

EQUALITY IMPACT ASSESSMENT

Overview Details			
Function /Department	People and Organisational Development	Date Of analysis	7 October 2026
Title and overview of what is being assessed / considered	Pay Policy PODPOL10	Review Date	31 March 2027
Who will be affected by this activity? (Please tick)		Staff ☒	Public ☐
Author of Equality Impact Analysis	Mike Pilkington, Head of Human Resources	Equality Analysis quality assured by (Member of the POD team)	Vicky Campbell

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
- 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 and employment opportunities. Such groups include homeless people, sex

workers, people who misuse drugs and other groups who experience socio economic disadvantage and others. This 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. Further guidance can be found at [Equality and Human Rights Commission](#).

MFRS have also created the [ED&I Assurance Checklist](#), which is a useful outline of ED&I factors that staff need to consider to help demonstrate minimum legal compliance, making the most of ED&I opportunities and minimising risk for the organisation. This checklist can be used when preparing plans, discussing new services and organisational change.

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) Also include an introduction here giving background the purpose of the Policy, SI etc. that is being assessed. (A good place to start is the introduction and purpose of the document) Example evidence: • ONS Census data • Regional or local demographic information • MFRS reports & data • NFCC Reports/Guidance • Ministry of Housing, Communities and Local Government (MHCLG) Reports • Risk Assessments • Staff survey results • Research / epidemiology studies	PODPOL10 sets out the Authority's approach to pay across its workforce, including senior officer remuneration, the definition of the lowest paid, pay relationships, job evaluation, incremental progression, pensions and other benefits. The Policy is reviewed annually, approved by the Authority and published to support openness and accountability. The assessment has considered the following evidence: • PODPOL10 Pay Policy 2026 and Service Instruction 0859 Pay Review Process. • Section 38-43 of the Localism Act 2011 and associated pay accountability guidance. • National Joint Council pay arrangements applying to Grey Book, Green Book and Red Book employees. • The Authority's Equality Analysis - Workforce and Employment Data and annual gender and ethnicity pay gap reporting. • Recruitment, retention and labour-market evidence used when considering market supplements. • Local Government Services Job Evaluation Scheme Technical Note 15 on market supplements. • National Minimum Wage and National Living Wage requirements. • Existing payroll, job evaluation, recruitment, promotion and retention information.

	• 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) and reference the data and information highlighted. Some aspects of these documents will help you provide information, awareness, and data to support: • Community Risk Management Plans • 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	Most pay is determined through nationally negotiated terms and conditions or objective job evaluation. Green Book roles are evaluated through the Authority's recognised job evaluation arrangements, while senior Green Book roles are externally evaluated. The process assesses the requirements of the role rather than the personal characteristics of the postholder and includes moderation and governance controls. Where objective evidence demonstrates significant recruitment or retention difficulty that cannot be addressed through normal job evaluation arrangements, a market supplement may be considered. Market supplements are currently used for Driving School Instructor and Workshop HGV Technician posts. They are post-related rather than person-related and should be supported by evidence, separately identifiable from basic pay, applied consistently and reviewed periodically. The equality implications of supplements, including the potential effect on occupational groups and equal pay, require continuing monitoring. A specific EIA has been undertaken for Market Forces supplements. The Authority also publishes gender and ethnicity pay gap information. These reports provide a mechanism for identifying structural or occupational inequalities which may not arise from unequal pay for the same or equivalent work.
2	What engagement is taking place or has already been undertaken to understand any potential impact on staff or members of the public? Examples include:	The Pay Policy reflects established national and local pay arrangements rather than introducing a new pay system. Relevant national pay changes are negotiated through the applicable National Joint Councils and representative bodies. Local pay review and market supplement decisions are considered through established governance arrangements and supported by workforce and labour-market evidence.

	<u>Public</u> • Interviews • Focus groups • Public Forums • Complaints, comments, compliments <u>Staff</u> • Staff events / workshop • Existing staff meetings / committees • Staff Networks • Representative Bodies • Annual Staff Survey questions There may also be legislation or public reports which have had an impact on the introduction for a new process or equipment. Please ensure relevant documents links are included	The 2026 update has also been informed by the Authority's annual workforce equality analysis, pay gap reporting and experience of applying the Pay Policy. No separate public engagement has been undertaken because the Policy concerns employment arrangements for Authority staff. Any significant future change to pay structures or the approach to market supplements should be subject to appropriate consultation and a further equality assessment.	
3	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 further engagement activity	No ☐ If you feel that you do not have enough evidence to make an informed decision, then you may need to undertake further engagement activity with the staff or members of the public as applicable

4	Will there be an impact against the protected groups as described in the Equality Act (2010)? 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 box. If there is no impact, please state that there is no impact and the reasons for thinking this.	What is the actual or potential impact on age? The Policy applies to employees of all ages. National and local pay arrangements are based on role, grade, competence or nationally agreed conditions rather than age. Apprentices are paid the National Living Wage applicable to their age rather than the lower statutory apprentice rate, which is a positive measure for younger workers. Employee pension contribution arrangements are governed by scheme regulations and are applied by reference to pensionable pay. No adverse impact has been identified, but outcomes for apprentices and employees at different career stages should continue to be monitored.	Not applicable ☐
		What is the actual or potential impact on disability? No adverse impact has been identified. Pay is attached to the evaluated role and contracted working arrangements, not disability. Reasonable adjustments, disability-related leave or changes to working arrangements must be considered separately and should not result in unjustified pay disadvantage. Where duties or hours change substantially, any pay or job evaluation implications should be assessed objectively, with HR and Occupational Health advice as appropriate.	Not applicable ☐
		What is the actual or potential impact on gender reassignment? No adverse impact has been identified. The Policy and associated pay arrangements apply irrespective of gender reassignment. Pay decisions should continue to be based on the role and relevant contractual arrangements, with confidentiality and dignity maintained when employee records are updated.	Not applicable ☐
		What is the actual or potential impact on marriage and civil partnership?	Not applicable ☐

		No adverse impact has been identified. Marriage or civil partnership status is not a factor in determining grade, salary, progression, market supplements or access to contractual benefits.	
		What is the actual or potential impact on pregnancy and maternity? The wider reward package includes maternity, adoption, paternity and shared parental provisions. No adverse impact has been identified within the Pay Policy. Reductions in pay associated with statutory or child-related leave must be administered in accordance with the relevant contractual and statutory arrangements. Pay progression, pension banding and market supplement provisions should be applied consistently so that pregnancy or maternity absence does not create unlawful disadvantage.	Not applicable ☐
		What is the actual or potential impact on race? No adverse impact has been identified from the Policy itself. Pay is determined through national agreements, objective job evaluation and approved local arrangements. The Authority publishes ethnicity pay gap information and will continue to monitor representation, recruitment, promotion and retention by ethnicity to identify any inequalities. Market supplements are applied to posts rather than individuals and monitored to ensure that they do not create unjustified disparities between occupational groups.	Not applicable ☐
		What is the actual or potential impact on religion and / or belief? No adverse impact has been identified. Religion or belief is not a factor in determining pay, grading, progression or market supplements. Flexible or other working arrangements linked to religion or belief should be considered under the relevant policies without unjustified pay disadvantage.	Not applicable ☐

		What is the actual or potential impact on sex (male, female) The Policy provides equal rates for the same roles and uses national agreements and job evaluation to support consistency. The principal potential impact is the Authority's continuing gender pay gap, which may reflect occupational and vertical segregation rather than unequal pay for the same or equivalent work. Driving School Instructor and Workshop HGV Technician roles receiving market supplements may sit within occupational areas that are not gender-balanced. Supplements are determined based on evidence, and are proportionate, post-related and subject to monitoring and review. Gender pay gap, recruitment, and retention information is reviewed alongside market supplement decisions.	Not applicable ☐
		What is the actual or potential impact on sexual orientation? No adverse impact has been identified. Sexual orientation is not a factor in determining grade, salary, progression, market supplements or contractual benefits. The Policy is applied consistently to employees in same-sex and opposite-sex relationships.	Not applicable ☐
		What is the actual or potential impact on Socio-economic disadvantage? The Policy has a potentially positive impact by maintaining pay above statutory minimum rates for established roles and by paying apprentices the National Living Wage applicable to their age. Transparent pay structures and nationally negotiated awards provide safeguards for lower-paid employees. However, cost-of-living pressures may have a greater effect on lower-paid staff. The Service will continue to monitor the relationship between its lowest rates and statutory wage levels and consider workforce evidence when reviewing pay and benefits.	Not applicable ☐

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 / apprentices	Monitor apprentice pay against statutory rates and confirm rates are updated when national thresholds change.	Yes - payroll and annual Pay Policy review.	Annual review	POD / Payroll
Disability	Monitor for any evidence that disability-related adjustments, changes to hours or absence create unjustified pay disadvantage.	Yes - reasonable adjustments and pay review processes.	Ongoing	POD
Pregnancy and maternity	Check that pay, progression and pension banding arrangements are applied consistently during and following child-related leave.	Yes - payroll and family-friendly policy administration.	Ongoing	POD / Payroll
Race	Continue ethnicity pay gap analysis and review recruitment, progression and retention outcomes by ethnicity.	Yes - annual workforce equality reporting.	Annual	POD / ED&I
Gender reassignment	No specific action identified beyond consistent application, confidentiality and monitoring of any issues raised.	Yes - existing HR and dignity at work arrangements.	Ongoing	POD
Marriage and civil partnership	No specific mitigating action required. Continue consistent application of pay and benefits.	Yes - existing payroll and HR controls.	Ongoing	POD / Payroll
Religion and/or belief	No specific mitigating action required. Monitor any pay implications arising from agreed working arrangements.	Yes - existing HR processes.	Ongoing	POD
Sex	Continue annual gender pay gap analysis and monitor occupational segregation, recruitment, progression and retention. Include market supplements within equal pay and equality monitoring.	Yes - annual workforce equality reporting and pay governance.	Annual	POD / ED&I
Sexual orientation	No specific mitigating action required. Continue consistent application of pay and benefits.	Yes - existing HR and payroll controls.	Ongoing	POD / Payroll

Market supplements / equal pay	Maintain a documented approval and review process. Record the business case, comparator evidence, amount, duration, affected posts. Review supplements for Driving School Instructors and Workshop HGV Technicians and any future supplements.	Partly - integrate into pay review and market supplement governance.	At each approval and review	Director of POD / Head of HR
Socio-economic disadvantage	Continue to review the lowest pay rates against statutory wage requirements and consider impacts on lower-paid employees through annual pay and benefits reviews.	Yes - annual Pay Policy and budget review.	Annual	POD / Finance

How will these actions be monitored and where will the outcomes be reported?

Actions will be monitored through the annual review of the Pay Policy, annual workforce equality analysis, gender and ethnicity pay gap reporting, payroll assurance, job evaluation governance and periodic review of market supplements. Market supplement monitoring should include, where data permits, applications, approvals, affected posts, amounts, review outcomes and employee profile by protected characteristic. Significant concerns or emerging adverse impacts should be escalated through the Authority's established People and governance arrangements and the EIA updated where the Policy or its application changes materially.

Completed by (Please print name /Designation)	Mike Pilkington, Head of Human Resources	Signature Date	7 October 2026
Quality Assured by (Please print name /Designation)	Vicky Campbell	Signature Date	12 th October 2026

Name of responsible SLT member (Please print name /Designation)	Nick Mernock	Signature Date	12 th October 2026
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Bibliography and Guidance documents

Additional documents used for this assessment: PODPOL10 Pay Policy 2026; Service Instruction 0859 Pay Review Process; Local Government Services Job Evaluation Scheme Technical Note 15: Market Supplements; annual Equality Analysis - Workforce and Employment Data; annual gender and ethnicity pay gap reporting; Localism Act 2011 and associated pay accountability guidance; applicable NJC pay circulars; National Minimum Wage and National Living Wage requirements.

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
- Wellbeing
- 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](#)

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](#)

Home office

[Equality Impact Assessment – Smart Questions](#) - This document has been produced by the Home Office to support HMICFRS and is a Summary of foreseeable impacts of policy proposal, guidance or operational activity on people who share protected characteristics

[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
- NFCC Community Risk – CRMP Equality Impact Assessment

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](#)
- [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

NFCC Listen and learn recordings can also be found on the [Listen and Learn YouTube](#)

Other useful Links and documents

Merseyside Fire & Rescue Services - [Leadership, Values and Behaviours](#)



[NFCC Core Code of Ethics](#)

[ED&I Annual Report](#) this report includes a summary of our Staffing data, and recent reporting against our 5 Equality Objectives 2024 - 2027

[Equality Analysis - Workforce and Employment Data 1st April 2024 to 31st March 2025](#). The purpose of this report is to provide equality analysis of workforce data held by Merseyside Fire & Rescue Authority (MFRA) to meet the requirements of the Equality Act 2010. This report also includes details of our Gender and Ethnicity Pay Gap Reporting

[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.

[Reaching all Communities of Merseyside](#) Guidance for staff about Inclusive Community Engagement

[2021/22 Fire Statistics](#) this includes workforce data published by the government

[Fire Statistics Data Table](#) – October 2024

[Equality and Human Rights Commission](#): How to consider equality in policy making: A 10-step guide for public bodies in England

The Equality Act 2010

[Employer Guides – Equality Act 2010, ENEI](#)

Quick Guide - [The Equality Act 2010 \(Amendment\) Regulations 2023](#), ENEI

[New regulations to preserve EU-derived equality principles](#). GQ Employment Lawyers (2024)