EQUALITY IMPACT ANALYSIS

Overview Details			
Function /Department	People and Organisational Development	**Date Of analysis**	9th June 2022
Title and overview of what is being assessed / considered	Pay Policy PODPOL10	**16th June 2022**	
Who will be affected by this activity? (Please tick) Station Managers and above		Staff ☒	Public ☐
Author of Equality Impact Analysis	Amanda Cross	**Equality Analysis quality assured by (Member of the POD team)**	

The purpose of undertaking an equality impact analysis and assessment is to understand the potential and/or actual impact that a service or policy may have on protected groups within the Equality Act (2010). The protected groups are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion and / or belief
- Sex (gender)
- Sexual orientation
- Socio-economic disadvantage (Although not one of the 9 protected groups MFRA recognise that Socio-economic disadvantage affects many deprived communities within Merseyside.)

People who are protected from discrimination on the basis of any of these characteristics are described in this document as belonging to one or other "protected group". In addition, equality analysis can be applied to groups of people not afforded protection by the Equality Act, but who often face disadvantage and stigma in life in general and when trying to access services & employment opportunities. Such groups include homeless people, sex workers, people who misuse drugs and other groups who experience socio economic disadvantage & others. This

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template has been developed following consultation with staff and other external stakeholders including reference to the National Fire Chiefs Councils (NFCC) equality impact assessment toolkit as well as the Maturity Models and Workforce Good Practice Frameworks developed by the NFCC which MFRS will use to underpin EIAs as wider work on improvement.

Impact Analysis		
1	**What evidence have you used to think about any potential impact on particular groups?** (Please highlight any evidence that you have considered to help you address what the potential impact may be) **Example evidence:** - ONS Census data - Regional or local demographic information - MFRS reports & data - NFCC Reports/Guidance - Home office/Local government Reports - Risk Assessments - Staff survey results - Research / epidemiology studies - Updates to legislation - Engagement records or analysis **NFCC** Equality of Access documents – We encourage you to click on the following **link** to access a series of 'equality of access documents', developed by the National Fire Service Council (NFCC) & reference the data and information highlighted. Some aspects of these documents will help you provide information, awareness, and data to support: - Integrated Risk Management Plans	All employees of the Fire Service deserve to have their pay determined in an open and transparent manner and this is scrutinised by external audit and the HMRC. Pay policy for the majority of grey and control employees is determined at National Level with circulars and updates from the NJC. However, Senior Manager grey book pay is determined at local level to reflect the needs of the Authority by elected Councillors. Green book employees are paid following a pay review process using a local government sponsored system called Gauge. The Gauge system has been devised to be as free from bias and discrimination as possible with the language refreshed by the system providers on updates. It is the role not the person undertaking the role that is assessed and a set of key statements are analysed by a trained assessor. Each pay review is moderated by a panel of other pay reviewers to ensure consistency and fairness. Similar roles are compared and each assessor looks for " bias" in the scoring and will moderate the answers if applicable. This process is for non-operational roles up to " Head of " level. At these levels market forces, experience, level and breadth or responsibility and role expertise/complexity are factored into the pay review. MFRS also participates in Basecamp- a network of employers from the North West Employers Association where pay, benefits and job roles is shared. It should be noted that the standard MFRS working week is 35 hours per week rather than 37.5 or 39 so some mathematics is required to get a direct comparison and the benefits of working for MFRS alter the overall remuneration package.	

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	• Service delivery strategies • Positive action and recruitment plans • Workforce improvement plans • Community engagement activities • and, will prompt conversations within the workplace. Each document provides a significant amount of data and information, including research undertaken and risk-based evidence, and then goes into some ideas for actions which Services can use based on the information and their individual circumstances	Basecamp also communicates briefings regarding national pay bargaining, for example, the impact of an uplift in the Living Wage to spinal points. As an organisation we are committed to being transparent about our progress towards building a more inclusive, diverse and equitable organisation. Therefore, pay gap reporting is a key part of this. Annually we publish both gender and ethnicity pay gaps. This policy document references the strategy relating to the pay mechanisms currently in place.
2	**Do you have all the evidence you need in order to make an informed decisions about the potential impact?** (Please tick)	**Yes ☒** If you feel that you have enough evidence, then you will **not** need to undertake any engagement activity	**No ☐** If you feel that you do not have enough evidence to make an informed decision then you **will need to** undertake engagement activity with the staff or members of the public as applicable

3	**What engagement is taking place or has already been undertaken to understand any potential impact on staff or members of the public?**
	
	Examples include:
	Public
	  • Interviews
	  • Focus groups
	  • Public Forums
	  • Complaints, comments, compliments
	Staff
	  • Staff events / workshop
	  • Existing staff meetings / committees
	  • Staff Networks
	  • Representative Bodies
	  • Annual Staff Survey questions
		The pay policy has been in existence for a number of years and the EIA is a refresh of the old documentation.
		
		MFRS undertake annually a gender and ethnicity pay gap analysis.	

4	**Will there be an impact against the protected groups as described in the Equality Act (2010)?**		**Not applicable** ☒
	Summarise what impact there may be against each of the protected groups. Embed or provide a hyperlink to any reports or electronic files to which you are referring. Please remember when considering any possible impacts, these may be positive or negative and that there may be different impacts for our own staff when compared to those possible impacts on members of the community. Please detail clearly if the impacts are for staff or the wider community. It is also important to note that there may not be an impact on some of the protected groups if this should be the case please tick the not applicable	What is the **actual** or **potential** impact on **disability?** The Service will make reasonable adjustments to enable a disabled person to remain in work and to undertake the hours they are assessed by a Service Dr of undertaking. We have not yet had an issue where an employee has required work to be removed from them as a part of a reasonable adjustment and thought would need to be given to whether this impacts the job evaluation grade (particularly in to supervision of employees which attracts a higher rating)	**Not applicable** ☒
		What is the **actual** or **potential** impact on **gender reassignment?**	**Not applicable** ☒
		What is the **actual** or **potential** impact on **marriage and civil partnership?** .	**Not applicable**

			☒
If there is **no impact,** please state that there is no impact.	What is the **actual** or **potential** impact on **pregnancy and maternity?** The Service has generous maternity provision and Basecamp/ FRS peer review has placed it as one of the most generous in English, Scottish and Welsh government. Maternity pay is part of the overall remuneration package.		**Not applicable** ☐
	What is the **actual** or **potential** impact on **race?** The proportion of BAME employees in operational roles (5.3%) is very close to the local population (5.5%). We believe this to be the most accurate comparision in relation to MFRS being representative of our own communities and it shows the success of our positive action work in Merseyside. When compared to both the English average (5.1%) and Metropolitan fire and rescue services (10.5%), MFRS had proportionally fewer Black and Minority Ethnic (BAME) members of staff regardless of role (4.6%), but this comparison can be misleading due to significant differences in the proportions of BAME people throughout the country.		**Not applicable** ☒
	What is the **actual** or **potential** impact on **religion and / or belief?**		**Not applicable** ☒
	What is the **actual** or **potential** impact on **sex (gender)?** The latest ED&I report shows when looking at our gender pay gap reporting for 2021/22 that across the organisation, the mean gender pay gap is 10.3% or £1.70 per hour. For operational staff only, the gap is 9.5% and for support staff the gap is wider at 13.2%.		**Not applicable** ☐

		When the 2021/22 gender pay gap is compared to the previous year, it identifies that overall the gender pay gap has slightly increased from 9.9% to 10.3%. For Support Staff the gap increased from 11.2% during 2020/21 to 13.2% during 2021/22. For operational staff, the gender pay gap also increased from 11.2% during 2020/21 to 13.2% during 2021/22.

The gender pay gap reveals several key issues pertinent to the pay policy. Overall, the gender segregation has identified key issues in terms of horizontal and vertical segregation.   The uniformed gender segregation is hugely influenced by the imbalance of male and women in the Service. Women are heavily under-represented in uniformed roles at all levels. Actions to address this are in place as part of MFRS commitment towards positive action. Existing initiatives appear to be focused on entry level and an emphasis should now be placed on succession planning and career progression.

The shift patterns in Control do not seem to have had a negative impact in both attracting or retaining female personnel. In terms of Support employees there is a reasonable balance of men and women throughout each level. However, women predominate in the lower grades | |
| | | What is the **actual** or **potential** impact on **sexual orientation?** | **Not applicable** ☒ |
| | | What is the **actual** or **potential** impact on **Socio-economic disadvantage?**
In order to ensure pay parity in increments an employee will always be placed onto the bottom of the next band unless this results in a pay increase of less than £500. This ensures that our lowest graded employees receive a meaningful pay rise. | **Not applicable** ☐ |

MFRS has identified the following planned actions to remove the gender/ethnicity pay gap and reduce occupational segregation:

- Work regional comparators on a regional and national level & adopt best practice
- Continue to use job evaluation as a means of ensuring job are graded correctly
- Use positive action across all roles and levels to address under representation in terms of gender and ethnicity.
- Carry out a qualitative analysis to ascertain the full extent of working practices and specifically the impact of shifts, flexible working patterns and physical fitness requirements for both Uniformed and Support employees.
- Remain mindful of the impact of bias and the recruitment and selection process.
- Continue to explore creative use of hybrid working & family friendly practices
- Conduct future pay reviews and analysis of retention data to determine whether any inconsistencies exist in the reasons noted for leaving the MFRS by job category/grouping

ACTION PLAN

What actions need to be taken in order to mitigate the impacts identified in sections 3,4 and 5?				
Impact	Action Required	Integrated existing work (yes/no) outline	Target Date	Responsibility
Age	Contracts run reports to ensure apprentice key birthdates are registered and altered •	Yes		POD
Disability -	Reasonable adjustments are managed by the reasonable adjustments panel, OH and the line manager, Consider undertaking a disability pay gap reporting	Yes		POD
Pregnancy and Maternity -	Maternity pay is managed by the contracts team	Yes		POD
Race/Gender	MFRS has identified the following planned actions to remove the gender/ethnicity pay gap and reduce occupational segregation: • Work regional comparators on a regional and national level & adopt best practice • Continue to use job evaluation as a means of ensuring job are graded correctly • Use positive action across all roles and levels to address under representation in terms of gender and ethnicity. • Carry out a qualitative analysis to ascertain the full extent of working practices and specifically the impact of shifts, flexible working patterns and physical fitness requirements for both Uniformed and Support employees.			

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	Remain mindful of the impact of bias and the recruitment and selection process. Continue to explore creative use of hybrid working & family friendly practices Conduct future pay reviews and analysis of retention data to determine whether any inconsistencies exist in the reasons noted for leaving the MFRS by job category/grouping			
Carers	Requests for time off or reduced hours is managed by the Flexible working panel	Yes		POD
Other				
Deprived communities/socio economic	Consider undertaking socio-economic background pay gaps and to set a socio-economic background target.			

How will these actions be monitored and where will the outcomes be reported?
(Please describe below)

Every pay change has to be able to be scrutinised by external audit. As a result a full trail of paperwork and authorisations is required to demonstrate why someone is not being paid the expected norm (a reduction in hours) or a pay increase- a Pay review .

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Completed by (Please print name /Designation)	Amanda Cross HR Adviser	Signature Date	9th June 2022
Quality Assured by (Please print name /Designation)	Mo Jogi	Signature Date	9th June 2022

Name of responsible SLT member (Please print name /Designation)		Signature Date	

Bibliography and Guidance documents

This bibliography provides details of all the documents and reports included within this EIA or the EIA guidance. The bibliography will also include Hyperlinks to other useful documents, reports, data, and webinars on our portal page or links direct to the websites which you may find helpful when completing your EIA. **Please note, that this is a live document, do not use an old copy of this form to complete a new EIA. Please ensure that you download a new copy from the portal, as the bibliography and links will be updated regularly to ensure you have access to the most recent data, articles and training.**

Documents referenced and hyperlinked within the form

National Fire Chiefs Councils (NFCC) equality impact assessment template
National Fire Chiefs Councils (NFCC) Equality Impact Assessment Toolkit
National Fire Chiefs Councils (NFCC) Maturity Models and Workforce Good Practice Frameworks
   This document provides insight into the NFCC Maturity model and provides guidance on the following areas:
- Leadership Development
- Recruitment
- Learning Organisation
- Blended Learning
- Performance Management
- Employee Recognition
- Talent Management
- EDI
- Well Being
- HR Analytics

Equality Diversity & Inclusion Resource Library
The ED&I resources Library is located on the ED&I portal page and provides a suite of documents (detailed below) from a wide variety of sources, they may be internally produced reports or guidance, toolkits or data produced by the NFCC or partners. A list of the documents can be found below or you can access the complete library here.

Disability related support including:
- AFSA - Lets talk workplace disability

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Gender Related Resources including:
- [Fast Facts for patients – Menopause](#)

Pregnancy and Maternity Related Resources

Religion and Belief related resources including:
- [AFSA – 2021 Workforce Religion and belief Toolkit](#)

Sexual Orientation Related Resources

[AFSA Workforce Positive Action Toolkit](#)

[Dementia Friendly Emergency Services Guidance](#)

[NFCC Equality of Access to Services and Employment](#) which includes:
- NFCC Equality of Access to Services and Actions for the Vulnerable Rehoused Homeless
- NFCC Equality of Access to Services and Employment for Black Communities
- NFCC Equality of Access to Services and Employment for Neurodiversity
- NFCC Equality of Access to Services and Employment for LGBT Communities
- NFCC Equality of Access to Services and Employment for People from Asian Communities
- NFCC Equality of Access to Services and Employment for the Roma Communities
- NFCC Equality of Access to Services and Employment for People Living with Dementia
- NFCC Equality of Access to Services and Employment for People Living in Rural Communities
- NFCC Equality of Access to Services and Employment for Emerging Migrant Communities

These can also be found on the [NFCC website](#)

NFCC Toolkits
The NFCC have also created a number of toolkits to provide help and guidance these can be found here on the [NFCC website](#) or via the links below in the ED&I Resource Library

The toolkits currently available include:
- [Collecting and Disseminating of Equality, Diversity and Inclusion Data Toolkit](#)
- [Gender Diversity Toolkit](#)

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- Neurodiversity Toolkit
- Undertaking an Equality Impact Assessment Toolkit
- Staff Networks Toolkit

Webinars

NFCC Lunch and Learns which include
- Neurodiversity
- Trans Visibility in FRS
- Racial Equality
- Bite Size techniques to avoid burnout
- Being part of the LGBT Community

Other useful Links and documents

ED&I Annual Report this report included our Staffing data, Gender and BAME Pay Gap analysis and recent reporting against our 5 Equality Objectives

Diversity Events Calendar the diversity calendar is helpful to understand what key dates are taking place throughout the year to assist with community engagement

Knowing our Communities Data this is a suite of documents, which provides data within each of the local Authorities, by different protected groups which include Age, Disability, Religion and Ethnicity.

Service Instruction 0877 Resources to support managers and staff to implement the Equality & Diversity Policy
- Appendix 1 - Disability in the workplace information for staff and managers
- Appendix 2 - Reasonable Adjustments Support for staff & managers in the workplace
- Appendix 3 - Access to Work Support for staff and managers in the workplace
- Appendix 4 - Supporting people with Dyslexia in the workplace
- Appendix 5 - Supporting Staff during the Menopause
- Appendix 6 - Guidance for supporting employees returning from maternity; breastfeeding in the workplace Operational Firefighters
- Appendix 7 - Supporting Lesbian, Gay, Bisexual and Transgender (LGBT) staff in the Workplace
- Appendix 8 - Supporting Transgender staff in the Workplace
- Appendix 9 - Neurodiversity in the workplace

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