

Appendix 7

FULL EQUALITY IMPACT ASSESSMENT/EQUALITY ANALYSIS

FORM HRFEIA

Name of Policy, Decision, Strategy, Service, Function, Other (Please indicate)	Emergency Cover review – Equality Analysis of the impact on staff
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Date of Assessment	9 November 2022 – This equality analysis is currently in development.

We carry out Full Equality Impact Assessments (EIA) where we are unsure or know that the policy/decision will have an impact on an equality group or further to completing an Initial analysis negative impacts have been identified. The EIA should be undertaken/started at the beginning of the policy development process, before any decision is made. It will be updated through the decision making/policy development process until the conclusion of the decision making/ policy development process and then it is completed.

1. Overview

The main aims/objectives of this policy¹ are:
<p>The Service commenced a consultation process from 22 July 2022 to the 14 October 2022. The aim of the consultation was to consult with local communities and staff with regard to the proposals contained within the Emergency Cover Review. Several proposals were being considered, which further to feedback have been amended. This Equality Impact Assessment focuses on the impact on staff from an equalities perspective of the revised proposals primarily relating to the introduction of a new shift system – Flexible Wholetime (FWT) (still subject to Trade Union consultation) and the change of shift arrangements at several Fire Stations only.</p> <p>In developing the proposals, the Service identified as of importance: The need for the Service to meet its response standards for the time it takes to reach incidents in every area of Lancashire, ensuring the Service had effective and resilient crewing arrangements to deliver its Services and assurance that the Service had the right equipment and technology, so it was fit for the future. Also of importance was the need to deliver a balanced budget in relation to the delivery of any change.</p> <p>Following a 12-week consultation period the following changes are being considered, this equality analysis considers any impact on employees in relation to the proposed changes.</p> <p>Introduction of a new FWT duty system, the initial proposals in relation to this system have been amended further to feedback and to mitigate the impact on employees. The shift system and working duration will mirror the 224-shift system but will allow for staff to self-roster (this proposal is still subject to Trade Union consultation).</p>

¹ Policy refers to any policy strategy, procedure, function decision or delivery of service

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Morecambe, Fleetwood, and Skelmersdale Fire Stations will change from working the DCP shift system to either the 224 or Flexible Wholetime shift system which will result in an increase in crewing from 14 to 24.

The staffing establishment on the remaining DCP stations at Darwen, Rawtenstall, Nelson and Bispham will reduce from 14 members of staff to 13 members of staff (excluding Chorley and Bamber Bridge), it is anticipated that this will be achieved through voluntary transfers, or the natural turnover of staff.

At Lancaster, Hyndburn and South Shore Fire Stations it is proposed to replace the current 224 shift system with the Flexible Wholetime shift system. If Trade Union agreement is not reached, these Fire Stations will remain working the 224-shift system with a reduced staffing establishment of 24.

St Anne's and Penwortham Fire Stations will change from working the DCP shift system to either the Flexible Day Crewing system, or Day Crewed with an On Call provision at night, this change is subject to further consultation with staff and Trade Unions.

It is proposed to reduce the staffing establishment at Stations who work the Flexible Day Crewing Fire Stations at Bacup, Leyland, Ormskirk and Fulwood from 14 to 13, it is anticipated that this will be achieved via volunteers or through the natural turnover of staff.

Is the policy or decision new or under review or existing²

New/Proposed

Modified/Reviewed/Updated/Adapted

Existing but new EIA

The main intended people or groups that will be most affected by this policy are:

Employees

2. Findings/Evidence

Findings/Evidence: The following information/data has been considered in developing this policy/decision (This may include census data, the results of any consultation with community groups or representative bodies.)

What did you do/consider, list any consultation with employees, service users, unions, members of the public	What did it say
Consultation undertaken by Pearson Insight were commissioned to undertake consultation which	234 responses from members of staff were received. 40% of staff agreed the proposals represented value for money 29% disagreed.

² To tick the box: right click, properties, click check the box

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<p>commenced 22 July 2022 for 12 weeks and closed 14 October 2022</p> <p>Consultation sessions held internally for all LFRS staff; 27 engagement sessions were undertaken with firefighters plus additional sessions with managers</p> <p>The proposals were circulated to employee voice groups comprising women, members of staff who are LGBT+ and BME.</p> <p>Use of social media and “In the know” to target audiences as well as Libraries</p> <p>Three methods of feeding back into the Service were utilised: Online public survey Online staff survey Via consultation email in box</p>	<p>46% of staff agreed with the statement that the ECR reflected the most effective and efficient use of resources for the whole of Lancashire.</p> <p>43% if staff agreed with the proposal to introduce flexible wholetime whilst 34% disagreed.</p> <p>Firefighters were supportive of the principle of self-rostering, but 64% disagreed with the length of the proposed shifts, the main comments from staff related to shift patterns not being family-friendly, concern about honouring pre-booked leave and the impact proposed shift patterns could have on staff wellbeing. Further to that feedback and to mitigate the impact of the proposal, the proposed shift systems has been amended and the working arrangements are now the same as existing the shift systems i.e., 8.00am to 6.00pm and 6.00pm to 8.00am.</p> <p>Of the 37 respondents on DCP, 70% disagreed with the proposals for St Annes and 62% in Penwortham. Three quarters of these staff would prefer to work the day crewing plus system at another location. To mitigate this impact, members of staff who are permanently assigned to DCP will have the option to continue working it at a different location.</p> <p>1 female liked the idea of self-rostering to accommodate childcare under the Flexible Wholetime proposal, whilst other members of staff preferred the fixed working pattern. No members of staff who identified as BME responded to the consultation.</p> <p>Feedback from the 18 to 24 age group who responded: no issues identified from an equality perspective.</p> <p>Feedback from the 25 to 34 age group: Some liked the flexibility of flexible wholetime others preferred fixed shifts, some didn't like the proposed long shifts, this has been mitigated via changing the proposal to a shorter shift, some liked the idea of a 24-hour shift, this required an agreement with the Trade Union, who have not agreed this option and therefore this proposal has been dropped from the proposals. A small number of individuals referred to the loss of the DCP allowance and travelling, this has been mitigated as those members of staff who are permanently assigned to DCP will have the option to continue working it, albeit potentially at a different location. The cost of housing St Annes and Penwortham was raised as an issue, a couple of options have been proposed and further consultation with employees and Trade Unions will take place.</p> <p>Feedback from the 35 to 44 age group was similar to the above, though additional comments were made that it was difficult to assess the Flexible Wholetime shift system without having worked it. A trial will take place of the new Flexible Wholetime shift system to ensure it is fit for purpose for both employees and LFRS.</p>
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<p>Representative feedback</p> <p>bodies</p> <p>The permanent staffing profile of Stations affected by the transition from DCP to Flexible Wholetime or DCP</p>	<p>Feedback from the 45 to 54 age group was similar to the above, though additional comments were made that for members of staff wishing to remain on DCP they may have to travel further. It is anticipated that members of staff who are permanently assigned to DCP will have the option to continue working that shift potentially at a different location, alternatively for those where reduced travel is a priority they may opt to remain at their current station.</p> <p>Feedback from the 55 to 64 age group was similar to the above, no equality issues were raised.</p> <p>FBU: Welcome the total number of increased numbers of frontline firefighters and the reduction of the DCP system, they made several comments in relation to the proposals but did not identify any equality issues arising from the proposals. The FBU would not agree to working back-to-back shifts, this option has been dropped from the proposals. Consultation in relation to the creation of a new Flexible Wholetime shift system is still ongoing.</p> <p>FOA: Overall support the proposals, suggested further DCP stations should be kept open and suggested Penwortham should remain DCP, several comments made in relation to the proposals but did not identify any equality issues.</p> <p>Further to the review of DCP and the Emergency Cover Review deployment to DCP stations has been on a temporary basis. All these members of staff have been made fully aware that they have been temporarily located to a DCP station pending review. The consultation did cover permanent, temporary staff and those affected by the change from 224 to flexible wholetime.</p> <p>The permanent workforce profile of the DCP Stations primarily affected by the proposals (Fleetwood, Skelmersdale and Morecambe) is primarily male and white with the majority of staff being aged 45 – 54 years with a significant proportion aged 35 – 44 years, small numbers aged 25 – 34 and 55 – 64.</p> <p>The permanent workforce profile of the DCP Stations where further consultation is on going (St Annes and Penwortham) in primarily white and male and, the majority are aged between 35 – 44 years, with a smaller number aged 45 – 54 years and a very small number aged 55 – 64 years</p>
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3. Equality Impact

Using the table below please indicate whether the policy/strategy/decision has a positive, negative or no impact from an equalities perspective on any of the protected equality groups listed below.

Equality	Positive Impact It could benefit	Negative Impact It could disadvantage	Reason why there is a positive and negative impact and any mitigating actions already in place to reduce any negative impact	No Impact
Age People of all ages				x
Disability Physical Disability Learning Disability Learning Difficulty Mental Health				x
Gender Identity/ Gender Reassignment				x
Pregnancy and Maternity			Further to risk assessment pregnant female firefighters are allocated modified duties during periods of pregnancy to protect the unborn baby	x
Race Ethnicity Nationality				x
Belief or Religion	x		Currently there are no members of staff who are BME at Fleetwood, Morecambe or Skelmersdale. However, in the event of those Stations become more diverse the Flexible Wholetime Shift system does allow flexibility for staff to vary their working arrangements to accommodate times of fasting in	

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			accordance with religious festivals.	
Gender Men/Women	x	x	<p>The length of the shift was identified as not being family friendly, this has been removed from the proposals.</p> <p>Some members of staff preferred flexible working to fit with family life. Some members of staff preferred fixed working arrangements to fit with family life. If the proposals are agreed we will work with members of staff to try to meet their preferences.</p> <p>Some members of staff identified any increased travel as an issue, this is mitigated through allowing permanent members of staff to remain working at their current station if they so wish. Where members of staff are compulsory transferred travelling expenses are payable.</p> <p>Some members of staff identified the loss of the DCP allowance as an issue, this is mitigated for members of staff who are permanently assigned to DCP, they will have the option to continue working DCP, albeit potentially at a different location.</p>	
Sexual Orientation Lesbian, Gay and bisexual people				x
Marriage and Civil Partnership (employment only)				x
Other groups who are not protected under the Equality Act Examples include social economic factors (i.e. poverty, isolation), unemployment, homelessness, rurality, health				x

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inequalities any other disadvantage.				
Contributes to equality of opportunity				X
Contributes to fostering good relationships between different groups				X
The decision will be taken in compliance with Human Rights ³	Yes	<input checked="" type="checkbox"/>		
	No	<input type="checkbox"/>		

4. Outcome of the Equality Impact Assessment: Actions to be taken

What course of action does the Equality Impact assessment Suggest you take	
<p>Outcome 1 - No major change required The EIA has not identified any potential discrimination or adverse impact and all opportunities to promote equality have been taken.</p>	<input checked="" type="checkbox"/>
<p>Outcome 2 - Adjust the policy To remove the negative impact identified in the EIA or to promote better equality.</p>	<input type="checkbox"/>
<p>Outcome 3 - Continue with the policy despite negative impact – Stop and Think You need to ensure the Equality Impact Assessment clearly sets out the justification for continuing with it. You should consider whether there are sufficient plans to reduce the negative impact and to monitor impact. Complete the EIA Action Plan.</p> <p>If you are continuing with the policy despite the negative impact you need to seek guidance from the Head of Human Resources as this shows the EIA demonstrates a significant impact on people with a protected characteristic</p>	<input type="checkbox"/>

³ Human Rights are the basic rights and freedoms that belong to every person in Europe regardless of nationality and citizenship. Human Rights are based on the five FREDA principles: Fairness, Respect, Equality, Dignity, Autonomy.

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