

Report title

Proposal on the Recommencement of Trainee Firefighter Recruitment

Report to

People Board
Commissioners Board
Deputy Mayor's Fire and Resilience Board
London Fire Commissioner

Date

24 June 2021
14 July 2021
17 August 2021

Report by

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Report number

LFC-0552y

Protective marking: **NOT PROTECTIVELY MARKED**

Publication status: Published in full

If redacting, give reason:

Executive Summary

To meet the residual budget gap of £5.9m in 2021/22 increasing to £14.7m in 2022/23, a recruitment freeze was proposed for two years and approved for Operational staff effective from April 2021. This report outlines the impact to the operational establishment as part of that freeze when considered alongside the upcoming Firefighter pension remedy and recommends that firefighter recruitment and training is restarted to minimise future impact, in light of further progress regarding the overall budget forecast.

. If this recommendation is agreed it is forecast that savings would still be achieved in excess of those set out in the 2021-22 budget report, by £2,487,000 in 2021-22 and £5,475,000 in 2022-23.

Recommended decisions

For the London Fire Commissioner

1. That the London Fire Commissioner ends the current recruitment freeze and recommences Firefighter Development training at LFB, with an intake of 84 candidates this year at a cost of £681,607 in 2020/21 and 288 candidates per year from 2022/23 at a cost of £2,337,000.
2. That additionally, the London Fire Commissioner agrees there will be a focus on attracting transferees from other FRS via a recruitment process; to be considered after initial TFF intake and dependent on skills and numbers required.

Introduction and Background

1. In light of the London Fire Brigade (LFB) residual budget gap of £5,900,000 in 2021-22, increasing to £14,700,000 in 2022-23, an operational recruitment freeze was proposed for two years, from April 2021 to March 2023. This was included in LFB's November 2020 Budget Submission to the Mayor (LFC-0432) and the March 2021-22 Budget Report (LFC-0505x).
2. The recruitment freeze for operational staff set out to result in total reductions in operational staff spend of £14,700,000 over two years, based on a start date of April 2021. The implications of this on operational response are set out later in this report.
3. This assumption was based on the fact that the savings from any recruitment freeze would not be offset through the use of additional overtime, and that staff shortages at stations and potential crewing shortages would not be fixed through the use of pre-arranged overtime (PAO). However, the actual shortfalls have been greater than anticipated in areas such as Covid-19 sickness, self-isolation and support for the Ambulance Driver Assistance programme. This has generated additional demand on PAO on top of the recruitment freeze.
4. Maintaining the recruitment freeze would therefore result in an average operational workforce reduction of 108 staff in 2021-22 and 296 staff in 2022-23. This can be seen in the context of other previous operational vacancy levels of 238 in January 2018 and 229 in December 2013. This would potentially lead to nine pumping appliances becoming unavailable for operational response ("off the run") in 2021-22 and 25 in 2022-23.
5. The impact on vacancies has been closely monitored, and LFB's People Services department has been producing a range of forecasting scenarios to understand the impact on operational vacancies over the next two to three years.
6. In addition to this, the pension remedy that will be required following the successful discrimination claim (McCloud/Sargeant) by the FBU, in connection with the transitional arrangements applicable to the 2015 Firefighters Pension Scheme, is expected to take effect from 31 March 2022 and may potentially result in a significant number of employees retiring from the organisation. It should also be noted that this exceptional retirement profile will be weighted with staff holding specialist skills and more senior ranks within the Brigade, a full breakdown of skills and ranks has been constructed by Central Operations and People Services. With the addition of the pension remedy impact, the average vacancies for 2021-22 would increase to 165 compared to normal leaver rates of 108; and for 2022-23 would increase to 635 compared to normal leaver rates of 296 (alongside the continued recruitment freeze).
7. As a result of the decision to freeze recruitment, the last firefighter course in the programmed set of courses started on 26 April 2021 and these trainees have now been posted to station. There were a further 16 trainees who had been paused on their training process. These are undertaking training through July to November and all will be posted by November 2021.
8. In light of further information regarding the overall budget forecast and the impact of the McCloud/Sargeant case, the Brigade has reviewed the impact of the recruitment freeze against potential savings, to maintain the future operational establishment.

9. This report, therefore, recommends ending the current recruitment freeze and recommencing FFD training from January 2022, with 84 candidates this year and at a full intake of 288 candidates per year thereafter. If this recommendation is agreed, it is forecast that savings would still be achieved in excess of those set out in the 2021-22 budget report, by £2,487,000 in 2021-2022 and £5,475,000 in 2022-2023. If recruitment was maintained there would then be a shortfall in achieving the £14,700,000 reduction in the 2023-24 financial year of £3,112,000, which would be considered as part of the budget process. Retirement and recruitment rates will be monitored closely by LFB, and if retirement rates are lower than expected and savings will be impacted, recruitment may be slowed down or paused.
10. The report also recommends focusing on attracting transferees from other fire and rescue services (FRSs), if agreed and 50 transferees were to be employed from June 2022 this could result in underachieving the savings set out in the 2021-22 budget report by £2,117,000 in 2022-23 and £2,841,000 in 2023-24. Recruitment of any transferees will therefore be monitored and controlled to ensure they do not negatively impact the budget position.
11. Additional detailed information on the Financial Impact can be found from paragraph 32 of this report.

Establishment impact

12. Table 1 below outlines the potential impact to the operational establishment over the next three years because of the recruitment freeze and pension remedy.
13. This is based on total operational vacancies. Station vacancies will be higher than non-station vacancies. The vacancies are set against the known establishment at this time with no future changes e.g. budget adjustments, assumed.
14. The retirements forecast due to the pension remedy is based on 578 employees being eligible to retire between 1 April 2021 and 31 March 2022 (those staff having 25 years' service, aged 50 and having been employed as at 31 March 2012 in any FRS). The forecast works to an assumption of between 70% and 80% of this group retiring during or at the end of 2021/2022. The figures in this report are based on the higher rate of 80% and therefore are at the maximum of what the Brigade would expect to occur.
15. It is of course challenging to predict how many people will choose to retire. In addition, the Brigade may see the spread of retirements extending beyond 31 March 2022.
16. Within the group of 578 employees, 188 have full protection under the 1992 Firefighters' Pension scheme. The remaining 393 employees were affected by the transitional arrangements to the 2015 scheme. This may therefore impact on the retirement patterns that evolve for each group although it is difficult to assess exactly how this may look. This will also be affected by the decision around Immediate Detriment.
17. There are a small number of employees, approximately 40, who become eligible for retirement under the current criteria but between 1 April 2022 and October 2023 (the date by which the provisions are due to be implemented). The impact on vacancies will be minimal as the retirements will be over an 18 months period and therefore can be built into standard retirement forecasts.

Table 1: Vacancy forecast to March 2024 with current recruitment freeze to March 2023 and pension remedy impact at March 2022

As at quarter	Vacancies
Jun 2021	-78
Sep 2021	-123
Dec 2021	-178
Mar 2022	-566
Jun 2022	-599
Sep 2022	-629
Dec 2022	-660
Mar 2023	-693
Jun 2023	-714
Sep 2023	-663
Dec 2023	-624
Mar 2024	-597

18. Alongside the impact on overall vacancies, Establishment Board has also been discussing the wider impact of the pension remedy on the organisation, in particular for senior roles, and the flight risk to other FRS due to the national impact of the remedy and other FRS also looking to fill large numbers of vacancies. This work will form part of the deep dive on the succession / workforce planning risk which is currently being developed.
19. LFB requires a minimum of 746 staff on duty for each shift, at fire stations, in order to maintain all pumping and specialist appliances on the run. In order to achieve this and also enable suitable safety critical training and exercising, other unplanned release for activities such as staff medicals and fitness tests along with the planned uptake of leave and forecast sickness levels, LFB employs 1106 members of staff on each shift.
20. The current vacancy levels are impacting LFB's ability to maintain all pumping and specialist appliances which is being managed in line with guidance for duty officers to ensure resources are targeted in an efficient and consistent manner. As set out in Paragraph 1.4 the impact of this, allied with firefighters not being available for reasons connected to Covid-19, has been greater than expected and hence has been mitigated each shift via the use of PAO, although the sustainability of this mitigation is beginning to become an issue due to decreasing appetite for voluntary PAO within the workforce. The continued recruitment freeze along with the increasing impact of the upcoming pension remedy will increase the impact the vacancy margin has on all areas of LFB's service outlined above, amplified by the impact the pension remedy has on higher ranked and higher skilled officers and firefighters.
21. At this stage, a decision to re-start recruitment will still see a continued challenge to LFBs establishment and skills management due to the lead in time to recruit new firefighters and also the time taken for these firefighters to acquire the specialist skills required. This

acquisition of specialist skills, such as Motor Driver, Fire Rescue Unit and Command Unit qualifications can take years and is, ordinarily undertaken following completion of the necessary core skills development. The blended and coordinated approach of FF(d) recruitment and transferee recruitment will go some way to reduce the impact here.

Diversity impact

22. Furthermore, People Services have also modelled the impact on diversity should the recruitment freeze remain in place. Over the last few years, significant progress has been made to increase the diversity of new recruits. This has resulted in an increase of 1.74% in the number of female operational staff, 1.15% of Black, Asian and Minority Ethnic staff and 0.84% of LGB staff between 1 January 2019 and May 2021. This trend was expected to continue year on year.
23. Table 2 shows the potential impact on diversity with and without recruitment, and demonstrates that continuing with the recruitment freeze is likely to stall progress on improving the diversity of new recruits.

Table 2: *Impact on diversity (lifted from the People Services Performance Report Q4 2020-21)*

	Women	Black, Asian and Minority Ethnic	Disabled	LGB
March 2019	7.4%	13.1%	5.5%	4.8%
March 2020	8.0%	13.4%	6.0%	5.1%
March 2021	8.9%	14.4%	6.2%	5.5%
March 2022 with recruitment	9.9%	15.5%	5.9%	5.7%
<i>March 2022 without recruitment</i>	<i>9.1%</i>	<i>14.4%</i>	<i>5.9%</i>	<i>5.5%</i>
March 2023 with recruitment	10.7%	16.5%	5.7%	6.0%
<i>March 2023 without recruitment</i>	<i>9.2%</i>	<i>14.5%</i>	<i>5.7%</i>	<i>5.6%</i>

Skills and officer impact

24. The firefighter recruitment freeze will further impact on future driver skills levels. Whilst new firefighters are contractually required to become drivers, the link between fulfilling this element of their contract and achieving competence in role and competent rate of pay was removed in 2019.
25. Additionally there are a range of specialist skills held by relatively small proportions of the workforce which will be disproportionately impacted by the pension remedy, exaggerated by the recruitment freeze. For example, Fire Rescue Unit (FRU) full establishment is 932 with a forecast of 88 retirements on or before the pension remedy – a 9.4% loss, this is on top of an existing 20.8% skills gap in FRU.
26. This picture is repeated at officer ranks with the more senior officer ranks more significantly impacted.

27. It should be noted that restarting firefighter recruitment will not immediately positively impact on skills and officer numbers. Options 1 and 2 will be a longer-term solution to maintaining levels, therefore there needs to be an approach to mitigate the immediate shortfalls, as shown in Option 3. The draft Recruitment Strategy includes detail on the recruitment of transferees from other FRS to meet skills gaps and officer vacancies.

Recommended option

28. Following consideration of Option 1 below and the further options set out in Alternative Options Considered (30.), both People Board and Commissioner's Board concluded that Option 1 presented, on balance, the preferred option with which to move forward, to help mitigate the impact of the recruitment freeze on the operational establishment (including the impact of the pension remedy), diversity, and future skills levels. In addition, Option 1 still ensures LFB meets (and exceeds) the savings target for 2021/22 and 2022/23.

Option 1: To recommence FF(D) training from November 2021. To utilise an existing pool of candidates from previous Outreach work to populate courses in November and December 2021 and to launch a new recruitment process in Autumn 2021 to populate FF(D) courses from January 2022, alongside a focus on attracting transferees from other FRS.	
Benefits	Risks/Issues
Start to fill firefighter vacancies earlier, maintaining future throughput with vacancies reaching 333 in March 2023, reducing to 177 in March 2024 (see Table 3)	Insufficient time to put in place all the recommendations from the FF(D) review, lead-in time required for Babcock to implement changes, as highlighted in corporate risk P1. However, some immediate changes have already been made to mitigate the risks identified in the FF(D) review
Training courses remain scheduled as planned with Babcock for the remainder of 2021	Lack of lead in time for successful Outreach work, however this is mitigated somewhat by the outreach team having maintained talent pools
Savings target is exceeded in 2021/22 by £1.3m, with £7.2m savings against the target of 5.9m. In 2022/23 the savings target would be exceeded by £3.3m, at £18m compared to £14.7m (see Table 4)	Insufficient time to review and implement eligibility criteria and assessment standards, including LGV/medicals
Candidates from the existing recruitment pool allocated to earlier courses in 2021, will allow training and recruitment resources to remain in place and skilled, as well as completing the 2019 campaign	Firefighter recruitment is due to be reviewed to ensure assessment criteria/ability tests remained current. An earlier start date than April may not give sufficient time to do this and implement, although assessment team resource has been secured. This is due for completion in October 2021

	Due to the recruitment freeze impacts on Babcock, they require notice as soon as possible to secure trainer resources
	Due to the recruitment freeze, the number of Fitness Advisors has reduced and there is not currently capacity to run fitness tests for new FF alongside the RPMs which have restarted. To mitigate this, two FF will be required on secondment from September 2021 onwards.

Transferees

29. In addition to Option 1 it is recommended that a focus is given to attracting transferees from other FRS. Transferee processes at FF rank have taken place on an ad hoc basis in previous years where there has been a demand for higher intake numbers but has not been done on a regular basis alongside each TFF process.
30. It is recognised there are challenges with transferee processes, based on previous outcomes, including a potential lack of diversity and high fallout rates during the process. A review of the transferee process and the conversion course is required to make this route successful. Currently there is two-week conversion course in place for transferees at this level. There may also be a challenge in securing this course provision from Babcock given the current priorities of the training course schedule.
31. In the two 2017 firefighter transferee rounds, one campaign had a success rate of 24% and the other only 15%, from an applicant list of around 150 each time. The main drop-out stage is at online tests, 32-47% failed here (see Appendix 1). This data should inform how we approach a new transferee process, including selection, to ensure it delivers the numbers we need. An equality impact assessment is due to be run for the online tests to ensure no negative impact on under-represented groups.
32. Therefore any new process must respond to these challenges and ensure that the benefits of working for LFB are promoted to attract good quality candidates, especially at a time when other FRS will be looking to recruit new staff due to the pension remedy impact. Anecdotal evidence suggests that non-LFB FRS staff view and consider LFB to be an employer of choice.

Alternative Options Considered

33. Whilst Option 1 has been identified as the preferred option, there is clearly a balance to be struck between the benefits and risks of each option. The following options were considered by People Board and Commissioner's Board. The increasing number of vacancies and potential impact of the pension remedy in March 2022 informed the preferred decision of Option 1.

Option 2: Start TFF recruitment in April 2022 at the full intake of 288 a year, alongside a focus on attracting transferees from other FRS	
Benefits	Risks
Better lead in time for Outreach to successfully target hard to reach groups and work with partnerships to increase diversity intake	Higher vacancies for a longer period reaching 465 in March 2023 and reducing to 309 by March 2024 (see Table 3)
Recommendations from FF(D) review will be underway and/or complete	Later intake impacts on increasing MD skills shortage
Greater certainty that courses will be filled to maximum numbers as there will be a longer lead in time to recruit and assess, creating a talent pool to feed through to course allocation	Babcock have a cohort of employed trainers who they will need to redeploy or potentially make redundant if the Fire Fighter Development Programme is not run for a considerable length of time. Currently it is still undertaking "mop up" courses for the people previously recruited but the last of these will be running in July and September. This may lead to skills gap once recruitment starts again if there is a significant time lapse in between
Further savings are created of £8.7m, or £2.8m above the target savings of £5.9m in 2021/22. In 2022/23 the savings would be £24.5, £9.8m above the target of £14.7m (see Table 4)	Due to the recruitment freeze, the number of Fitness Advisors has reduced and there is not currently capacity to run fitness tests for new FF alongside the RPMs which have restarted. To mitigate this, two FFs will be required on secondment from January 2022 onwards.
	Securing transferee courses from Babcock alongside the current course scheduling priorities

Option 3 – Specific transferee intake in January 2022 with trainee intake commencing in April 2022

Detail: Commence targeted external transferee recruitment in 2021 for Firefighters holding "in demand" skills such as MD, FRU etc. as well as a policy decision to make all of our promotional processes for all ranks open to external applicants with consideration taken for applicants already competent in the rank being applied for.

Review of the FFD course and associated development pathways for trainee firefighters to run concurrently with this work to re-commence FFD recruitment from April 2022 with a refreshed development pathway for trainees.

Option 3 assumes an intake of 200 transferees in January 2022.

Benefits	Risks
Intake of competent firefighters with the requisite skills including driving	Intake will draw from other FRS who are also affected by the pension remedy and the need to maintain establishment
Faster process from hire to station posting	A significant intake would need to be achieved to make this a success and meet the MD shortfalls. Previous transferee rounds have not been lucrative. See paragraph 28
Faster reduction of vacancies, with vacancies forecast to be at 265 by March 2023 and 109 at March 2024	A review of the transferee process and the conversion course is required prior to recruitment.
	Ability to secure transferee conversion courses from Babcock alongside the current course scheduling priorities.
	Savings target is not achieved. In 2021/22, savings would be £4.5m against the target of £5.9m. In 2022/23 this would be £14.4m against the target of £14.7m
	Achieving 200 transferees from other FRS during a period where all FRS will see high numbers of retirements could be challenging based on success rates from previous campaigns

Option 4 - 'Do nothing': Continue the recruitment freeze as planned until March 2023	
Benefits	Risks
Better lead in time for Outreach to successfully target hard to reach groups and work with partnerships to increase diversity intake	Higher vacancies for longer period, with vacancies reaching 693 by March 2023 and at 597 by March 2024 (see Table 3)
Recommendations from FF(D) review will be underway and/or complete	Later intake impacts on increasing MD skills shortage
Greater certainty that courses will be filled to maximum numbers as there will be a longer lead in time to recruit and assess, creating a talent pool to feed through to course allocation	Lack of progress on improving the diversity of our workforce

Savings target is exceeded in 2021/22, being £2.8m in excess of the target based on savings of £8.7m against the target of £5.9m in 2021/22. In 2022/23 the savings are forecast at £32.2m against the target of £14.7m	Babcock have a cohort of employed trainers who they will need to redeploy or potentially make redundant if the Fire Fighter Development Programme is not run for a considerable length of time. Currently it is still undertaking "mop up" courses for the people previously recruited but the last of these will be running in July and September. This may lead to skills gap once recruitment starts again if there is a significant time lapse in between
No need to expand the Fitness Advisor team	
Maximum opportunity to review the recruitment process	

Impact of options on vacancy levels

34. For each of the options, forecasting was undertaken to identify the impact on operational vacancies. The forecasting includes the potential impact of the pension remedy in March 2022.

Table 3:

	Option 1 Recruitment commence: November 2021 with full intake	Option 2 Recruitment commence: April 2022 with full intake	Option 3 Recruitment commence: April 2022 with full intake and transferee round of 200 in 2021	Option 4 Continued recruitment freeze to March 2023
Jun 2021	-78	-78	-78	-78
Sep 2021	-123	-123	-123	-123
Dec 2021	-178	-178	-178	-178
Mar 2022	-506	-566	-366	-566
Jun 2022	-455	-587	-387	-599
Sep 2022	-413	-545	-345	-629
Dec 2022	-360	-492	-292	-660

Mar 2023	-333	-465	-265	-693
Jun 2023	-294	-426	-226	-714
Sep 2023	-243	-375	-175	-663
Dec 2023	-204	-336	-136	-624
Mar 2024	-177	-309	-109	-597

Financial Impact

35. The financial impact of each of the three options in the report, along with the impact of no change, have been modelled and are set out in the tables below.
36. The below tables set out a summary of each of the three options against the current budgeted option. It should be noted that the 2021/22 Budget Report only covered the 2021/22 and 2022/23 financial years, for the purposes of this comparison it has been assumed that the expected vacancy levels and saving in 2022/23 are maintained into 2023/24.
37. Table 4 shows the assumed number of average vacancies resulting from each option and the potential financial saving against the full establishment position. The table also shows the base vacancy margin assumption that has been used to calculate the budget in previous years.

Table 4

Financial Year		2021/22	2022/23	2023/24
Base Vacancy Assumptions (2020/21)	AVM	31	31	31
	Saving (£m)	1.6	1.6	1.6
2021/22 Budget Report	AVM	108	296	296
	Saving (£m)	5.9	14.7	14.7
Maintain Recruitment Freeze (£m) (Option 4)	AVM	165	635	659
	Saving (£m)	8.7	32.2	30.4
Option 1 (restart in Nov 21)	AVM	156	402	243
	Saving (£m)	7.2	18	10.1
Option 2 (restart in Apr 22)	AVM	165	530	375
	Saving (£m)	8.7	24.5	16.8
Option 3 (restart in Apr 22 with 200 transferees from Jan 2022)	AVM	82	330	175
	Saving (£m)	4.5	14.4	6.6

38. Table 5 below then shows what difference each option will have against current budget assumptions. This shows that under Options 1 and 2 savings will exceed the current target in the first two years, with Option 3 showing a financial pressure in each year. Maintaining the recruitment freeze without agreeing further recruitment would result in an additional estimated underspend of £2.8m in 2021/22, increasing to £17.5m in 2022/23 and £15.7m in 2023/24.

Table 5

Financial Year	Maintain Recruitment Freeze (£m)	Option 1 (£m)	Option 2 (£m)	Option 3 (£m)
2021/22	2.8	1.3	2.8	(1.4)
2022/23	17.5	3.3	9.8	(0.3)
2023/24	15.7	(4.6)	2.1	(8.1)

39. The financial impacts set out here assume that no additional operational overtime is incurred beyond current levels. However, if vacancy levels increase above the position as set out in the 2021/22 Budget Report, additional overtime may be required, offsetting any additional overspend.
40. It should be noted that the figures here also include the financial cost of an increase in trainee numbers as well as the impact on the development margin. These figures also include a high leaver rate forecast, and any change to this leaver rate incurred in practice would have financial implications.

Pre-arranged Overtime impact of ongoing recruitment freeze

41. The normal AVM is £1.6m, which would equate to 31 firefighter posts. The AVM is set at a fixed amount, so inflation means that the impact of this has been reducing in real terms over time. Based on the budgeted AVM level for 2021/22 this would mean that if the recruitment freeze is maintained the organisation would be 57 above the budgeted AVM for the year. If PAO was used to fill all these vacancies this would represent a cost of £4.0m. In 2022/23 the forecast is 339 above the budgeted AVM for that year which would represent a cost of £23.9m for PAO to fill all the vacancies above the budgeted AVM.
42. However, the organisational approach would not look to cover all vacancies with PAO and therefore this cost should be seen as a high-level guide only. It is not possible to provide a fixed figure on what the degradation and vacancies may look like over the period in question, dependent on a range of factors such as planned & unplanned staff absence. Therefore, the PAO figures quoted should be seen as purely high-level figures only. Whilst we seek to maintain fire cover (appliances available) at all times this is measured against our response targets of 6, 8, 10 and 12 minutes, not against numbers of pumps off the run.

Further considerations

43. There are approximately 42 candidates still in the recruitment process from the previous campaigns who are still required to undertake work related tests and medicals; therefore, the number may reduce.
44. Consideration needs to be taken in producing a detailed marketing plan for roles within the Brigade and in this instance creating a future talent pool for firefighter. Recruitment, Outreach and Communications have previously worked well together to produce campaigns such as 'protecting the future of others' and data analytics to learn from and improve our website and accessibility to information, as highlighted in the Kaizen and Future Thinking research into the barriers to becoming a firefighter.

45. The Brigade should therefore harness this collaboration, producing a detailed marketing and communications plan to reach out to new and existing firefighters. This plan will be presented to the People Board in the Autumn as it will require research, resourcing, and budget. This new approach may therefore be available from early 2022 to feed into the recruitment process.
46. A review of firefighter assessments needs to be conducted in conjunction with the NFCC People Programme and Apprenticeship Standards to set the standard required for entry. This will be varied and will potentially include reintroducing LGV requirements to assist in the longer-term maintenance of driver skills.
47. For MD gaps we are looking at 139 potentially from the pension remedy impact and 160 from those being promoted to Leading Firefighter (if all were MD). To secure replacements for all these via the transferee process we would have to achieve 1000 applicants to gain the 200 successful candidates needed, based on the 2017 outcomes. These candidates will also need to have the right skills. A detailed breakdown of the 2017 rounds can be found in Appendix 1.

Future target operating model

48. Resource modelling indicates that it should be possible to manage the impacts of the vacancies in the short term so that the Brigade can continue to achieve the London-wide attendance standards as set out in the London Safety Plan. Longer term sustainable proposals to manage the impacts will need to be addressed as part of the next integrated risk management plan, which will need to consider our ability to undertake core activities within the context of the changing risk profile of London.

Equality Impact

49. 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 exercising our functions and taking decisions.
50. 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.
51. The protected characteristics are: Age, Disability, Gender reassignment, Pregnancy and maternity, Marriage and civil partnership (but only in respect of the requirements to have due regard to the need to eliminate discrimination), Race (ethnic or national origins, colour or nationality), Religion or belief (including lack of belief), Sex, and Sexual orientation.
52. The Public Sector Equality Duty requires us, in the exercise of all LFC functions (i.e. everything the LFC does), 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.

53. Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:
- 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.
54. The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include steps to take account of disabled persons' disabilities.
55. Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:
- (a) tackle prejudice, and
 - (b) promote understanding.

50. The equality impact assessment (EIA) for the overarching proposal will need to factor in all of the required elements detailed in paragraphs 12 to 20 and the pool of people affected in each of these areas. Appendix 2 details an initial EIA that has been compiled in consideration of the proposals within this report, however this will be a living document that will evolve over the life cycle of the recruitment freeze and the introduction of a potential restart option.

Finance comments

56. The 2021-22 Budget Report included a saving of £5,900,000 in 2021-22, increasing to £14,700,000 in 2022-23, because of the recruitment freeze. The report notes that if no additional recruitment action is taken significant increases in vacancy rates are forecast for 2022-23. This could result in reduced salary costs offset by a material increase in overtime.
57. This report recommends ending the current recruitment freeze and to recommence FFD training from January 2022 at a cost of £681,697 for 84 candidates. For 2022-23, this will be a full intake of 288 candidates at a cost of £2,337,000. If this recommendation is agreed it is forecast that savings would still be achieved in excess of those set out in the 2021-22 budget report, by £2,487,000 in 2021-22 and £5,475,000 in 2022-23. If recruitment was maintained there would then be a shortfall in achieving the £14,700,000 reduction in the 2023-24 financial year of £3,112,000. Any variance to the forecast operational spends in 2021-22 will be considered as part of the budget process and incorporated into the financial position reporting. The impact of any changes to the vacancy forecasts for future years will be considered as part of the budget process.
58. The report also recommends focusing on attracting transferees from other FRSs. If agreed this could result in under achieving the savings set out in the 2021-22 budget report by £2,117,000

in 2022-23 and £2,841,000 in 2023-24. Recruitment of any transferees will therefore be monitored and controlled to ensure they do not impact the budget position.

Legal comments

59. Under section 9 of the Policing and Crime Act 2017, the London Fire Commissioner (the "Commissioner") is established as a corporation sole with the Mayor appointing the occupant of that office. Under section 327D of the GLA Act 1999, as amended by the Policing and Crime Act 2017, the Mayor may issue to the Commissioner specific or general directions as to the manner in which the holder of that office is to exercise his or her functions.
60. Section 1 of the Fire and Rescue Services Act (FRSA) 2004 states that the Commissioner is the fire and rescue authority for Greater London.
61. The report recommends expenditure exceeding £150k in order to end the current recruitment freeze and to recommence FF(D) training from November 2021 at a full intake of 288 candidates per year.
62. 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").
63. Paragraph (b) of Part 2 of the said direction requires the Commissioner to seek the prior approval of the Deputy Mayor before "[a] commitment to expenditure (capital or revenue) of £150,000 or above as identified in accordance with normal accounting practices...". The decision to undertake the proposed recruitment exercise at a value that exceeds £150,000, will accordingly require prior approval from the Deputy Mayor.
64. The statutory basis for the actions proposed in this report is provided by section 7(2)(a) of the Fire and Rescue Services Act 2004, under which the Commissioner must secure the provision of personnel, services and equipment necessary to efficiently meet all normal requirements for firefighting. Furthermore, under section 7 (2)(b) of the aforementioned Act the Commissioner must secure the provision of training for personnel.
65. The General Counsel notes that the LFC has a contract with Babcock Training Limited dated 28th February 2018 for the provision of training and as such FFD courses shall be conducted in accordance with the terms of that contract.

List of Appendices

Appendix	Title	Protective Marking
1.	Breakdown of 2017 transferee rounds	None
2.	EIA	None

APPENDIX 1

Outcome of 2017 transferee rounds

Campaign 1 2017

Outcome	Count	%
Did not complete Apollo assessments (online tests)	10	7%
DNA	7	5%
Failed Apollo assessments (online tests)	67	47%
Failed interview	8	6%
Not eligible - did not complete EFAD	13	9%
Not eligible - Retained	3	2%
Successful	22	15%
Unsuccessful at medical	2	1%
WD	7	5%
WD after interview	3	2%
Grand Total	142	

Diversity outcomes - 22 white male, 4 LGB

Campaign 2 2017

Outcome	Count	%
Did not complete BSQ and SJT (online tests)	10	6%
DNA	22	14%
Failed BSQ or SJT (online tests)	51	32%
Failed interview	17	11%
Not eligible post-interview after having confirmation from current service	3	2%
Successful	37	24%
WD after interview stage	13	8%
WD/Not eligible	4	3%
Grand Total	157	

Diversity outcomes - 32 white male, 2 Black, Asian and Minority Ethnic male, 3 white females