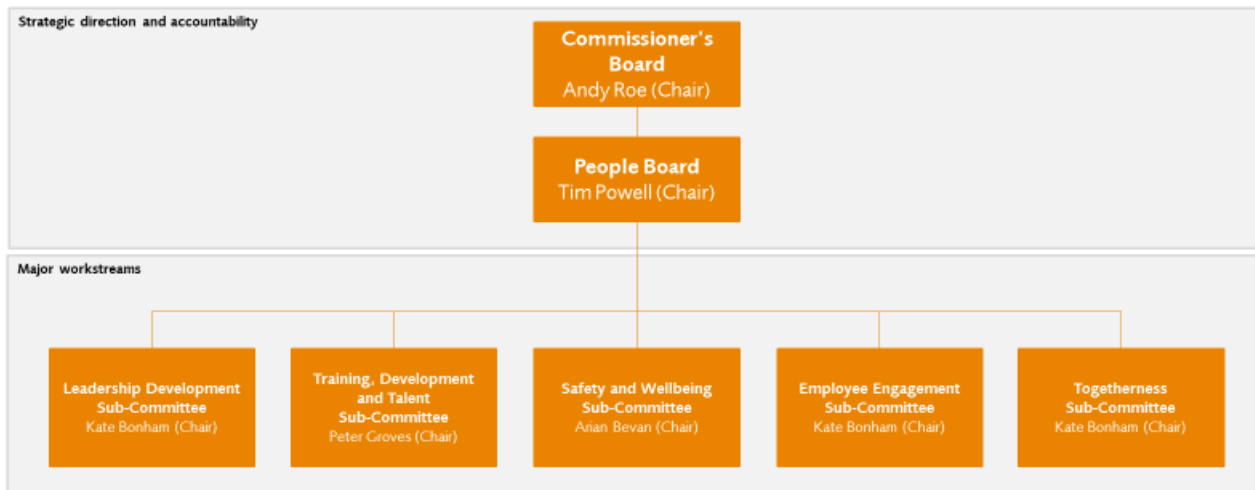
44. Therefore, the maximum funding required for Option two is **£143,047**(based on 6 months)
45. This option would be lower cost and would enable the senior BP to shape their team. However, this option is not recommended as it would limit the impact that business partnering can make; thus potentially preventing business partnering from landing well in the business as there would not be enough capacity for anyone to feel any different.
46. Importantly, the request for funding provide headroom for the ADPS to recruit into these roles rather than reposition existing staff. Existing staff will be strongly encouraged to apply, and if successful, backfilling their current posts will only be considered in light of the new structure.

HRBP Skills

47. The success of the operating model is dependent on HRBPs having the appropriate skills and training. The key traits of a BP are that they should be -
- ✓ A trusted and equal partner
 - ✓ A critical voice and coach
 - ✓ Builds credible knowledge and understanding of the business areas
 - ✓ Generates insight from data and evidence
 - ✓ Brings an external perspective
 - ✓ Proactive and tenacious
 - ✓ Has generalist HR knowledge but able to draw on expertise
48. Therefore, there will need to be a focus on the development of skills across the department such as business partnering, understanding of the business, D&I, Employment law, Data Analytics and organisational development skills.
49. Funding would also be required for skills development to support business partnering, should internal candidates be successful. Initial research indicates it is likely to be in the region of **£15000 - £20,000 for** 14 people without customisation and funding is being asked for this too.

Governance

50. Another key building block to the operating model is governance. Paragraph 7 of this report sets out the five key strategic people priorities for the People Directorate. Governance arrangements are in place though the People Board (chaired by the Director for People) to provide assurance to the Commissioner on the Board's priorities. It has also been agreed to set up five sub committees of the People Board as set out below to further focus on the objective priorities of the Board.



51. The proposed new operating model would therefore enable the department to link directly with the business through proper and robust decision-making processes.

Systems

52. Robust systems are also fundamental to the TOM and the department's work in delivering its priorities. Important LFC decisions have been already taken in relation to two projects which will be key to the future of People Services -
- The replacement of the current HR and payroll system is underway (LFC-0458y refers) and implementation currently is due in April 2022. The new system will result in efficiencies over time with improved and increased automated processes.
 - The current occupational health contract has been extended until March 2023 (LFC-0437y-D refers) to provide sufficient time for LFC to explore with TFL the possibility of it providing an occupational health service to the LFC comparable to that already received and at the same or less cost.

Comparators and Future Collaboration

53. The cost effectiveness of an HR function is often measured via an HR to employee ratio. LFB's current ratio is 1:58, and with Option 1 would increase to 1:54 and with our full indicative growth bid to 1:49. According to Bloomberg (via Corporate Research Forum (CRF⁵)), the rule-of-thumb ratio is 1:71, which is at an all-time high⁶, however the CRF stressed that this should only be a guide, as the ideal ratio is so contextual. HR to employee ratios vary significantly depending on the size and complexity of the workforce in an organisation, and the functions that are classed as HR. In addition, organisations without an effective HRIS system, leadership buy-in to the role of HR and investment in line manager development, organisations tend to

⁵ Corporate Research Forum: Membership network for HR practitioners [Homepage - Corporate Research Forum \(crforum.co.uk\)](https://www.crforum.co.uk)

2017 HR Benchmarks Report. Bloomberg [HR WP HR Dept Benchmarks and Analysis 062917-1.pdf \(employersguardian.com\)](https://www.employersguardian.com/hr_wp_hr_dept_benchmarks_and_analysis_062917-1.pdf)

have a higher ratio. Across the GLA family, ratios vary from 1:25 in OPDC to 1:292 in the MPS⁷. As such a ratio of 1:49 at this stage in LFB's transformation would not be unexpected.

54. All other functional bodies (apart from the very small organisations of OPDC, MOPAC and LLDC) have an HR Business Partnering Function. In the sharing of HR services or collaboration, the HR Business Partner function is often the function retained in the organisation. LFB is committed to identifying opportunities for collaboration, and the proposed TOM will enable the LFB to bring its structure in line with best practice, future proofing it for future collaboration opportunities should they arise in the coming years.
55. The benefits for leaders and senior managers as users of this model will be that they will have direct access to HRBPs who will work with their leadership teams to develop departmental-specific people plans that enable them to get the best from their staff. In practice this means using qualitative and quantitative workforce data and insights to design HR and organisational development solutions such as coaching, team development and leadership training that get to the source of people issues as opposed to solely focussing on dealing with individual concerns as they arise.
56. The proposed role of HR Business Partners differs to the role of LFB's Finance Business Partners who are at FRS D level. Our Senior HRBPs and HRBPs will operate at a strategic level partnering the most senior leaders in the organisation and are expected to have a high level of influencing skills alongside their professional expertise. They will often have to challenge the status quo at a senior level, develop novel HR solutions and contribute to departmental strategy.

Risks to implementation

57. Whilst research has shown that there are clear benefits of this model delivering services more efficiently and in a more standardised way, as well as positioning HR as a strategic partner to the business, there are risks with business partnering, which are well documented in research. These are set out in the below table with mitigations.

Risk	Mitigation
HR Business Partners are unable to operate at a strategic level as they are drawn into support the business with individual personnel or casework matters.	1) The proposed structure clearly places the responsibility for individual HR issues with HR operations, either through HR services or through a dedicated team of 'caseworkers' advising on complex HR matters (e.g. Disciplinary). 2) The phased introduction over two years enables time to upskill the organisation and to determine the exact HRBP responsibilities that work for the business 3) The preferred option of a larger business partner team for Phase 1 signals a significant change and provides capacity to upskill the organisation
Business leaders do not understand the role of an HRBP or have expectations inconsistent with the model. They may expect 'their' business partner to act as a single interface into the HR organisation, taking care of all their people needs.	
This can be partly driven by a lack of HRBP capability (e.g. 'rebadging' as HRBPs).	

⁷ Taken from the GLA Group Collaboration Board Report, August 2020

	4) Internal candidates who are successful will be provided with development 5) Wider upskilling for People Services on the role of an HR business partner
The design reinforces or creates new silos across different parts of HR or the business.	The phased approach will enable us to design the exact responsibilities and interfaces between teams. This may include a 'dotted line' between teams in each function, e.g. Wellbeing and specific teams within HR Services delivering relevant services.

Business Case

58. At its core, this investment enables the LFB's HR function to move from dealing with individual HR and personnel issues, to partnering with the business to drive systemic change in terms of people, thus:
- Getting the right people (with the right skills who represent the society we serve) in the right place at the right time, thus maximising organisational efficiency and effectiveness through higher productivity and reduced absenteeism.
 - Making sure that every member of staff would recommend LFB as a place to work to their family and friends (the 'family and friends' test), indirectly maximising efficiency and effectiveness through an engaged workforce.
59. This is vital if we are to meet the ambitions around people and culture set out earlier in the paper, and if we are to be prepared to respond to the impact of the CRMP, the external review of culture, and further HMI inspections.
60. This model does this by positioning HR as a strategic partner to the business to:
- Implement initiatives developed by HR more successfully, through working with leaders to embed into the business and feed business knowledge and insight into the design of such initiatives;
 - Design and deliver targeted HR interventions in business areas through research and data analytics to support business need, focussing resource and expertise where it is most needed.
61. A detailed plan for return on investment will be determined through Phases 2 and 3. However, ADPS is confident that there will be efficiencies over the next 3-5 years. Initial savings of some £150,000 are predicted in the short-term which will include HR transactional services. This is as a result of an initial review of HR Services in 2019, following which a number of HR processes were streamlined. Further efficiencies are likely to be achieved once the new HR system is implemented and the detail of these is still to be worked up.
62. It is envisaged that the new operating model will deliver cost savings in the long term in a number of areas, and will help to reduce the current impact of both directorate and departmental risks, and help the implementation of HMI and TDP actions. These areas are set out below -

Activity	Issues/facts	Anticipated return on Investment under new TOM
Discipline /Grievance cases This will be covered by a new Corporate risk on Culture Review	In both 2018/19 and 2019/20, 79 (stage 2 and stage 3 discipline hearings) and 14 appeals hearings took place 131 grievances were also raised during this time of which 14 were withdrawn. There are 7 full time equivalent HR Advisers (HRAs) to support the work and cases are split across the team depending on workload. The amount of resource required for a grievance case varies significantly depending on the complexity. However, as a guide, this could require 12.5 hours of combined HR Advisor and Manager time per case.	The implementation of our TOM enables HR to work with leaders to improve the wider cultural or behavioural issues (i.e. the source of issues) in business areas. It also enables us to deliver the improvements to our policies and procedures in areas such as recruitment and promotions and improve manager capability. This all serves to improve working environment and hence the number grievance cases, and lower-level discipline cases. It is worth noting that the majority of serious discipline cases are related to matters outside work (e.g. criminal convictions, drug misuse). As a guide, if the number of grievances decreased by half, this could save the organisation approx. 365.6⁸ hours in HR support and management time per year.
Employment Tribunals (Departmental Risk on HR practices and policies)	In both 2018/19 and 2019/20, 21 new claims received each year. In 2020/21, there are 7 new cases so far with a significant backlog of cases. The cost per claim varies. Most discrimination cases are listed for around 4-6 days which will cost around £15-£20,000 to defend (not including officer time, but including LFB lawyers). For lengthier cases this can cost significantly more.	As above, the implementation of this model has the potential to reduce the number of Tribunals through increased resource to solve people and/or cultural issues at source. For example, if the number of employment tribunals halved, this has the potential to save the organisation £200,000 per year.
Sickness Absence (covered by Directorate Risk on Wellbeing)	The cost of absenteeism in the Brigade increased from some £14,000,000 in 2018/19 to some £17,000,000 in 2019/20. This reduced slightly to some	The implementation of HR Business Partnering enables HR to work with leaders to improve the wellbeing of staff through tackling the source of poor wellbeing.

	£16,000,000 in 2020/21 equating to 58,228 lost working days	As such this should serve to reduce sickness absence levels. If sickness absence reduced by 1 day, it is estimated that this would save some £1,706,665 (based on staffing costs and sickness absence for 2020/21)
Leadership (Directorate Risk)	A lack of leadership capability has been identified as a key departmental and directorate risk due to a lack of investment over a number of years. To mitigate this, £580,000 has been allocated to supervisory and middle-leader programmes over the next 3 years.	The implementation of the TOM enables - Formal leadership programmes to be better tailored to business need and more thoroughly embedded, thus gaining greater value for money from investment in leadership courses - HR Business Partners to act as strategic advisers to the most senior leaders, working with leadership experts in the HR OD Team to design specific interventions to improve leadership capability in specific business areas.
Performance and talent framework Action (HMI 24) (Directorate Risk)	£80,000 spent for the 360 degree feedback process for the new performance framework including consultancy support and delivering webinars to staff.	The implementation of the TOM would enable more effective implementation of the performance and talent framework and hence return on that investment through: - a better understanding of the needs of the organisation and a more targeted approach to using 360 feedback for particular departments/ ranks & grades. - Less reliance on external consultants for the delivery of training and briefings as leaders would be equipped with support from HR Business Partners to co-deliver
Workforce planning/succession planning (Directorate Risk)	This is a key departmental and directorate risk. Current workforce planning and succession planning is managed by the Establishment Board so that the Brigade is not exposed by having insufficient numbers of skilled staff in place which could be further exacerbated by imminent pension changes	The new model will ensure that there is sufficient input into the business on modelling assumptions and calculations which will lead to the development of robust succession planning processes and a talent framework model. This also has the potential to reduce the cost of PAO.

	leading to higher numbers of staff leavers and recruitment gaps. The current Pre-Arranged Overtime (PAO) cost for 2021/22 is £1.2m.	
Support to trainees during Apprenticeships (Corporate/Directorate Risk led by PS department)	This has been identified as a corporate risk and whilst a number of controls are in place including welfare support calls to existing firefighters on development (FFDs), immediate issue management and introduction of buddy schemes, key work is required in relation to the culture review, FFD review and Training review (the latter 2 are not led by PS) and also on implementing changes to the transfer and placement processes for FF(D)s in future.	This work crosses over a number of departments and the new model will provide a more methodical approach in terms of HR interaction and keeping the business informed with the aim of mitigating risk.
'Friends and Family' test (Directorate 'True North' KPI)	Of the 137 individuals who received exit interviews between 1 January – 30 June 2021, 41.61%, said they would recommend the LFB to friends and family, 16.06% said they wouldn't, whilst 42% did not respond.	Implementing the TOM would - allow the necessary engagement to take place to reach out to the 42% of no responses and - enable the delivery of improvements to the working environment to meet our aims of 100% of staff recommending the LFB to friends and family.

63. The request for initial investment will undoubtedly provide the ADPS with the headroom to build an HR function that is fit for purpose and aligned with best practice. Furthermore, whilst transitioning to the new model, The ADPS will only backfill vacancies that arise in People Services if they fit the new model to ensure that the maximum efficiencies are gained, and will commit to providing a detailed future savings plan for the 2023/24 budget planning round, once the detailed design is complete.

Application for Transformation Funding

64. The Investment Bid has been assessed using the LFB triage criteria for investment bids developed by Portfolio Board (24 March 2021). Whilst a detailed plan for return on investment will be determined following phases 2 and 3 of the project, some measurable assessment of value is available at this stage.

Organisational Risk Reduction Quantified

65. The criteria for calculating the triage score is to demonstrate how the proposal will reduce a specific risk score. Paragraph 6 of this report indicates that the department leads on eight Directorate risks which are at amber level but have the potential to change to red at any time or become a corporate risk. In addition,

- the Department leads on 1 red risk at corporate level relating to support given to trainees during apprenticeships. A further risk is likely to be added on the Culture Review.
- the Department feeds into a red directorate risk led by Training and Professional Development Department and also a red risk led by the Transformation Directorate.

66. Risks identified will be impacted by the outcomes of the investment. As mitigation and risk reduction are quantified and quality assured by LFB's risk team/agreed with Directors, a score of 5 is agreed.

Delivery Plan

67. Paragraph 34 sets out the timeline of the proposal to be implemented over the next 12-24 months. Whilst the focus is phase 1, phases 2 and 3 will cover design and implementation. The department's workplan encompassing key priorities and timelines is an evolving piece of work and detail work is on-going. A score of 3 is therefore agreed.

Business as usual cost and impact

68. The paper throughout details the aims and advantages of the proposed TOM and in particular the new business partnering model. Paragraph 61 identifies where existing work is likely to decrease. Paragraphs 32-35 identify where work would move from one team to another and where further work is required as part of phase 2. A score of 4 is agreed as there is a quantified change in terms of impact on resources and costings set out paragraphs 36-41.

Benefits Understood

69. Paragraphs 57-59 set out the benefits understood. The business partnering model and proposed TOM is explained throughout the paper emphasising the positive impact of the proposal including what will be different as a result of the proposed change for the department and for the organisation. Paragraph 61 gives some baseline information to the measurement of particular areas so that impact of the investment can be tracked. On this basis, a score of 4 is agreed.

Return on Investment (ROI)

70. As paragraphs 60-61 demonstrate, there will be substantial financial benefits both in the short term and long term. Whilst challenging to detail at this stage, paragraph 62 explains that a more detailed savings plan for the 23/24 budget planning round will be developed once the detailed design is completed at phase 2. A score of 2 is therefore agreed.

The table below summarises the scores for each criterion and the overall score -

Criteria	Paragraphs	Score	Weighting	Weighted score
Organisational risk reduction quantified	6, 61	5	0.3	1.5
Delivery Plan	34	3	0.2	0.6
BAU cost and impact	32-41	4	0.2	0.8
Benefits understood	57-59, 61	4	0.2	0.8
Return on Investment	60-62	2	0.1	0.2
TOTAL				3.9

Alternative options considered

71. The ADPS has considered a non-growth option for implementing this target operating model. However, this is not proposed as it would require repositioning existing staff without a test of skills and capabilities in business partnering, and likely leave important gaps in experience and capacity elsewhere, both in areas such as HR advice and support, as well as our priority project work in culture change and elsewhere.
72. As such, this initial investment is required to implement the model properly, without resulting in significant impacts on the services the People Services provide over the next 12-24 months.

Impacts

Equality Impact

73. The London Fire Commissioner and decision takers are required to have due regard to the Public Sector Equality Duty (s149 of the Equality Act 2010) when taking decisions. This in broad terms involves understanding the potential impact of policy and decisions on different people, taking this into account and then evidencing how decisions were reached.
74. It is important to note that consideration of the Public Sector Equality Duty is not a one-off task. The duty must be fulfilled before taking a decision, at the time of taking a decision, and after the decision has been taken.
75. The protected characteristics are: Age, Disability, Gender reassignment, Pregnancy and maternity, Marriage and civil partnership (but only in respect of the requirements to have due

regard to the need to eliminate discrimination), Race (ethnic or national origins, colour or nationality), Religion or belief (including lack of belief), Sex, Sexual orientation.

76. The Public Sector Equality Duty requires us, in the exercise of all our functions (i.e. everything we do), to have due regard to the need to:

- a. Eliminate discrimination, harassment and victimisation and other prohibited conduct.
- b. Advance equality of opportunity between people who share a relevant protected characteristic and persons who do not share it.
- c. Foster good relations between people who share a relevant protected characteristic and persons who do not share it.

77. Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard to the need to:

- a. remove or minimise disadvantages suffered by persons who share a relevant protected characteristic where those disadvantages are connected to that characteristic;
- b. take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- c. encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

78. The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.

79. Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard to the need to—

- a. tackle prejudice, and
- b. promote understanding.

80. The recommendations set out in this paper aim to ensure we meet our legal duty set out in the Equality Act 2010 and Public Sector Equality Duty through a number of means. Following work carried out by PSMT, staff have been consulted on the proposal including the Business partnering model. An EIA is attached at Appendix 2 but as this work will be evolving, it is intended to review and update as the project develops. There will be consultation with ESGs and if necessary, focus groups as the project evolves. Further EIAs will be drafted to focus decision making.

Procurement and Sustainability

81. Procurement department will be consulted on the requirements for skills development for staff to undertake business partnering. Consideration will also be given to the feasibility of using a search company for the external HRBP roles.

Strategic Drivers

82. The focus of this paper in the main relates to the content of the first pillar of the Transformation Delivery Plan: Best People, Best Place to Work but has relevance throughout the plan with the Togetherness Strategy as an enabler.

Workforce Impact

83. Adoption of the recommendations within this report will impact positively on the entire Brigade workforce by strengthening delivery of the People Directorate and organisational people priorities as set out in the report.
84. As described in the report, the proposed TOM for People Services will require new ways of working for the department and a new structure. Staff within the department have been briefed on the proposals: initially the focus has been on phase 1 which is about budget growth and the opportunities for staff to apply for the proposed new positions and to receive skills development in the area of business partnering. Staff will continue to be engaged throughout the development of the new Target Operating Model.
85. An initial briefing session on the proposals was held with GMB/UNISON on 28 May 2021, and the trade unions were reassured that they will be fully consulted as the project develops.

Finance comments

86. This report recommends that an immediate transition is agreed to a new operating model for People Services. This will be at a part-year impact of £267,708 in the 2021-22 financial year, which includes £247,708 to fund an additional six posts and £20,000 for skills development, to be met from the transformation reserve. The full year impact of this will be £495,410 from 2022-23, which has been included as a proposal for growth as part of the 2022-23 Budget Submission to the Mayor. If the new growth proposal is not agreed as part of the Mayor's Budget 2022-23 there will be a budget gap of £495,410 from 2022-23 onwards.
87. The Budget Submission 2022-23 includes savings to be delivered through the implementation of People Services Strategy and TOM of £300,000 in 2023-24 and £700,000 in 2024-25. The detail of these savings will be considered as part of the budget process for future years.

Legal comments

88. This report sets out proposals for a new People Services Strategy to be implemented as part of the transformation work, to ensure organisational HR support is fit for purpose for the London Fire Brigade.
89. In general, the Head of Service for People Services has delegated authority to determine matters that relate to the internal management and structure of the department.

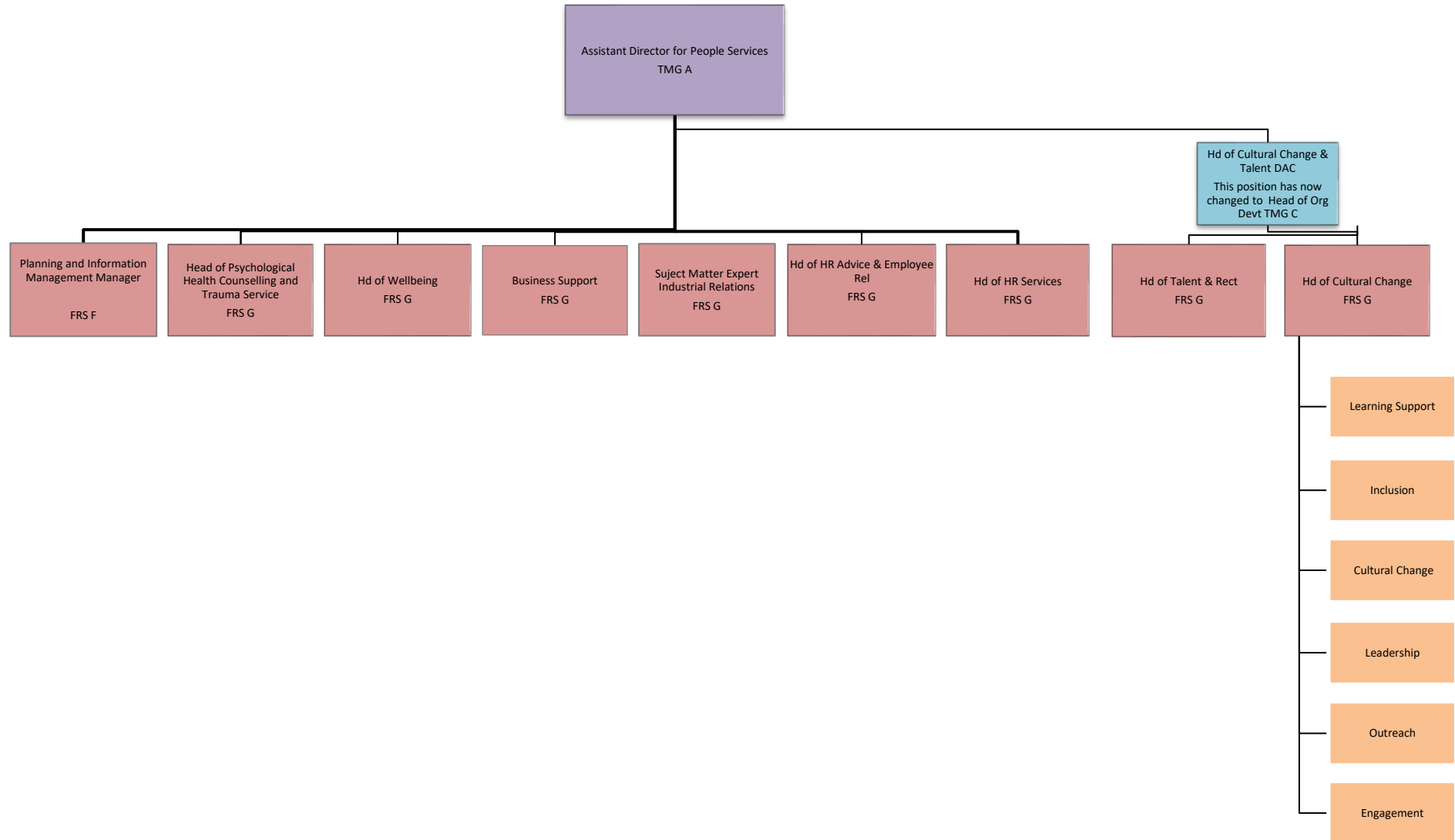
90. Under section 9 of the Policing and Crime Act 2017, the London Fire Commissioner (the "Commissioner") is established as a corporation sole with the Mayor appointing the occupant of that office.
91. Section 1 of the Fire and Rescue Services Act 2004 (the "2004 Act") states that the Commissioner is the fire and rescue authority for Greater London.
92. Under section 327D of the GLA Act 1999, as amended by the Policing and Crime Act 2017, the Mayor may issue to the Commissioner specific or general directions as to the manner in which the holder of that office is to exercise his or her functions.
93. By direction dated 1 April 2018, the Mayor set out those matters, for which the Commissioner would require the prior approval of either the Mayor or the Deputy Mayor for Fire and Resilience (the "Deputy Mayor"). In particular, Part 2 requires the Deputy Mayor prior approval to be obtained where there is a commitment to expenditure (capital or revenue) of over £150k as identified under normal accounting rules.
94. In accordance with the LFC's Scheme of Governance, the London Fire Commissioner must also provide approval of any expenditure over £150k before the Deputy Mayor agrees it.
95. This report fulfils the aforementioned purpose.

List of Appendices –

Appendix	Title	Protective Marking
1.	PS Management Structure	
2.	EIA	

PEOPLE SERVICES MANAGEMENT STRUCTURE

Appendix 1



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Equality Impact Assessment (EIA) Form

The **purpose** of an EIA is to give **as much information as possible** about potential equality impacts, to demonstrate we meet our **legal duties** under the Equality Act 2010.

Please read the EIA Guidance [on Hotwire](#) before completing this form.

1. What is the name of the policy, project, decision or activity?

People Services Strategy – Proposal for organisational change

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

High		Medium		Low	X
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2. Contact details

Name of EIA author	Kush Saini
Department and Team	People Services, Business Support
Date of EIA	4 June 2020

3. Aim and Purpose

What is the aim and purpose of the policy, project, decision or activity?	This EIA is being written specifically to support phase 1 of the proposal for organisation change in People Services and will potentially form part of several EIAs throughout the project. The paper sets out a proposed target operating model (TOM) for People Services, built around the introduction of an HR Business Partnering function. Approval is being sought for the direction of travel and resulting TOM. The model is to be implemented as a phased approach. Phase 1 – set up senior positions and HR Business Partner teams Phase 2 – detailed design, transitioning current functions and teams to the new model Phase 3 – Full transition of current functions to new with transition period. Phase 4 (tbc) – full model implemented
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	The report focuses on phase 1 which asks for initial investment to set up key roles and skills training to commence the transition to the new operating model. The benefits will be to provide sustainable and high-quality HR and organisational development support to the Brigade. Investment will result in savings in future years, (although this will be subject to further detailed work in phases 2-3).
Who is affected by this work (all staff, specific department, wider communities?)	All PS staff will be affected as it is about organisational change – the focus for phase 1 is on initial set up and skills training Phase 1 seeks investment for additional permanent senior posts (option 1 which is the recommended option) 1xTMG C, 2xFRSG and 3xFRS Fs. Option 2 is 1xTMG C and 2xFRS G. It is envisaged that TMG posts will be advertised internally in the first instance and that 50% of the HRBP roles will be advertised internally with development offered. Depending upon mapping of current roles to new roles, there is potential for existing people to be transferred into new posts. For Phases 2 and 3 and for decision points, further EIAs will be drafted to ensure due regard is observed throughout the process

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

What consultation has taken place to support you to predict the equality impacts of this work?	Following work carried out by PSMT, staff have been consulted on the proposal including the Business partnering model. Phase 1, which is the focus of this paper, is about requesting initial investment for additional senior posts and for skills development in Business partnering. There will be consultation with ESGs and if necessary, focus groups as the project evolves. Further EIAs may be drafted to focus decision making. GMB/UNISON have received an initial briefing on the proposal and have been assured that they will be kept fully informed as the project develops.
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5. Assessing Equality Impacts

Use this section to record the impact this policy, project, decision or activity might have on people who have characteristics which are protected by the Equality Act.

Protected Characteristic	Impact: positive, neutral or adverse	Reason for the impact	What information have you used to come to this conclusion?
<i>Example: Age</i>	<i>Adverse</i>	<i>Moving this service online will adversely affect older people, who are least likely to have access to a computer or smart phone and may not be able to use the new service.</i>	<i>GLA Datastore: X% of the London community are aged 70 or over. GLA data shows that only 10% of those over the age of 70 have regular access to a computer or smart phone.</i>
Age (younger, older or particular age group)	Positive	The new positions when advertised will be applied equally to all employees under all nine protected characteristics including age. There is an opportunity to improve representation under all characteristics at TMG and at FRS G level External applicants will have the opportunity to apply for HRBP roles and also for TMG roles if not awarded internally in the first instance Skills development will be available for staff in relation to the proposed new function of business partnering. Experts in the field will also be brought in to speak to staff about business planning	The breakdown of TMG and FRS G level representation is attached as an Annex to this EIA



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		Level of experience required at the proposed levels may inadvertently disadvantage younger applicants, but there is an option to have achieved the relevant HR qualifications as an alternative Brief and advertise roles via ESGs	
Disability (physical, sensory, mental health, learning disability, long term illness, hidden)	Positive	Brief and advertise roles via DWG, and neurodiversity ESG	Adverts All adverts have the following statement: We value the diversity of our employees and aim to recruit a workforce which reflects our diverse communities across London. The London Fire Commissioner is an Equal Opportunities Employer and we positively welcome applications from all suitably qualified individuals, irrespective of people's age, disability, gender, race or ethnicity, religion or belief, sexual orientation, or other personal circumstances. We have guidance in place to ensure that all applicants are treated fairly and consistently at every stage of the recruitment process, including the consideration of reasonable adjustments for people who have a disability. On-line application form
Gender reassignment (someone proposing to/undergoing/ undergone a transition from one gender to another)	Positive	The new positions when advertised will include a statement that invites applications from under-represented and protected characteristic groups	



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Marriage / Civil Partnership (married as well as same-sex couples)	Positive	The proposed roles will be normal working hours/flexible working/remote working which supports family life	Flexible Working Policy incorporating new home working policy
Pregnancy and Maternity	Positive	The proposed roles will be normal working hours/flexible working/remote working which supports family life	Flexible Working policy incorporating new home working policy
Race (including nationality, colour, national and/or ethnic origins)	Positive	There is an opportunity to consider positive action in terms of recruitment – e.g. where <i>ethnically diverse staff are underrepresented</i>	Outreach team support Supports Togetherness Strategy (action 14 to support and develop inclusive leaders at all levels of the organisation to have increased confidence and ability to lead inclusively) Ethnicity pay gap report and improving representation
Religion or Belief (people of any religion, or no religion, or people who follow a particular belief (not political))	Positive	The new positions when advertised will include a statement that invites applications from under-represented and protected characteristic groups	
Sex (men and women)	Positive	There is an opportunity here to increase representation at a senior level. Overall, the London Fire Brigade continues to have pay differentials in favour of women for median and mean pay rates.	Gender pay gap report
Sexual Orientation (straight, bi, gay and lesbian people)	Positive	The new positions when advertised will include a statement that invites applications from under-represented and protected characteristic groups	

6. Impacts outside the Equality Act 2010	
What other groups might be affected by this policy, project, decision or activity?	
i.e. carers, non-binary people, people with learning difficulties, neurodiverse people, people with dyslexia, ADHD, care leavers, ex-offenders, people living in areas of disadvantage, homeless people, people on low income / poverty?	
As above	

7. Legal duties under the Public Sector Equality Duty (s149 Equality Act 2010)	
How does this work help LFB to:	
Eliminate discrimination?	In phase 1, there is a requirement for TMG C posts and senior Business partner roles to have CIPD qualification or relevant experience. It is envisaged that the two TMG C posts will be advertised internally before being advertised externally 1x FRS G senior HR BP role will be advertised internally with development offered and a second FRS G recruited externally Additional EIAs will be submitted for Phases 2 and 3 where there may be an impact on staff.
Advance equality of opportunity between different groups?	Mixture of internal and external post holders under the new proposal will assist in building a strong knowledge base and expertise. Skills training will be part of development contributing to positive action. Additionally, we will undertake positive action in recruitment both internally and externally (working with accredited organisations such as BITC and Stonewall etc)
Foster good relations between different groups?	To share good practice/expertise – consulting with ESGs and keeping TUs informed

8. Mitigating and justifying impacts		
Where an adverse impact has been identified, what steps are being taken to mitigate it? If you're unable to mitigate it, is it justified ?		
Characteristic with potential adverse impact (e.g. age, disability)	Action being taken to mitigate or justify	Lead person responsible for action
Level of experience required at the proposed levels may inadvertently disadvantage younger applicants,	JDs include relevant HR qualifications or experience	Kush Saini
Underrepresentation at TMG and FRS G levels	Briefing/consulting ESG on proposal/potential repositioning of staff	Kate Bonham/Kush Saini
Underrepresentation at TMG and FRS G levels of black and Asian men	Briefing/consulting ESG Potential for Outreach team support	Kate Bonham/Kush Saini

Now complete the RAG rating at the top of page 1:

High: as a result of this EIA there is evidence of significant adverse impact. This activity should be stopped until further work is done to mitigate the impact.

Medium: as a result of this EIA there is potential adverse impact against one or more groups. The risk of impact may be removed or reduced by implementing the actions identified in box 8 above.

Low: as a result of this EIA there are no adverse impacts predicted. No further actions are recommended at this stage.

