

# **Equality Impact Assessment**

**Merseyside Fire and Rescue Authority**

**Integrated Risk Management Plan 2013/16  
Supplement 2015/17**

# 1. Integrated Risk management Plan ( IRMP) Supplement 2015/17 Equality Impact Assessment report

<b>Title of policy/report/project:</b>	<b>Integrated Risk Management Plan ( IRMP) 2013/15 Supplement 2015/17</b>
<b>Department:</b>	<b>Strategy and Performance</b>
<b>Date:</b>	<b>22.9.14</b>
<b>1: What is the aim or purpose of the IRMP and proposed changes it contains</b>	
<p>The IRMP is MFRA’s primary planning document. It is a statutory requirement of the Fire and Rescue Services Act 2004 and is compiled in line with the National Framework 2012. The plan presents MFRA’s short and medium term aims in relation to managing and reducing risk in Merseyside and the contribution made by MFRA to regional and national resilience. The Supplementary plan to IRMP 2013/16 is based on the risks and the needs of our local communities and sets specific actions for the years 2015/16 and 2016/17.</p> <p>The IRMP has been developed in conjunction with the outcome of the Public Spending Review, which ultimately affects MFRA with a cut of £10 million to its 2013/14 - 14/15 budget, £6.3m from 2015/16 and an anticipated cut of £9.1m for 2016/17 and our IRMP Budget Principles.</p> <p>The IRMP has been developed to address the key risks and challenges facing local communities and sets out the approach we aim to take in order to deliver the most effective fire and rescue service to the local communities of Merseyside whilst considering the public’s views, where possible to; minimise station closures, maintain the same levels of service and avoiding compulsory staff redundancies. These were the key outcomes of the public consultation events held in 2012, 2013 and 2014, where members of the community across Merseyside’s 5 districts were invited to provide their opinions in relation to forthcoming budget cuts and our broad proposals in relation to these cuts in funding.</p> <p>The IRMP has established the following proposals to help the MFRA to respond to the cut in it’s budget :</p> <p><b>1. Fire Station Proposal</b></p> <p>It is now necessary to close or merge fire stations to meet the budget challenges. This process commenced in 2014/15 and will need to continue up to 2020. Full public</p>	

consultations will take place on each proposed change. MFRA will endeavour to maintain 28 appliances but some will be crewed on a wholetime retained basis.

## 2. Capability Policy

The Authority is implementing a Capability procedure that will replace the Absence and Attendance procedure. This will provide a revised approach to sickness management. The procedures will allow local management of sickness absence that will be supplemented by a range of occupational health initiatives, management advice and guidance and early interventions to support all employees in their attendance at work. This Policy has been consulted on widely with key stakeholders and has undergone an EIA.

## 3. Duty Systems

Due to further financial pressures new, more efficient shift patterns and duty systems will continue to be considered. Whilst firefighter safety and productivity was increased by the changes made to the existing working patterns (2 days, 2 nights), a more efficient and effective shift system model may be able to increase safety and productivity further. An individual EIA was completed.

## 4. Home Safety Strategy

The Home Safety Strategy is being refreshed to enhance capacity and engage with more people who are vulnerable in their homes with a particular focus on those residents who are over 65. Officers continue to develop data sharing protocols with partner agencies and referral pathways so operational staff, specialist advocates and volunteers carry out targeted interventions to reduce risk in the home. A full individual EIA was undertaken for the Home Safety Strategy.

## 2: Who will be affected by the changes proposed in the IRMP

All communities on Merseyside  
Visitors to Merseyside  
MFRA Employees  
Authority Members  
Local Authorities and other Emergency Services  
Other Community Partners

## 3. What monitoring data have you considered

*Summarise the findings of any monitoring data you have considered regarding this policy/report/project. This could include data which shows whether it is having the desired outcomes and also its impact on members of different equality groups.*

**What monitoring data have you considered?**

**What did it show?**

The report shows that there are almost 1.4 million residents in

<p>Equality data and Demographics report for Merseyside - <a href="http://www.merseyfire.gov.uk/asp/asp/pages/equality/pdf/Profile_of_Merseyside_Demography_Equality_and_Diversity.pdf">http://www.merseyfire.gov.uk/asp/asp/pages/equality/pdf/Profile_of_Merseyside_Demography_Equality_and_Diversity.pdf</a></p>	<p>Merseyside , an increase of 1% since 2001 ( 13,400 people)  The population is split into 48.6% males and 51.4% females.  Merseyside has a lower proportion of children (16.5%) and higher proportions of working age residents (66.3%) and older people (17.2%) than the North West averages. The trend shows an aging population with older groups increasing and younger age groups decreasing.</p> <p>Merseyside is not as religiously diverse as the rest of Northwest with the biggest proportion of residents being Christian at 74%.</p>
<p>MFRA Customer Insight Data and MFRA Risk Maps: 1 to 5</p>	<p>Merseyside Fire &amp; Rescue Service has developed a risk model, which focuses on the risk to life and is based on the factors which we know have most impact upon risk. This approach uses relevant data sets, including the Indices of Multiple Deprivation as well as local, historical incident response data. Weightings have then been used to represent the differing influence of these data sets on risk. All of these factors are then totalled, banded and then mapped by area to establish the MF&amp;RS risk map. These themed maps help us to understand the likelihood of a particular event occurring in a given area, which in turn forms a part of the risk assessment process. It ensures we target our resources at locations with identified risks.</p> <p>There are some large areas of Merseyside that fall within the highest levels of social deprivation. There remain large pockets of deprivation with high levels of social exclusion and crime; 40% of wards in Merseyside are ranked in the top 5 percentage of the most deprived wards in England.</p>
<p>MFRA Performance Indicators 2013/14</p>	<p>Merseyside is safer and stronger as a result of the actions that the Service has taken since 1999 to prevent fires and other incidents. In particular our performance indicators show that :</p> <ul style="list-style-type: none"> <li>▪ Overall incidents have fallen from 23,023 to 15,348 in the last 5 years</li> <li>▪ On an average day we attend 33% fewer incidents – showing our prevention work is effective at preventing fires and other rescues</li> <li>▪ Accidental dwelling fires have reduced by 11% and Knowsley in particular has seen the largest reduction at -11% or 37 incidents.</li> </ul>

#### 4: Research

*Summarise the findings of any research you have considered regarding this policy/report/project. This could include quantitative data and qualitative information; anything you have obtained from other sources e.g. CFOA/CLG guidance, other FRSs, etc.*

##### What research have you considered?

Fire and Rescue Service Act 2004 and National Fire and Rescue Framework 2012

Appropriate legislation as it applies to the Fire and Rescue Service e.g. Equality Act 2010

Integrated Risk Management Plan Consultation 2012 onwards reports

Previous MFRA EIAs carried out Key Policies

##### What did it show?

Establishes the powers and duties of the FRS and sets out the requirement to undertake an IRMP and what needs to be covered.

Sets out the legal framework which the MFRA needs to comply with in relation to assessing the impact of any changes to services on different equality groups

Describes the public consultation process, approach and outcomes for the 5 district forums. (See section 5 Consultation and specific merger and closure consultations for more detail) this intelligence has been our guiding principles for making proposals for change to services to meet the budget cuts imposed by the government.

Help to identify any Equality Issues to consider when making any changes to service provisions to the public and the impacts on different groups of staff.

#### 5. Consultation – Background on the IRMP 15-17 consultation process

The current National Framework for the Fire and Rescue Service sets out the expectations on Fire and Rescue Services to engage with communities regarding the decisions it makes about service provision when stating:

*“Fire and rescue authorities are accountable to their communities for their actions and decision making. They need to have transparent processes in place to deliver this and engage*

*with their communities to provide them with the opportunity to influence their local service. Local accountability is a vital check on the services provided by fire and rescue authorities.”*

MFRA is also aware when developing consultation plans of the Localism Act, which provides a greater opportunity for the public to scrutinise and challenge the decisions made by local authorities. For this reason that MFRA began consultation with the public early in June 2012 to enable the public to shape the proposals for change as a result of the funding cuts from government.

In addition, The Public Sector Equality Duty sets out arrangements for public bodies (including FRA) to consider the needs of different Protected Groups<sup>1</sup> in the way it designs its services and policies. It is therefore of great importance to ensure that consultation on the IRMP involved people from all diverse groups. The decisions made by MFRA have been able to reflect the needs of communities and be supported by them and this resulting in greater transparency and accountability, and members of the community will have a stake in the development of levels of service that affect them.

### **What Consultation has taken place and what did it say?**

The reports on the outcomes of the January 2014 IRMP, Merger and closure consultation forums are attached at **Appendix C**. The forums were very successful and resulted in some high quality comments and views that members and officers found useful in making decision about the needs and the priorities of different community groups.

In summary there were 5 public IRMP consultation forums held across the 5 districts. Each forum had a good representation of all protected groups. Likewise for the Merger Consultations a public focus group, public meeting, joint public forum, stakeholder business breakfast, staff communications and presentations to councils and politicians were held in areas with an interest.

The major areas considered by the forums to be considered when making decisions about priorities and resources as a result of any budget cuts were:

#### **1. “Reducing the number of fire stations (and thus fire-fighters and fire engines)”**

The forums were asked to select the criteria they believed to be most important. Participants considered Emergencies and Special Risks to be the most important criteria, followed by Deprivation, Volume of Incidents, and Demographics and, lastly, Distance from Other Stations. Also, when looking at the maps of fire stations and relative risk across Merseyside, participants noticed the varying numbers of fire stations in each area.

#### **2. “Maintaining 26 Fire Stations”**

Participants were asked whether MFRA should maintain its current 26 (mainly 1 pump) fire stations or opt for 16 (mainly 2 pump) stations. Financial efficiency due to less site costs, sale of sites and crewing economies were explained. Overall there was overwhelming support for maintaining 26 fire stations.

---

<sup>11</sup> The Equality Act 2010 covers Protected Characteristics of : age, disability, gender, gender reassignment, pregnancy and maternity, race, religion and belief, sexual orientation and marriage & civil partnerships.

### **3. “Response Time Standards”**

Pre 2004 National Response Standards were discussed at length, isochrome maps were used to illustrate response standards from each station, participants were reminded that the previous 5 forums had very much supported the principle of an MFRA response of ‘attending at least 90% of life risk incidents within a given time period’. People were concerned about the slower response of the second appliance but accepted it was not unreasonable. Unanimous support was recorded for “the first appliance to attend at least 90% of all life risk incidents within 10 minutes”.

### **4. “Shift System, Work Routine and Firefighter Productivity”**

The 2 2 4 shifts system was explained and the inefficiencies of the considerable ‘downtime’ on a 15 hour night shift. The 1800hrs shift change time disrupts late afternoon presentations and protection work. Participants were almost unanimous the current shift system should be changed and the 12 and 24 hour options be considered.

### **5. Knowsley Merger & Closure Consultation**

The meetings were informed of the wide range of options considered by MFRA to reduce expenditure including LLAR, day crewed stations, community retained, station closures and mergers. Financial constraints, reducing incident numbers, fire station coverage and populations were illustrated and discussed.

Proposal to merge 2 stations into one new centrally located purpose built site with one wholetime and one wholetime retained appliance was explained. Discussion made clear that MFRA would not be considering these proposals if not facing an urgent need to reduce funding. An overwhelming majority supported the proposals.

Those who participated were keen that MFRA still maintain targeted Prevention and Protection work targeted at those most in need. This will remain a priority for MFRA.

Where we cannot meet the ten minute response standard in areas where we are proposing mergers we will:

Increase Prevention and Protection intervention for vulnerable people

Enter into reciprocal agreements with neighbouring FRS eg. Cheshire FRS in Cronton area.

### **6. Further Merger & Closure Consultations**

Consultation is about to commence, in October 2014, on merging Upton and West Kirby Fire Stations into a new centrally located station in Greasby and in November on the closure of Allerton Fire Station in Liverpool.

Consultation will take place in the future on the merger of St Helens and Eccleston Fire Stations to a new location in the Town Centre and possible further mergers or closures in Liverpool District.

All stakeholders including local residents, staff, partner agencies and Local Councils will be fully consulted in a similar format to the Knowsley Consultations.

### **IRMP 2013/16 Consultation Points**

**7. “Re-defining response times (for example, adopting a single response standard of, say, ‘attending 90% of life incidents with at least one fire engine within eight minutes’)”**

eight-in-ten participants supported the adoption of a single response standard of **“attending 90% of life incidents with at least one fire engine within eight minutes “providing it continues to endeavour to get to incidents as quickly as possible**

**8. “Introducing alternative crewing systems to match variations in ‘demand’”**

The vast majority of participants across all five forums thought that MFRA should consider more flexible crewing systems to match variations in demand

**9. “Reducing support services (including prevention and protection activities)”**

A majority of participants agreed that, given its diminishing resources, MFRA should target its prevention work towards higher risk areas, higher risk people (in low risk areas), and areas that have slower response times.

Charging for providing smoke alarms in low risk/affluent areas was also endorsed by a large majority, who felt that those who can afford to pay should expect to have to do so *(note this is dealt with in more detail in the EIA document “Support Staff Review to EIA” attached to this report)*

**10. “Raising council tax levels beyond the capping level.”**

Although several participants felt that they themselves could support a large council tax rise, it was widely felt that the population at large would not do so in the current economic climate

There was also concern that a large Council Tax increase could set two undesirable precedents – that is, it could:

- Be a precedent for other authorities to make similar increases in Merseyside
- Encourage central government to think that more central taxation could be transferred to the local level.

Even those participants who supported the idea of an increase felt that the MFRA would not win the five referendums needed to authorise such a policy

*(note this is dealt with in more detail in the EIA document “Proposals to raise Council tax EIA” attached to this report)*

The outcomes of the public consultation have been taken into consideration when developing proposals in the IRMP. The key points raised by the public were :

- No closure of fire stations
- Change crewing and rotas to be more flexible to meet demand
- Standardise response times and be transparent about remote areas with slower response times



- Reduce support staff resources where they are not focused on high risk activities

## 6. Conclusions

On reviewing the research, data and consultation together with the proposals outlined in section 1 above, it is envisaged that there will be very little negative impact on any particular protected group and no perceived disproportionate service delivery compared to the current level of service received by these groups currently.

We will increase prevention and protection work in areas affected by mergers and closures by intelligently targeting those people identified as vulnerable.

We will explore possibilities of working with our neighbouring partners to assist with Fire and rescues in areas where mergers and closures are proposed.

### (a) Age

#### Service Delivery in relation age :

- The majority of Merseyside population will see little or no difference to the way in which we are planning to deliver our service compared to their levels of service they currently receive; regardless of our chosen option.

#### Community risks in relation to age :

- Older people have been identified as more at risk from fire. As a result, prevention activity will continue to be targeted towards them.
- Middle aged men living alone have been identified as more risk from fires. As a result, prevention activity will continue to be targeted towards them.
- Young people are more likely to be involved in fires relating to anti-social behaviour. As a result, prevention activity will continue to be targeted towards them.

Delivery plans and service plans will continue to plan for innovative and efficient ways to engage with different communities of different ages to ensure that all emergencies receive the same high level of response.

### (b) Disability including mental, physical and sensory conditions)

#### Service delivery in relation to disabled people

- It is not envisaged that the impact of the changes on either proposal 1 or proposal 2 will have any significant detrimental impact on disabled people. Option 1 would ensure that disabled vulnerable people at risk of fire and life risk incidents will get the fastest and most efficient response which is critical to those with significant health complications. The ability to maintain community fire stations and link closely with disabled community groups is key

- The way in which MFRA classifies disabled people as high risk will not change and we will ensure that their needs in relation to Fire and Rescue services will be met. Services and policies will continue to take into account their needs of this group.

#### **Community risks in relation to Disability**

- People with disabilities have been identified as more at risk from fire occurring and in some cases, less able to escape when a fire does occur. Further consultation with Disabled People will be carried out during the lifespan of the IRMP to establish their experiences and impacts of the service changes.
- Hate crime involving fire as a weapon targeted at people with mental and physical disabilities will be monitored throughout the life of this IRMP to establish where further prevention and protection can be targeted

Community delivery plans and service plans will continue to plan for innovative and efficient ways to engage with different disability groups and support agencies to ensure that all emergencies receive the same high level of response.

#### **(c) Race (include: nationality, national or ethnic origin and/or colour)**

##### **Service delivery in relation to race**

- It is not envisaged that the impact of the changes in either proposal 1 or proposal 2 will have any significant detrimental impact on different ethnic groups. Option 1 would ensure that those at risk of hate crime and fire and life risk incidents will get the fastest and most efficient response. The ability to maintain community fire stations and link closely with different ethnic minority groups is key to ensuring the service we provide meets the needs/risks of the communities.

##### **Community risks in relation to race**

- Some minority ethnic communities have been identified as being at greater risk from fire and where we identify this we will work with those communities to target prevention activity.
- Racial differences can place people at increased risk of hate crime and this can include the use of fire as a weapon. Our prevention and protection work with the police and other partners helps people to protect themselves and assists in the prevention of such crimes. Monitoring of such incidents will be key to understanding the needs and experiences of these community groups.

Community delivery plans and service plans will continue to plan for innovative and efficient ways to engage with different ethnic minority groups and support agencies to ensure that all emergencies receive the same high level of response.

#### **(d) Religion or Belief**

##### **Service Delivery in relation to Religion/belief**

- Merseyside is predominantly Christian (79%) and less diverse in terms of religion

than the rest of UK. We are not aware of any particular religious groups that will be affected disproportionately either by either option 1 or 2 or changes to the response time.

#### **Community risks in relation to religion/belief**

- Some religious groups have been identified as being at greater risk from fire and where we identify this we will work with those communities to target prevention activity.
- Religious differences /tensions between groups can place people at increased risk of hate crime and this can include the use of fire as a weapon. Our prevention and protection work with the police and other partners helps people to protect themselves and assists in the prevention of such crimes. Monitoring of such incidents will be key to understanding the needs and experiences of the different faith groups.

Community delivery plans and service plans will continue to plan for innovative and efficient ways to engage with different faith groups and support agencies to ensure that all emergencies receive the same high level of response.

#### **(e) Sex (include gender reassignment, marriage or civil partnership and pregnancy or maternity)**

##### **Service Delivery in relation to Gender**

- It is not envisaged that the impact of the changes in either proposal 1 or proposal 2 will have any significant detrimental impact on different genders. Option 1 would ensure that those at risk of fire and RTC will get the fastest and most effective response. The ability to maintain community fire stations and link closely with different gender groups is key to ensuring the service we provide meets the needs/risks of the communities.

##### **Community risks in relation to Gender**

- There is evidence to suggest that men are generally more at risk from fire and road traffic collisions. We regularly monitor the fires where people die and older women tend to be the highest risk group. As a result, prevention activity will continue to targeted towards these groups at risk

Community delivery plans and service plans will continue to plan for innovative and efficient ways to engage with different gender groups and support agencies to ensure that all emergencies receive the same high level of response.

#### **(f) Sexual Orientation**

##### **Service delivery in relation to Sexual Orientation**

- It is not envisaged that the impact of the changes to service delivery in either proposal 1 or proposal 2 will have any significant detrimental impact on people from different sexual orientation. Option 1 would ensure that those at risk of fire and RTC will get the fastest and most effective response. The ability to maintain community fire stations and link closely with different LGBT groups is key to ensuring the service we provide meets the needs/risks of these communities.

**Community risks in relation to Sexual Orientation**

- Lesbian, Gay, Bisexual and Transsexual people can be at an increased risk from hate related crime and this might include the use of fire as a weapon. Our prevention and protection work with the police and other support agencies helps people to protect themselves and assists in the prevention of such crimes.

Community delivery plans and service plans will continue to plan for innovative and efficient ways to engage with different LGBT groups support agencies to ensure that all emergencies receive the same high level of response.

**(g) Socio-economic disadvantage**

We have extensive business intelligence which shows that socio-economic disadvantage is significant risk factor in relation to all types of fire. As a result many of our prevention activities focus on those areas with the highest levels of deprivation ( 40% of Merseyside is in the top 5% most deprived areas in England)

## 7. Decisions

*If the policy/report/project will have a negative impact on members of one or more of the protected groups, explain how it will change or why it is to continue in the same way. If no changes are proposed, the policy/report/project needs to be objectively justified as being an appropriate and necessary means of achieving the legitimate aim set out in 1 above.*

The information provided in sections 1 to 6 explain the ways in which different protected groups may be affected by the aims and objectives set out in the IRMP, specifically the proposed changes to service as a result of the significant reduction in funding by the government.

Option 1 provides the best support for all protected groups and helps to maintain and increase community engagement whilst maintaining current standards in responses to fire and rescue.

## 8. Equality Improvement Plan

*List any changes to our policies or procedures that need to be included in the Equality Action Plan/Service Plan.*

## 9. Equality & Diversity Sign Off

***The completed EIA form must be signed off by the Diversity Manager before it is submitted to Strategic Management Group or Authority.***

Signed off by:

Wendy Kenyon

Date:

15/10/14

Comments :

Action Planned	Responsibility of	Completed by
1.Ensure that Low Risk HFSC's are carried out as a priority to the areas where 10 minute response time may not be fully met 2. Consider increasing	Knowsley Community Safety Teams	

<p>community interventions early in 14/15 for the areas where 10 minute response times may not be met :</p> <p>3. Engage with neighbouring FRA's to establish opportunities to cover areas affected by rescue responses.</p> <p>4. Continue to establish innovative and efficient ways to engage with all the protected groups</p> <p>5. Monitor hate crime in relation to fire and each protected group</p>		
--	--	--

For any advice, support or guidance about completing this form please contact the [DiversityTeam@merseyfire.gov.uk](mailto:DiversityTeam@merseyfire.gov.uk) or on 0151 296 4237

**The completed form along with the related policy/report/project document should be emailed to the Diversity Team at: [DiversityTeam@merseyfire.gov.uk](mailto:DiversityTeam@merseyfire.gov.uk)**