



IRMP Steering Group Integrated Risk Management Planning: Policy Guidance

Equality and Diversity



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Planning: Policy Guidance

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Contents

Section 1: Introduction	5
Section 2: Scope	8
Section 3: Risk Analysis	9
Section 4: Strategies	10
Section 5: Delivery Mechanisms	14
Section 6: Monitoring and Review	17
Annex A: Legislation	18

Document Status

This guidance has been published by Communities and Local Government on behalf of the IRMP Steering Group.

Representatives on the Steering Group include the Chairs of the Practitioners and Business and Community Safety Fora, Chief Fire Officers Association (CFOA), Confederation of British Industry, Health and Safety Executive, Local Government Association, Fire Protection Association, and the three main uniformed representative bodies as well as other key stakeholders from the “fire industry”.

Communities and Local Government are of the view that an Integrated Risk Management Plan (IRMP) is best produced and implemented at a local level based upon local needs, but consider that these chapters of policy guidance will assist in ensuring a consistency in approach and quality in the way that IRMPs are produced. For the avoidance of doubt this guidance is not mandatory and has been made available for Fire and Rescue Authorities (FRAs) to use, should they wish to, in the development of themed areas of IRMP.

Section 1

Introduction

- 1.1 There is a societal expectation that Fire and Rescue Authorities (FRAs), like all public services, should reflect the communities that they serve. An added benefit of having a diverse workforce is that the FRA will find it easier to access and understand local communities in providing services such as community fire safety.
- 1.2 This chapter provides guidance and assistance to FRAs with regard to mainstreaming equality and diversity in developing IRMPs.
- 1.3 Valuing and promoting equality and diversity are central to the work of the Fire and Rescue Service (FRS) in England. The ability to protect the public through fire safety advice, fire prevention, fire protection and emergency response depends on understanding the differing needs of the diverse communities and responding appropriately to those needs.
- 1.4 The FRS Equality and Diversity Strategy¹ published on 20th May 2008 underlines the importance of equality and diversity to the Service and places clear requirements on FRAs with regard to the actions they must take to improve their performance in these areas. The mainstreaming of equality and diversity at the beginning of the planning process should help FRSs to assess and analyse local risks in different sections of the community and identify the actions best designed to reduce and limit the impact of fire and other emergencies on those communities. The strategy identifies the importance of ensuring that equality and diversity are integral to the IRMP process stating that FRAs must:

“ensure that the Integrated Risk Management Plan (IRMP) takes full account of the needs of local communities and that all aspects of the planning process have been effectively equality impact assessed”.

¹ The FRS Equality and Diversity Strategy is available at:
<http://www.communities.gov.uk/publications/fire/equalitydiversitystrategy>

1.5 The importance of equality and diversity considerations are not, however, limited to the outward facing aspects of the Service. Equality and diversity considerations need to be central to FRS plans and resources for a wide range of issues including recruitment, development, training, procurement and capital expenditure, for example:

- encouraging applicants from diverse backgrounds to apply to the Service may require the allocation of greater resources to positive action or awareness raising programmes
- ensuring women firefighters are able to carry out their role safely and effectively requires procurement processes which provide for the supply of PPE designed specifically for women to wear
- recruiting and retaining staff from different faith backgrounds may require capital provision to ensure a quiet room appropriate for prayer is provided.

1.6 A survey of current and ex-firefighters in England² shows that a significant number of women still did not have access to separate facilities at work. Comments in the questionnaire highlighted that this was not just an issue for women, but also one that affected men.

“It’s just as embarrassing to males to have to share locker rooms and other facilities. None of the training facilities in [my Service] have separate locker rooms.”

Man; age withheld

1.7 The data from the survey showed that only 45 per cent of women respondents reported that Personal Protective Equipment (PPE) had been specifically designed for women. In addition, only 15 per cent said they had boots and 14 per cent said they had gloves that were specifically designed for women. This is presented in Table 1.

Table 1: Proportion of women with work gear specifically designed for women (percent)

Facilities	Total	Wholetime	Retained
PPE	45	48	28
Boots	15	18	11
Gloves	14	14	12
Work wear	56	56	42

² A survey of current and ex-firefighters in England - Fire Research Technical Report 8/2008 can be accessed at: <http://www.communities.gov.uk/publications/fire/frtp82008>

- 1.8 Women were also asked in the survey about their manager's response to being told they were pregnant. More than three-fifths of those who had been pregnant while working as an operational firefighter reported that their manager "handled the situation very well" (61%) and almost three-quarters of women (73%) reported that their line manager was "happy" or "pleased" for them, was "sympathetic or supportive" (40%) and discussed arrangements for maternity leave "in a positive way" (36%). More than two-fifths of women (42%) reported that they were given "a less demanding job" and almost one half of women reported that a risk assessment was conducted (47%).

Section 2

Scope

Legislation

- 2.1 As a public body the FRA has a duty to assess and disclose the expected impact of policies, plans, strategies and functions on race, disability and gender. Good practice encourages the extension of this duty to cover all equality strands.
- 2.2 Those involved in the IRMP process whether their area of responsibility is front line service delivery, estate management or any other FRS business area need to be aware of the provisions of equalities legislation, in particular the specific public sector equality duties and how they apply to the FRS. They need to ensure that in developing their plans, policies and procedures they are complying with all the legislative requirements.
- 2.3 Brief descriptions of the key legislative provisions are given in Annex A.

Section 3

Risk Analysis

3.1 FRAs will wish to ensure that community fire safety activities they undertake are targeted at those most at risk. The IRMP chapter on community safety provides comprehensive guidance and signposting on the assessment of community risks including:

- Assessing the level of dwelling fire risk
- Assessing impact of fire and rescue cover on dwelling fire risk, and vice versa
- Supporting geographic targeting of resources, especially Community Fire Safety (CFS)
- Supporting household level targeting of CFS
- Establishing the association between fire and wider social, criminal and health issues – in support of partnership working and social agendas.

3.2 This risk analysis process will be more effective when the FRS has a detailed awareness and understanding of the diverse demographic profile within its area.

Section 4

Strategies

General

4.1 The purpose of this document is to provide guidance on achieving planning outcomes which support and promote equality and diversity and ensure that consideration of these issues form an integral part of the planning process both for internal provisions (employment practices, procurement, estates management etc) and in the service delivered by the FRS.

4.2 Those involved in the development of the IRMP should ensure that:

- Where plans will impact on service delivery there is effective consultation and engagement with the public, in order to:
 - identify the specific needs of all groups within the local community
 - identify the likely effect of proposed plans on these different groups
 - ensure proposed plans are reviewed in the light of the information received to ensure effective service delivery for all groups.

(Note: there are specific requirements to actively involve, not just consult with, people with disabilities in the development of plans and policies which will affect them)

- Local FRS managers, frontline staff and equalities professionals are involved and consulted in the development of the IRMP so that:
 - the practical and local knowledge of front line staff on community needs is taken into consideration, and
 - a full equality impact of the proposed plans has been identified.
- Where plans will impact on FRS employees, staff and their representative bodies they are consulted in order to:
 - determine if there will be any adverse impact on different groups of staff, and
 - ensure plans are reviewed and modified to reduce any identified adverse impact on any particular staff group.
- Information gained through consultation is used to undertake effective equality impact assessment of all the policies, plans, processes and procedures being developed to support and deliver the IRMP. It is vital that this assessment is undertaken at the commencement of the development process and is integral to

each stage of development. Equality impact assessment should never be left until plans or policies are finalised – it should be used as a tool to support and inform the development process.

Equality Impact Assessment

4.3 An Equality Impact Assessment examines a proposed or existing policy, plan, strategy or project to identify what effect its implementation may have on different groups in the community. It can anticipate and recommend ways to avoid any discriminatory or negative consequences for a particular group on the grounds of race, gender, disability, faith, sexuality or age. It also enables the FRS to identify and demonstrate the potential benefits for target groups arising from a proposed policy or project.

4.4 Benefits of impact assessment:

- It is a useful business planning and evaluation tool
- It will ensure FRAs meet their statutory requirements on equality and diversity
- It can assist in reviewing and streamlining policies, plans, procedures
- It supports treating staff fairly
- It can enhance value for money
- It can improve relations and dialogue with the community
- It can improve partnership working
- Overall it may improve service delivery.

4.5 Given below are some examples of how equality impact assessment has been used to identify an issue and develop an effective solution:

Reduction of incidence of fire in the traveller community – London

The increased vulnerability of those in the Traveller community to fires was identified in Hillingdon in London. Working with the community it was identified that their understanding of effective fire safety prevention was very low. Funding was provided to improve the understanding of fire safety issues and a fire safety leaflet was designed specifically for Travellers. This interaction not only improved fire safety awareness among the local Traveller community but also created a more positive relationship between the Service and the Travellers.

Improved fire safety provision for the deaf community – Hertfordshire

The difficulty of providing effective fire safety advice to many deaf people in the community was identified within Hertfordshire. Several staff undertaking fire safety duties were trained in sign language to improve communication and a programme was set up to install specialist smoke alarms.

Community Empowerment (Consultation and data collection)

4.6 FRAs should consult widely to increase the opportunities for hard to reach groups (e.g. specific community groups, often excluded groups such as Lesbian, Gay, Bisexual & Transgender (LGB&T), refugees and asylum seekers, Gypsies and Travellers, migrant workers, the elderly etc.) to be involved in the IRMP development process. This will ensure that the IRMP draws on the widest possible range of data and views and represents the best possible response to local needs.

4.7 IRMP guidance Note 2³ provides advice to FRAs on the consultation arrangements the Government expects to be undertaken when developing an IRMP for their area and in implementing the outcomes from that process. FRAs should continue to have regard to this guidance. Communities and Local Government would, for the purposes of ensuring greater community empowerment, emphasise that:

- The IRMP consultation exercise should be planned and managed to ensure key groups are reached, the consultation timetabled properly, the aims are clearly stated and an explanation of the exercise given to the people involved
- Consulting and collecting relevant data will ensure that FRAs target their work effectively so that resources are targeted at those at greatest risk (see earlier comments on risk analysis)
- Consultation should enable communities to make informed choices on the suggested proposals and allow FRAs to consider those views. This will ensure that the community feels greater involvement in the IRMP
- Consultation results should be published and fed back into the planning and decision making processes in an open and responsible way.

4.8 When planning consultation, consider the following:

- Who is directly affected by the policy/service or decision?
- What relevant groups have an interest in the policy/service or decision?
- How can you ensure that the above groups are consulted?
- How will you make information available to those consulted?
- Will the information be accessible to all groups, including those with disabilities and those from minority ethnic communities?
- Do any barriers exist to effective consultation with each of the identified groups?

³ www.communities.gov.uk/fire/developingfuture/integratedriskmanagement/214682/

Partnership working

- 4.9 Those involved in the IRMP process should consider partnership working with other emergency services, Community and Voluntary Sector organisations, Local Strategic Partnerships, Faith Communities, and other stakeholders. This will enable FRSs to reach varying hard to reach groups, develop intervention strategies as required, share good practice and in turn deliver their own IRMP objectives. This is also discussed further in the Community Safety Chapter.

Section 5

Delivery Mechanisms

5.1 The following are some good practice examples of equality and diversity delivery mechanisms.

Recruiting advocates

5.2 Community Fire Advocates are individuals who have been employed by the FRS to access specific groups within the community. These groups will have been identified by the FRS as being more likely to be involved in a fire and/or least likely to access the services provided by the FRS. The advocates tend to have prior work experience with the specific section of the community in question, such as Care Workers, or have specific skills, such as being able to speak other languages.

5.3 FRAs may wish to consider recruiting advocates and training them to develop and deliver specialist knowledge and skills on themes such as working with individual ethnic groups, the elderly, supporting those with disabilities, engaging with migrant workers, Gypsies and Travellers or others as identified in your initial consultation and risk analysis. This interaction through advocates with specific skills will increase the effectiveness of home safety activities and other priorities within target groups.

Example:

- Merseyside Fire and Rescue Service already have advocates working in the following communities: Bilingual advocates serving Yemeni, Somali, Chinese, Asian and Arabic speaking communities; older peoples advocates; disability advocates; deaf advocates; Asylum and Refugee advocate; alcohol and substance misuse advocates; and similarly community fire safety advocates attend a collaborative drop-in for the LGB&T communities of Merseyside, in conjunction with Merseyside Police.

5.4 A research report⁴ on Understanding peoples' attitudes towards fire risk, which includes analysis and conclusions on the work of community advocates, is due to be published in Autumn 2008.

⁴ Understanding peoples' attitudes towards fire risk, R. Smith, M. Wright, A. McMahon and A. Tobierre

Partnership working

- 5.5 Working in partnership with other services can ensure early interventions with at risk groups. For example setting up partnerships with Primary Care Trusts and/or Age Concern could help FRSs reach larger numbers of elderly and vulnerable people. This would mean identifying and developing partnerships with agencies that can provide links to these groups. Other IRMP guidance chapters provide examples of the development of partnership working in their respective subject areas.

Procurement

- 5.6 As indicated in paragraphs 1.5 to 1.7 FRSs will need to consider equality and diversity in their procurement arrangements on matters such as:
- Provision of firefighting appliances and equipment
 - Provision of personal protective equipment and corporate wear
 - Building estate strategies and implementation.

Example:

- London Fire Brigade organise 'Meet The Buyer' events that target small and medium size and minority owned business to provide information on how to do business with the FRS. They monitor all suppliers requesting information on their workforce composition and how they positively promote equality of opportunity and engage with local communities.

Workforce monitoring

- 5.7 In order to ensure equality and diversity it is important to monitor and review the FRA's workforce. To do this, all employees should be asked questions on all six diversity strands (Race, Disability and Gender, Age, Religion or Belief and Sexual Orientation) and the data should be analysed and reviewed and if necessary, action taken.

Example:

- London Fire Brigade monitors its workforce asking questions on all six diversity strands. It also requests monitoring information from all new employees. The data is used to monitor whether development, training or promotion systems discriminate or adversely impact on any diversity group.

External guidance

- 5.8 The Equality and Human Rights Commission champions equality and human rights for all, working to eliminate discrimination, reduce inequality, protect human rights and to build good relations, ensuring that everyone has a fair chance to participate in society. Guidance is available at:
www.equalityhumanrights.com/en/Pages/default.aspx
- 5.9 The Equalities and Cohesion team at the Improvement and Development Agency (IDeA) provides up-to-date information on equality policy and practice, such as where to find evidence and data, guidance on legislation and examples of good practice. Guidance is available at:
www.idea.gov.uk/idk/core/page.do?pagelId=5145172

Section 6

Monitoring and Review

- 6.1 Reference should be made in the IRMP to the requirements for evaluation and sharing of good practice within the Equality and Diversity Strategy and the respective roles and responsibilities of Communities and Local Government and FRSs.
- 6.2 Reference should be made to the IRMP chapter on community safety for details of the suggested arrangements for monitoring and reviewing this aspect of FRS service delivery.
- 6.3 FRSs should also ensure they have effective arrangements in place to assess and evaluate the impact of equality and diversity policies both internally and externally with respect to fulfilling their obligations to undertake equality impact assessments (see paragraph 4.2 – 4.4).
- 6.4 FRSs will also wish to build upon these monitoring arrangements to ensure they are able to monitor and review local progress of their strategies in delivering against the FRS Equality and Diversity Strategy 2008.

Annex A

Relevant legislation

1. Equal Pay Act 1970

Entitles an individual to the same contractual pay and benefits as a person of the opposite sex working in the same employment and doing equal work or work of equal value.

www.opsi.gov.uk/acts/acts1970/PDF/ukpga_19700041_en.pdf

2. Sex Discrimination Act 1975

Prohibits sex discrimination against individuals in the areas of employment, education, and the provision of goods, facilities, services and premises

www.opsi.gov.uk/acts/acts1975/PDF/ukpga_19750065_en.pdf

3. Race Relations Act 1976

Makes discrimination on grounds of race unlawful in the areas of employment, education, and the provision of goods, facilities, services, and premises.

www.statutelaw.gov.uk/legResults.aspx?LegType=All%20Primary&PageNumber=1&BrowseLetter=R&NavFrom=1&activeTextDocId=2059995

4. Disability Discrimination Act 1995

Prohibits discrimination against disabled people in the areas of employment, provision of goods, facilities, services and premises, education and transport.

www.opsi.gov.uk/acts/acts1995/ukpga_19950050_en_1

5. Human Rights Act 1998

Anyone who feels that their rights have been breached by a public authority under the Act can take the authority to court. www.opsi.gov.uk/ACTS/acts1998/ukpga_19980042_en_1

6. Sex Discrimination (Gender Reassignment) Regulations 1999

Provides protection from discrimination to those who have undergone, are currently undergoing, or intend to undergo, gender reassignment on the grounds of sex, in matters of pay and treatment in employment and vocational training

www.opsi.gov.uk/si/si1999/19991102.htm

7. Race Relations Amendment Act 2000

Places a general duty on public authorities to promote race equality throughout all their functions www.opsi.gov.uk/acts/acts2000/ukpga_20000034_en_1

8. Part time Workers Regulations 2000

Ensures that all part time workers are entitled to equal terms and conditions of employment as full time workers. www.opsi.gov.uk/si/si2000/20001551.htm

9. Employment Equality (Religion or Belief) Regulations 2003

Make it unlawful for an employer to discriminate against or harass a job applicant or employee on grounds of religion or belief (defined as any religion, religious belief or similar philosophical belief) www.opsi.gov.uk/si/si2003/20031660.htm

10. Employment Equality (Sexual Orientation) Regulations 2003

Make it unlawful for an employer to discriminate against or harass a job applicant or employee on grounds of their sexual orientation or perceived sexual orientation (defined as sexual orientation towards persons of the same sex, opposite sex or same sex and opposite sex). www.opsi.gov.uk/si/si2003/20031661.htm

11. Disability Discrimination Act (Amendment) Regulations 2003

All employers and service providers have to make reasonable adjustments to physical features of their premises to overcome any barriers to access. www.opsi.gov.uk/si/si2003/20031673.htm

12. Civil Partnership Act 2004

Allows same-sex couples to make a formal, legal commitment to each other by forming a civil partnership giving them with the same rights and responsibilities as opposite sex couples who enter into a civil marriage.

www.opsi.gov.uk/acts/acts2004/ukpga_20040033_en_1

13. Gender Recognition Act 2004

Allows transsexual people to apply for full legal recognition in their acquired gender. The Act also defines an individual's gender history as protected information, prohibiting employers from disclosing it. www.opsi.gov.uk/acts/acts2004/ukpga_20040007_en_1

14. Employment Equality (Age) Regulations 2006

Prohibits discrimination on grounds of age in employment and training and provide greater rights for employees with regard to requesting to work beyond the normal age for retirement. www.opsi.gov.uk/si/si2006/20061031.htm

15. Equality Act 2006

Includes the creation of the Equality and Human Rights Commission. The Act makes it unlawful to discriminate on grounds of religion or belief or sexual orientation in the provision of goods, facilities and services the management of premises, education and the exercise of public functions. It also places a positive duty on public authorities to promote equality between genders throughout all their functions.

www.opsi.gov.uk/acts/acts2006/pdf/ukpga_20060003_en.pdf

Gender and gender identity

The Equality Act 2006 places a duty on public authorities to promote gender equality in all their functions.

The *general duty* includes the requirement to eliminate unlawful discrimination, eliminate harassment, and promote equality of opportunity.

The *specific duties* include the requirement to:

- publish a Gender Equality Scheme, which is the central framework to help achieve the general duty
- conduct impact assessments for gender equality.

Employment duty: public authorities need to ensure that they have due regard to the need to eliminate unlawful discrimination and harassment in their employment practices and actively promote gender equality within their workplace. This includes discrimination on grounds of gender reassignment. They also need to consider the need to include objectives to address the causes of any gender pay gap (Equal Pay Act 1970)

Public Authorities are responsible for ensuring all functions carried out by external suppliers meet the general duties of the Act.

The first scheme had to be published by 30 April 2007, and must be reviewed and revised every three years.

Public Authorities must report on progress annually.

Race

The Race Relations (Amendment) Act 2000 places a duty on public authorities to promote race equality in policy making, service delivery, regulation and employment.

The *general duty* is a requirement to: eliminate unlawful racial discrimination, promote equality of opportunity, and promote good race relations between different racial groups.

The specific duties include:

- Public authorities within England and Wales to publish a Race Equality Scheme.
- The requirement to conduct an assessment of the impact of their current or intended policies, programmes and service delivery for any disadvantageous experiences or outcomes of minority ethnic groups and to take action to remove inequalities

- Public Authorities are responsible for ensuring all functions carried out by external suppliers meet the general duties of the Act
- *An employment duty:* to monitor the numbers of staff by reference to racial groups in relation to: staff in post, applicants for employment, training and promotion, those in receipt of training, benefit or detriment suffered as a result of performance assessment procedures, involved in grievance procedures, are subject to disciplinary procedures, and those who leave. Authorities should analyse the data to find patterns of inequality, take necessary action to remove barriers and promote equality of opportunity and publish the results of the monitoring each year.

The first scheme had to be published by 31 May 2002, and is required to be reviewed every three years. There is no statutory requirement to report annually on race equality; however, it is good practice to do so. Annual publication of employment monitoring statistics is however required.

Disability

The Disability Discrimination Act 2005 places a duty on public authorities to promote disability equality in policy making, service delivery, regulation and employment.

The general duty includes: promotion of equality of opportunity between disabled persons and other persons, elimination of unlawful disability discrimination, elimination of unlawful disability harassment, promotion of positive attitudes towards disabled persons, encouraging participation of disabled persons in public life, and taking steps to take account of disabled person's disabilities, even where that involves treating disabled persons more favourably than others.

The specific duties require:

- Public sector authorities were required to publish a Disability Equality Scheme by December 2006. This should form the main framework to help them in achieving the general duty
- Schemes are required to include arrangements for impact assessment with regards to disadvantageous experiences or outcomes of people with disabilities
- *Employment:* Public authorities must also set out arrangements for gathering information on the effect of their policies and practices on the recruitment, development and retention of their disabled employees. They are required to collect statistics on disabled applicants for employment, staff in post, employees who cease employment, those who receive training, suffer detriment as a result of performance assessment, are involved in grievance procedures, are subject to disciplinary procedures. Authorities should analyse the data and consider where there are differences between disabled and non-disabled staff, investigate the reasons for this, and take action to remedy it

- Public Authorities are responsible for ensuring all functions carried out by external suppliers meet the general duties of the Act.

Disability Equality Schemes must be reviewed every three years. Public Authorities are required to publish a report annually.

There is a requirement that public authorities to involve disabled people in all key aspects of the development of their schemes. There is also a requirement to involve (not just consult) disabled people in the development of policies, practices, procedures etc which may have an impact upon them.

The DDA 1995 also sets out the requirement of public authorities to provide reasonable adjustments for disabled people where a provision, criterion or practice applied by the employer places a disabled person at a substantial disadvantage compared with people who are not disabled

Note: Although the specific duties require public authorities to conduct impact assessments for race, disability and gender it is good practice to assess for an adverse impact across all equality strands (i.e. to include Age, Religion or Belief and Sexual Orientation). It is also good practice to monitor employment data across all equality strands, exceeding the statutory requirements of just Race, Disability and Gender.

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