

Equalities Impact Assessment

Integrated Risk Management Plan 2020 - 2025

An Equalities Impact Assessment or EqIA involves analysing the effect, or potential effect, of the way we do our business upon groups that share protected characteristics as defined in the Equality Act 2010.

This requires us to look at the equality data which we capture or have access to and to consider the outcome of our community engagement. We need to assess whether our policies and practices show “due regard” for the three aims of the Public Sector Equality Duty (PSED) listed below.

The analysis should highlight effects that increase equality, decrease equality, or have no impact upon equality across the protected characteristics. Its purpose is not just to paint a picture, but to identify practical steps to improve our performance by:

- a) Eliminating any unlawful discrimination,
- b) Advancing equality of opportunity and
- c) Fostering good relations between different groups.

The equality statement for this assessment:

Clearly explain and provide supporting evidence to show how the policy/activity satisfies the three aims of the Public Sector Equality Duty (PSED) and DOES NOT cause or have the potential to cause a NEGATIVE (detrimental) effect:

The ESFRS Integrated Risk Management Plan (IRMP) 2020 – 2025 addresses the need for transformational change within East Sussex Fire & Rescue Service (ESFRS). East Sussex Fire Authority (ESFA) and ESFRS have consulted widely on their proposals for change within the “Planning for a Safer Future” IRMP and is responding with a wide-ranging change programme linking in seamlessly with our new Leadership Framework, Inspection Improvement Plan and improvements to Protection Services through the outcomes of both the Hackett Review and independent review into the Grenfell Tower fire. These significant challenges require a workforce which can respond positively to deliver the changes needed.

The role of ESFRS in an environment brought about by the Policing and Crime Act 2016, has implications for professional development, well-being, and organisational culture. The IRMP Implementation Plan which this EqIA supports, will seek to advance cultural change through individual leadership skills required by all members of the organisation during each phase of definition, design and delivery, attracting a diversity of thought and knowledge. Within the IRMP Implementation Plan, seven key workstreams have been identified to help define and plan improvements:

1. Ensure the provision of 18 frontline fire appliances before demand/ at the start of each day
2. Introduce changes to our current 2-Watch Wholetime Day-crewed duty system including a one-Watch, flexible rostering/variable crewing system at 7 Stations including the reclassified fire station at The Ridge in Hastings and 5-day week at Battle Fire Station
3. Remove seven low-activity fire appliances designated as PAPA4 from six Day-crewed and one On-call stations whilst re-introducing 3 operational spares at Battle, Newhaven and Crowborough
4. Implement changes across the two Hastings fire stations including the introduction of an additional frontline fire appliance designated PAPA2 at Bohemia Road and the reclassification of The Ridge fire station from a 4-Watch 24/7 to the new-look one-Watch Day-crewed duty system
5. Complete a review of Specialist appliances and teams including a “Shared” Crewing Policy for specialist appliances exclusive of two Aerial appliances at Preston Circus and Bohemia Road Fire Stations

6. Withdraw extant IRMP decisions from 2013 and extant SLT decisions from 2018 and implement robust demand management plans and;
7. Implement a “Group Crewing” system to improve the efficient use of our resources at the three fire stations across the City of Brighton and Hove.

The 2020 – 2025 IRMP, through its identified improvements will also seek to:

- Strengthen Leadership and Line Management to support organisational change and improved community outcomes
- Developing cultural values and behaviours which make the Fire & Rescue Service a great place to work for all our people
- Ways of working that are able to respond to service needs
- Provide excellent training and education to ensure continuous improvement of services to the public
- Continue to support the Health and Well-being of all our people
- Strengthen our ability to provide good service by diversifying our staff and creating a fair & equal place to work

The definition and design stages for each of these detailed individual work programmes, as they are built, will identify the provision of inclusivity that overtly demonstrates:

- A compelling vision, taking people with them
- Leading across boundaries
- Utilising high levels of emotional intelligence in order to influence a shared mission or goal
- Being in the present, but horizon scanning for the future
- Promoting and developing distributed leadership
- Acting as an advocate for learning through practice whilst creating and sustaining a learning environment
- Embracing diversity, innovation and being open to alternative views
- Demonstrating and promoting compassion for self and others, with a focus on improvement and accountability

As such, the areas that are surfaced through this overarching EqIA will ensure that developed programs for change can demonstrate due regard to the elimination of any unlawful discrimination, advancing equality of opportunity and fostering good relations between different groups as is required.

The IRMP Strategic Implementation Board and the work within the implementation plan will be monitored and evidenced against its 7 overarching objectives and the characteristics protected under the Equality Act 2010, as applicable.

- a. There will be a blended learning approach to ensure learning needs are met
- b. **Involvement from a range of stakeholders is crucial as it is a proven principle that people tend to support what they create. Co-production throughout the definition and design phase will be key to embedding and facilitating continuous improvement.**
- c. Working with and learning from partners who have a proven track record in leading organisational/transformational change will be also be vital

Who?

This EqIA has been constructed by an Officer attached to the Operational Response Review on behalf of the Strategic Project Sponsor, the Deputy Chief Fire Officer. The intention of this EqIA as outlined above is to establish any serious impacts across all 7 proposals that would present a barrier of such significance to render the proposal(s) unfeasible for ESFRS to implement.

Far more detailed and individual People Impact Assessments that additionally assess the impact of equality in regard to the 9 protected characteristics on any member of staff or customers that the change suggests, will be completed by delegated leaders within the existing ESFRS network of Action Learning Sets.

The modified proposals/ Combined Fire Authority IRMP decisions affect all ESFRS Firefighter to Watch Manager (inclusive) roles and the community they serve regardless of the PC's.

Negative impacts on any protected characteristic?

As planned, the draft IRMP communications plan supported by its own separate EqIA enabled the most productive set of IRMP returns ESFRS has ever received. At this time there is little evidence, emerging or otherwise that shows that there are any negative impacts on any of the 9 PC's other than what the initial and subsequent revisions of the overarching EqIA found:

1. Disability: In effective communication of change to staff/ customers with a neurodisability. The ORR Communications Plan took account of this and the new IRMP Implementation Communications Plan will need to repeat and improve this and; Employees who are the primary Carers for their family may be disadvantaged during the short to medium term of a new duty system resulting from being part of an institutionalised workforce having to make alternative care arrangements for disabled family (members of the community) at some considerable expense.
2. Gender: In disadvantaging female members of staff who may be adversely affected by the changes to Wholetime duty systems based on the national statistic that 70% of all carers are female. Greater analysis of this noting the modified proposal to NOT include the changes to 24/7 "Shift" stations is necessary as the impact still exists for existing female Firefighter – Watch Manager inclusive who work at any one of the Stations impacted by a change to the Day-crewed duty system (DCDS). Wholetime female FF-WM's on or wishing to transfer to a DC Station must be individually assessed to establish the impacts of change.

Notwithstanding this, the full analysis of the IRMP consultation process is being included within the Combined Fire Authority report noting that there have been a number of counters to the original draft proposals and any equalities data that has arisen has been assessed.

Positive impacts on a protected characteristic?

How do any of the 7 main proposals positively affect staff or fire and rescue service customers?

1. ORP – This increases the number and spread of immediately available frontline fire engines across the County from 15 to 18, improving cover to deal with fire and rescue related emergencies being experienced by any of our customers, including those with any of the 9 PC's. Fact identified within ORR Main Report published 2020.
2. Flexible Resourcing Pool – The introduction of the FRP will present the opportunity for any existing staff and newly transferred in to consider the flexible nature of this crewing system as a positive lifestyle choice fitting in with Age (as our workforce profile increases) and gender (Carers) and other underrepresented groups. However, greater research and analysis for this is required to establish the veracity of this claim during and when implemented.
3. Enhancements to On-call duty systems - This will require greater recruitment, some of whom may have been disadvantaged by the inflexibility of the extant RDS and contracts. Greater/ongoing monitoring and analysis of this claim is required.
4. DCDS – A flexible rostering or variable crewing system may be attractive to underrepresented groups/carers regardless of gender/gender assignment. Greater research and analysis for this is required.

5. DODS - A Day-only duty system may be attractive to underrepresented groups. Greater research and analysis for this is required.

Findings & effects?

At this time, there still remains two PC's which require the ESFA and ESFRS to maintain cognisance of with regards to the definition and design of future policy and ways of working should the CFA choose to implement ANY changes (disclosed neurodisability requiring better, specific means for communicating change and alleviating anxiety), and gender with regards to duty systems at Day-crewed Stations. As more detailed information from the consultation process emerges, it will be analysed within a revised EqIA. Below is the headline data currently available from consultations dealt with in-house (See attached appendix infographic):

- 177 Stakeholder Groups contacted
- 156 of these overtly E&D specific with no specific observations in relation to the 9 PC's
- 87 Business contacts
- 70 Emergency Services
- 7 Local education establishments
- 13 VIP's/ MP's etc.
- Libraries left out due to CIVID restrictions
- 86 Parish Councils
- 137 Councillors and Administrative support
- 799 Survey responses – (refer to infographic)
- 498 Email responses
- 21 Telephone responses
- 69 registrations of interest to the Stakeholder webinar – 38 attended (04/06/20)
- 26 paper copy requests (postal)
- 31 staff questions
- 3 local engagement with town council

Media/ Social media will be reported more fully at a later stage but includes:

- Several press-releases/ newspaper articles/ PO interviews
- Several social media responses/interaction etc.

Other outcomes so far:

- All staff who may be placed at risk of a move from their current workplace or role will be treated equitably and within the processes identified in current ESFRS HR Policies
- Over 65s over-represented in the responses - about 60% more than one would expect which was pleasing to see, as some of our targeting methods were to our more elderly households
- Potential negative impact under Disability and Gender remains valid with amended proposals. However it is subject to the implementation of a planned and proactive communication and training strategy to control adverse impacts on disabled staff or customers, and female primary carers. This must ensure that any member of staff or customer, particularly individuals with a neurodiverse condition or those who perform the role of primary carer have every opportunity to be informed of changes and the personal options open to them.

This EIA will continue to be reviewed with relevant stakeholders and any matters arising will be recorded for action in consideration of any existing, new or emerging data.

Outcomes of an assessment

There are three, more than one of which may apply to a single policy or practice:

- **Outcome 1: No major change**

The assessment demonstrates the policy is robust; there is no potential for discrimination or adverse impact and all opportunities to promote equality have been taken.

- **Outcome 2: Adjust the policy, practice, procedure or plan**

The assessment identifies potential problems or missed opportunities whereby the policy or practice needs to be adjusted in order to remove barriers or better promote equality.

- **Outcome 3: Stop and remove the policy, practice, procedure or plan**

The policy or practice shows actual or potential unlawful discrimination. It must be stopped and removed or changed.

Equality Impact Analysis Record (Inclusion Risk and Benefits)

This form should be completed in conjunction with EIA Tip Sheet and Key EIA Considerations

Part 1 – The Document

| | | | | |
|----|---|---|--|--|
| 1. | Name of Policy, Procedure, Activity, Decision or Service: | ESFRS Integrated Risk Management Plan 2020 – 2025 revised/ amended proposals following consultation. The evidence in this EqIA is evolving. At the time of writing, full details have not emerged from ORS and fuller, more detailed analysis will inform the next review in late August/ early September. | | |
| | Status of PPADS (please tick) | <input type="checkbox"/> NEW | <input checked="" type="checkbox"/> UNDER REVIEW | <input type="checkbox"/> CHANGING <input type="checkbox"/> EXISTING |
| 2. | a) Main purpose of PPADS: | <p>This EIA is made in support of the range of changes proposed for the 2020-2025 IRMP:</p> <ul style="list-style-type: none"> • Operational Resilience Plan • Crewing Pool • On-call Combined Salary Contracts • On-call Flexible Contracts • FRDS/VCDS at 5 DC Stns (9 staff) • FRDS/VCDS at 1 DC Stn (7 staff) • Removal of DC P4's • Re-classify Maxi-cabs to P1 • Replace P4's with Op spares • New P2 to Bohemia Rd • Reclassify The Ridge to a DC Stn FRDS/VCDS (9 staff) • Relocation & revision of Special appliances/ Teams • Group Crewing at 3 24/7 Shift Stns across Brighton & Hove | b) Project Manager and Process owner: | ORR Project Board – then transferred responsibility to the IRMP Strategic Implementation Board |
| | c. Project/processes this PPADS is linked to: | ESFRS Operational Response Review 2019-20 ESFRS Draft Integrated Risk Management Plan 2020-2025 (Modified proposals) | | |
| 3. | List the information, data or evidence used in this analysis: | <ul style="list-style-type: none"> • ESFRS diversity data • ACAS Research paper - Neurodiversity at work 09/2016 • CIPD Neurodiversity at work Guide 02/2018 • ORR End-of-Stage 1 Main Report • ORR Individual Station Risk Profiles • Draft IRMP Consultation data • HM Treasury - Public Service Pension Scheme EqIA July 2020 • NFCC draft EqIA template | | |

| Part 2 - Analysis | | | | |
|---|-------------------------------------|---|-------------------------------------|--|
| Characteristics | Neutral Impact (x) | Negative Impact* (Risk Assess & score) | Positive Impact (x) | Narrative Section, detail below why and how you scored impact, you should consider: <ul style="list-style-type: none"> What are the risks &/or negatives, benefits and or opportunities to that Protected Characteristic? You <u>will</u> need evidence to support your analysis. |
| A person of a particular age | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | 1 x 2 = 2 (LOW) This subjective assessment indicating a positive impact reflects the potentially attractive nature of a flexible working pattern identified within the Flexible Resourcing Pool and/or FRDS/VCDS. Other Workstreams are assessed as neutral at this time as no evidence to the contrary has emerged. |
| A disabled person | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1 x 2 = 2 (LOW) This subjective assessment is based on the nationally recognised statistic of the average number of employed staff with a neurodisability across a workforce and the actual number of declared within ESFRS as a percentage. |
| A person of a particular sex, male or female | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1 x 2 = 2 (LOW) This objective assessment is based on the nationally recognised statistic stating that on average 70% of carers are female, |
| Pregnancy, Maternity, Marriage or Civil Partnership | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | This Workstream is assessed as neutral at this time as no evidence to the contrary has emerged. |
| A person of a gay, lesbian or bisexual sexual orientation | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | This Workstream is assessed as neutral at this time as no evidence to the contrary has emerged. |
| A person of a particular race | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | This Workstream is assessed as neutral at this time as no evidence to the contrary has emerged. |
| A person of a particular religion or belief | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | This Workstream is assessed as neutral at this time as no evidence to the contrary has emerged. |
| Transgender a person whose gender identity/expression does not make their assigned sex | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | This Workstream is assessed as neutral at this time as no evidence to the contrary has emerged. |
| Community considerations Application across communities or associated with socio-economic factors considering the 10 dimensions of Equality | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | 1 x 2 = 2 (LOW) This subjective assessment indicating a positive impact reflects the evidence presented in the ORR modelling for the ORP (modified proposal 1) where greater emergency response cover is provided for longer periods of time, notably where socio-economic factors are prevalent. |
| Criminal convictions | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | This Workstream is assessed as neutral at this time as no evidence to the contrary has emerged. |
| Rural living | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | 1 x 2 = 2 (LOW) This subjective assessment indicating a positive impact reflects the evidence presented in the ORR modelling for the ORP (modified proposal 1) where greater emergency response cover is provided for longer periods of time. Existing standards are not made worse. |
| Human rights | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | This Workstream is assessed as neutral at this time as no evidence to the contrary has emerged. |

Part 3 – The results

| | Yes | No | |
|---|--------------------------|-------------------------------------|---|
| Are some people benefiting more than others? If so explain who and why. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Any staff or customer with neurominority conditions will not be disadvantaged or discriminated against <u>subject to a planned, proactive communications strategy that provides sufficient time and detail in a range of formats to mitigate.</u> Subject to agreement of amended proposals by the CFA, all decisions will be defined and designed in cognizance of robust People Impact Assessments that will stimulate more detailed and specific EqlA's in regard to each workstream. |
| Are one or more negative scores in Medium or High ? (See guidance) | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |

Part 4 - Consultation, decisions and actions

If medium or high range results were identified who was consulted and what recommendations were given?

None at this time - N/A

Describe the overall decision on this Policy, Procedure, Activity, Service or Decision:

- Maintain this EqlA by reviewing available I&D data and assessing the impacts to the 9 x protected characteristics**
- Maintain action point list and use emerging data in the definition and design stages of each IRMP workstream as a structured agenda item**

Part 5 – Sign Off

Created by (Print Name): MATTHEW ELDER

Department: PLANNING & INTELLIGENCE TEAM

Signature**  (electronic/ by email)

Date: 20/08/2020 (5th review)

To be completed by Equalities Team

Signature**

EIA number:

Assessment date:

Review date:

** Please type your signature to allow forms to be sent electronically**

The overall outcome for this EqIA is:

Outcome 2: To adjust the policy, practice, procedure or plan. “The assessment identifies potential problems or missed opportunities whereby practices need to be adjusted in order to remove barriers or better promote equality.”

| Part 6 - Equality Improvement Plan | | | | |
|---|---|--|---|--|
| Issues Area of adverse impact and Reasons | Solution Action What can be done to mitigate impact, what can be done to obtain further information | Responsibility/Lead Manager Who will be responsible for this action | Target Timescales When will this be completed Financial factors | Comments Corporate Risk Factors |
| <p>Disability: Employees who are the primary Carers for their family may be disadvantaged during the short to medium term of a new duty system resulting from being part of an institutionalised workforce having to make alternative care arrangements with some considerable expense.</p> <p>Gender: National statistics show that 70% of primary carers are female. Changes to duty systems may have short to medium term disadvantageous impacts as above</p> | <ol style="list-style-type: none"> Pace of change: Dependent on numbers of staff leaving the DCDS through natural turnover from 12 to 11 to 10 before swapping to FRDS/VCDS. Identify real or perceived barriers and the solutions to either remove or provide adjustments using consultation responses, direct investigation with staff/ Action Learning Sets and Peer review Review Policy docs related to each change and area of adverse impact/ evidence emerging | <p>Senior Responsible Officer for IRMP Implementation with:</p> <ul style="list-style-type: none"> Programme Manager PIA Lead/ Action Learning Set | <ul style="list-style-type: none"> 30.3.20 - then as per specific delivery timeframe for each IRMP workstream. No financial factors identified | <ul style="list-style-type: none"> Litigation based on negligence Reputational following litigation/ investigations into discriminatory practice |
| <p>Disability: Neurodiverse conditions</p> | <ol style="list-style-type: none"> Construct communications article in consideration of ND for publication across a range of media explaining the proposals for change Identify any real or perceived barriers and the solutions to either remove or provide adjustments using consultation responses, direct investigation with staff/ Action Learning Sets and Peer review Review Policy docs related to each change and in consideration of area of adverse impact/ evidence emerging | <p>Senior Responsible Officer for IRMP Implementation with:</p> <ul style="list-style-type: none"> Programme Manager PIA Lead/ Action Learning Set | <ul style="list-style-type: none"> 31.3.20 – then as per each specific delivery timeframe for each of the IRMP workstreams. Dependent upon the adjustments which need to be implemented based upon who declares their ND condition. May include equipment, staff costs etc. | |

Risk Matrix

| | | | | | |
|-------------------|---------------------|----------|----------|--------|-------------|
| Fatalities | 5 | 10 | 15 | 20 | 25 |
| Major | 4 | 8 | 12 | 16 | 20 |
| Serious | 3 | 6 | 9 | 12 | 15 |
| Minor | 2 | 4 | 6 | 8 | 10 |
| Negligible | 1 | 2 | 3 | 4 | 5 |
| ↑ Severity | Very unlikely | Unlikely | Moderate | Likely | Very likely |
| | Likelihood → | | | | |

| | |
|---------------|---|
| Low Risk | Adequate control measures are needed that are proportionate to the level of risk |
| Moderate Risk | More effort is needed to identify appropriate control measures |
| High Risk | Considerable effort is needed to identify sufficient control measures to reduce the risk, and/or the benefit of the activity has to be high (e.g. life-saving measures) |