



## Equality Impact Assessment [EIA]

### 1. Name and outline of policy proposal, guidance, or operational activity

#### **Title: Minimum Service Levels for Fire and Rescue Services**

The Strikes (Minimum Service Levels) Act received Royal Assent on 20 July 2023. It provides a power for relevant secretaries of state to make regulations setting out minimum levels of service to be provided on strike days in six key sectors:

- Health services;
- Fire and rescue services;
- Education services;
- Transport services;
- Decommissioning of nuclear installations and management of radioactive waste and spent fuel; and
- Border security.

The Act provides that, once regulations have been laid for relevant sectors, an employer will be able to issue a 'work notice' to a trade union identifying the staff required to work on a strike day in order to meet the minimum service level (MSL) and setting out the work they would be required to do. Such work notices must not identify more workers than would be reasonably necessary in order to provide the level of service set out in the relevant sector's MSL regulations.

Fire and rescue services (FRSs) have a critical role in responding to incidents that can put lives, property, or the environment at risk. To maintain public safety, it is vital to ensure that the public remain able to access fire and rescue services when they need them. Levels of cover provided by FRSs on strike days are currently dependent on FRS business continuity plans, voluntary agreements with unions and arrangements for military or private contractors to provide defensive firefighting capabilities. This can lead to uncertainty and variation in the levels of cover provided on strike days in different parts of the country.

The Government therefore launched a consultation on MSLs for FRSs on 9 February 2023. The consultation ran for 13 weeks, and invited comments on which of the services provided by FRSs should be included in any MSL and on the most suitable approach for setting and delivering MSLs for the sector.

Evidence from the consultation and from stakeholder engagement work undertaken in parallel has been integral in shaping MSL policy for the sector and developing the Strikes (Minimum Service Levels: Fire and Rescue Services) (England) Regulations 2024. The intention of these regulations is to ensure there is an appropriate balance between the ability of the public to

access fire and rescue services where necessary and the ability of fire and rescue service staff to take strike action.

The regulations stipulate that, on each day of a strike, an emergency incident response must be provided to calls for help that are assessed as requiring an FRS response as if it were a non-strike day. They define a minimum level of service for:

- **Control rooms**, which must be able to answer and assess all emergency calls and fulfil their usual functions in dispatching an emergency response where appropriate. Individual fire and rescue services will be able to determine how best to ensure these services can be delivered and how many employees will need to be included on work notices in order to meet the MSL.
- **Emergency incident response**. Each FRS must have 73% of the appliances and vehicles available that would be available on a non-strike day, and national resilience assets must be available as if a strike were not taking place. FRSs will also need to provide management, control, or direction of these appliances as they would on a non-strike day. Following consultation with unions, individual FRSs will be able to decide how many firefighters they consider to be necessary to crew this proportion of appliances on strike days.
- **Fire safety**. In the FRS MSL regulations, fire safety services are defined as those intended to reduce the risk of an incident arising that requires an emergency response. Requests for fire safety services must be answered and assessed as if a strike were not taking place and a response organised and provided if same-day action is required. Incidents requiring a response on the same day could include notification of a blocked fire exit in licensed premises or a serious fire safety defect in a residential building that requires enforcement action. Individual FRSs will be able to determine how many staff they consider necessary to provide this level of fire safety service provision on a strike day.

In line with the Public Sector Equality Duty (PSED), this Equality Impact Assessment (EIA) considers the likely equalities impacts of the MSL regulations for fire and rescue services. To reflect the territorial scope of the regulations, the evidence set out in the EIA relates to England only.

## **2. Summary of the evidence considered in demonstrating due regard to the Public Sector Equality Duty.**

To inform this EIA, evidence from the following data sources has been considered:

- Government statistics on [fires attended by fire and rescue services in England between April 2022 and March 2023](#)
- Government statistics on the [demographics of the fire and rescue service workforce in England in the year ending March 2023](#)

- Government research on [fire-related fatalities and severe casualties in England from 2010/11 to 2018/19](#)
- [Gold Book](#) - National Joint Council for Brigade Managers of Fire and Rescue Services, Constitution and Scheme of Conditions of Service
- [Green Book](#) - Local Government Terms and Conditions
- [Grey Book](#) - National Joint Council For Local Authority Fire And Rescue Services Scheme of Conditions of Service
- Data from the 2021 census on [unpaid care by age, sex and deprivation in England and Wales](#)
- Data from the 2021 census on [ethnicities of the working age population in England and Wales](#)
- [The Trade Union and Labour Relations \(Consolidation\) Act 1992](#)
- [The Equality Act 2010 and guidance.](#)

This EIA also incorporates evidence from the FRS MSL consultation and the stakeholder engagement work undertaken by the Home Office in parallel. The consultation included a question asking respondents to consider the potential positive and negative impacts of the various options on people with protected characteristics. Twenty responses were provided to this question, and these were taken into account as part of the policy development process.

### **3a. Consideration of limb 1 of the duty: Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Equality Act.**

#### **Age**

##### **Direct Discrimination**

The proposed approach to MSL regulations and existing compensatory measures (CMs) will not be directly discriminatory against any particular age group, as it will apply across the fire workforce irrespective of age.

##### **Indirect Discrimination**

##### **Workforce**

The fire and rescue workforce and pensions statistics covering the period from April 2022 to March 2023 in England<sup>1</sup> show that the staff groups most likely to be in scope of MSLs (namely, firefighters and control room staff) are likely to be younger than the staff for whom the measures would not apply (primarily FRS staff in support roles).<sup>2</sup> Firefighters and control room staff are employed under the Grey and Gold Books, while support staff are most likely to be employed under Green Book terms and conditions.

As of 31 March 2023, almost two thirds (65.4%) of Grey Book firefighters and control room staff were aged between 16 and 45, with a further 29.1% aged between 46 and 55 and just 5.5% aged 56 or over. This differs from the age profile of support staff, who are more likely to be older: 44.6% of support staff were aged 16-45, with a further 27.2% aged between 46 and 55 and 28.2% aged 56 or over. Gold Book staff are the oldest, with 26.2% aged 16 to 45, 64.8% aged 46-55 and 9.0% aged 56 or over.

Therefore, the staff who are more likely to be included on a work notice, namely firefighters and control room staff, are more likely to be in the younger age categories. The MSL could therefore arguably amount to indirect discrimination against younger members of staff as it will be more likely to affect them compared to older staff who are more likely to be employed as support staff for example.

However, while the staff most likely to be affected by MSLs tend to have a younger age profile than support staff, who are less likely to receive a work notice, we do not consider that this would amount to indirect discrimination against younger staff. We are not aware that the MSLs would put staff in this age group at a particular disadvantage compared with those in other age groups who are also subject to MSLs. FRSs have to comply with the Equality Act and work notices should not be issued with age characteristics in mind.

We do not consider that the varying degrees of access to the established CMs across those FRS staff groups with different fire terms and conditions will lead to any indirect discrimination between staff in different age groups. Staff of all ages have access to the CMs provided by the book they are employed under (Gold, Green or Grey), and staff under all three books have access to arbitration, the strongest existing CM, in national disputes. We have also recommended that employers offer the same CMs for local disputes as they

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<sup>1</sup> [www.gov.uk/government/statistics/fire-workforce-and-pension-statistics-year-ending-march-2023/fire-and-rescue-workforce-and-pensions-statistics-england-year-ending-march-2023](https://www.gov.uk/government/statistics/fire-workforce-and-pension-statistics-year-ending-march-2023/fire-and-rescue-workforce-and-pensions-statistics-england-year-ending-march-2023)

<sup>2</sup> The Grey Book refers to the National Joint Council for Local Authority Fire and Rescue Services' constitution and scheme of conditions and service. This covers firefighters and control room staff. <https://www.fbu.org.uk/sites/default/files/publications/Grey%20Book%20LO-RES.updated%202009.pdf> .

Gold book refers to the National Joint Council for Brigade Managers of Fire and Rescue Services' Constitution and scheme of conditions of service. This covers senior officers often referred to as brigade managers: <https://www.local.gov.uk/our-support/workforce-and-hr-support/fire-and-rescue-workforce-support/brigade-managers/gold-book>.

The Green Book refers to the National Agreement on Pay and Conditions of Service for local government services. This applies mainly to fire support staff. <https://www.local.gov.uk/system/files/2023-04/Green%20Book%20250422%20tracked%20version.pdf>

would for those that are national. The introduction of MSLs will not affect the range of CMs to which staff employed under each book have access. We also consider that the existing compensatory measures (CMs) for Gold, Green and Grey Book staff will mitigate against any negative impacts for younger people that result from the MSL policy, given that CMs compensate for the reduction in collective bargaining power that MSLs give rise to.

If any disadvantage is suffered by FRS staff in particular age groups, we consider this would be justified on the basis that this approach is a proportionate way of protecting public safety during periods of strike action.

## **Public**

From a public perspective we do not consider that the introduction of MSLs for FRSs will cause any unlawful discrimination against members of the public in any age group. Instead, the introduction of MSLs, could have the effect of giving those groups who are more likely than average to call on the fire and rescue service greater reassurance and ability to access fire and rescue services if needed during a period of strike action. Evidence indicates that, in general, older people are more likely to need support from fire and rescue services. In the year ending March 2023, 52% of the 232 fire-related fatalities and 23% of the 5,202 fire-related casualties were individuals over the age of 65.<sup>3</sup>

The proposed MSL level of 73% for firefighters offers more protection to the public and therefore will have a positive impact on those who are most vulnerable to fire-related fatalities and casualties, including the elderly. This point was raised in multiple consultation responses as a positive potential impact of the introduction of MSLs. The closer the MSL is to a business-as-usual level, the more protected these members of the public will be.

## **Disability**

### **Direct Discrimination**

We do not consider the proposed approach to MSL regulations and existing CMs to be directly discriminatory against those with disabilities, as the policy will apply across the fire workforce irrespective of disability.

### **Indirect Discrimination**

### **Workforce**

We do not consider that FRS staff with disabilities would face indirect discrimination as a result of the introduction of MSLs for FRSs. The fire and rescue workforce and pensions statistics covering the period from April 2022

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<sup>3</sup> [www.gov.uk/government/collections/fire-statistics?msckid=35550b23b5c911ecb24e3f128f482866#detailed-analysis-of-fires-attended-by-fire-and-rescue-services-in-england:-latest-version](https://www.gov.uk/government/collections/fire-statistics?msckid=35550b23b5c911ecb24e3f128f482866#detailed-analysis-of-fires-attended-by-fire-and-rescue-services-in-england:-latest-version)

to March 2023 (England only; published October 2023) show that, of the 33,702 individuals who have provided information on whether or not they have a disability (75.6% of FRS staff), 5.9% (1,972) were recorded as disabled. For Grey Book staff the percentage identifying as disabled was 4.9%. For Gold Book staff the percentage identifying as disabled was 3.2% and for support staff, who are most likely to be employed under the Green Book, 9.6% identified as disabled.<sup>4</sup>

As the percentage of fire staff identifying as disabled is low both overall and across all the books, we do not consider that the proposals would lead to indirect discrimination on the basis of a disability or failure to make reasonable adjustment. Disability should also not be a point of consideration in respect of which staff to include on work notices, as this will be considered on the basis of which employees are best placed to carry out the roles necessary to meet the MSL.

The statistics do not distinguish between physical and mental disabilities. However, there is likely to be a portion of the workforce with some form of mental health condition, who have learning disabilities and/or who are neurodiverse. For these staff members, the issuing of work notices at relatively short notice may be challenging.

Some FRS staff are also likely to be carers for disabled persons. For these members of staff, the potential for a work notice to be issued or amended very close to the strike day, particularly if they are not expecting to be rostered for duty or are required to work in a different location, could cause issues when finding alternative care arrangements. Although employers are likely to require flexibility when deciding which employees to include on a work notice where they may be required to work, they should give due consideration to caring responsibilities. If any disadvantage is suffered, we consider this would be justified on the basis that this approach is a proportionate way of protecting public safety during periods of strike action.

We do not consider that the varying degrees of access to the established CMs across FRS staff groups with different fire terms and conditions will lead to any indirect discrimination between staff with or without disabilities. All staff have access to all the CMs provided by the book they are employed under (Gold, Green or Grey), and staff under all three books have access to arbitration, the strongest existing CM, in national disputes. We have also recommended that employers offer the same CMs for local disputes as they would for those that are national. The introduction of MSLs will not affect the range of CMs to which staff employed under each book have access.

## **Public**

While the Government does not publish any statistics on victims of fire or at fire or rescue related incidents by disability status, both physical and some non-visible disabilities present an increased risk of death or severe injury in a

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<sup>4</sup> <https://www.gov.uk/government/statistics/fire-workforce-and-pension-statistics-year-ending-march-2023/fire-and-rescue-workforce-and-pensions-statistics-england-year-ending-march-2023>

fire or rescue incident. Research conducted by the Home Office reviewing fire related fatalities and severe casualties in England from 2010/11 to 2018/19 highlights the presence of impairments such as physical disability as a key risk factor.<sup>5</sup> Moreover, some physical disabilities may mean that an individual involved in a fire or rescue-related incident would require a greater degree of assistance from firefighters.

The introduction of MSLs could be positive in reducing the potential for indirect discrimination, as a greater level of firefighter availability than is currently the case during strike action would reduce the risk of people with this protected characteristic being more vulnerable in the event of a significant fire. Adopting an MSL of 73% will decrease this risk further as there will be more appliances available and a greater number of staff to respond to incidents. As with age, those most vulnerable would therefore benefit from a higher MSL: however, this will still need to be proportionate based on risk.

For a small percentage of disabled people who are cared for by people or relatives who work in the fire and rescue service, this policy could have a negative effect. For example, if the carer was included on a work notice and unable to find alternative caring arrangements, the disabled person may be more vulnerable.

## **Gender Reassignment**

The UK Government does not collect data on this characteristic within the fire and rescue service workforce. We do not consider that the proposed approach to MSL regulations would be likely to have a direct or indirect impact on people with this protected characteristic, either among the fire and rescue service workforce or the general public. This is the case across all three limbs of the PSED. We will update our equalities analysis should relevant data relating to the impact of this policy on individuals with this protected characteristic become available in future.

## **Marriage and Civil Partnership**

We do not consider that the proposed approach to MSL regulations and existing compensatory measures would be likely to have a direct or indirect impact on people with this protected characteristic, either among the fire and rescue service workforce or the general public.

## **Pregnancy and Maternity**

## **Direct Discrimination**

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<sup>5</sup> <https://www.gov.uk/government/publications/an-in-depth-review-of-fire-related-fatalities-and-severe-casualties-in-england-2010-to-201819/an-in-depth-review-of-fire-related-fatalities-and-severe-casualties-in-england-201011-to-201819>



The proposed approach to MSL regulations and existing compensatory measures will not be directly discriminatory against those who are pregnant or have recently given birth, as it will apply across the fire workforce irrespective of individuals' pregnancy or maternity status.

## **Indirect Discrimination**

### **Workforce**

We do not consider that this legislation or the existing CMs would be likely to indirectly discriminate against people with this protected characteristic. Of the parts of the FRS workforce most likely to be in scope for MSLs (namely, firefighters and control room staff), the proportion likely to hold this protected characteristic is very small. The fire and rescue workforce and pensions statistics covering the period from April 2022 to March 2023<sup>6</sup> (England only; published October 2023) show that, of the workforce in firefighting and control room roles, 89.0% (31,381 individuals) are men and 10.9% (3,856 individuals) are women. Of these female staff members, only a small proportion are likely to be pregnant or have recently given birth at any given time.

It is possible that the implementation of MSLs could impact a proportion of those with caring responsibilities for infants, particularly if employees are required to work on days where they may not normally be rostered for duties or if they are required to work in a different location. The work notices need to be issued with these responsibilities taken into account, and with fair warning to ensure alternative arrangements can be made.

Employers' decisions on which members of staff to include on a work notice will be considered on the basis of which employees are best placed to carry out the roles necessary to meet the MSL. These decisions should not be taken with protected characteristics in mind unless materially relevant.

We do not consider that the varying degrees of access to the established CMs across FRS staff groups with different terms and conditions will lead to any indirect discrimination between staff who have this protected characteristic and those who do not. All staff have access to all the CMs provided by the book they are employed under (Gold, Green or Grey), and staff under all three books have access to arbitration, the strongest existing CM, in national disputes. We have also recommended that employers offer the same CMs for local disputes as they would for those that are national. The introduction of MSLs will not affect the range of CMs to which staff employed under each book have access.

### **Public**

The Government does not publish any data setting out the proportion of the victims of fire, rescue-related incidents or non-fire-related incidents who were pregnant or had recently given birth at the time of the incident. However, as some people with this protected characteristic will have decreased mobility

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<sup>6</sup> [www.gov.uk/government/statistics/fire-workforce-and-pension-statistics-year-ending-march-2023/fire-and-rescue-workforce-and-pensions-statistics-england-year-ending-march-2023](https://www.gov.uk/government/statistics/fire-workforce-and-pension-statistics-year-ending-march-2023/fire-and-rescue-workforce-and-pensions-statistics-england-year-ending-march-2023)



which may increase the likelihood of being less able to speedily evacuate buildings, it would be reasonable to assume that MSLs, particularly as they are set at a high percentage level for firefighters, could have the effect of giving pregnant people and those who have recently given birth greater reassurance and ability to access fire and rescue services if needed during a period of strike action.

## **Race**

### **Direct Discrimination**

The proposed approach to MSL regulations and existing compensatory measures will not be directly discriminatory against any particular racial group, as it will apply across the fire workforce irrespective of race.

### **Indirect Discrimination**

#### **Workforce**

We do not consider that this legislation or the existing CMs would be likely to indirectly discriminate against FRS staff on the basis of race. Of the fire and rescue service staff in England for whom data on their ethnic background is available, 8.5% identify as being from an ethnic minority background. This overall figure equates to 8% of firefighters, 5.6% of control room staff and 10.9% of support staff.

We do not consider that the varying degrees of access to the established CMs across FRS staff groups with different terms and conditions will lead to any indirect discrimination between staff of different ethnic backgrounds. All staff have access to all the CMs provided by the book they are employed under (Gold, Green or Grey), and staff under all three books have access to arbitration, the strongest existing CM, in national disputes. We have also recommended that employers offer the same CMs for local disputes as they would for those that are national. The introduction of MSLs will not affect the range of CMs to which staff employed under each book have access.

Race should also not be a point of consideration in respect of the decision to include particular staff members on a work notice, since this will be considered on the basis of which employees are best placed to carry out the roles necessary to meet the MSL. If any disadvantage is suffered, we consider this would be justified on the basis that this approach is a proportionate way of protecting public safety during periods of strike action.

However, the Government considers that if any disadvantage occurs it is justified as a proportionate means of protecting public safety on strike days. Furthermore, the Government will consider extending the ability to make use of MSLs to Scottish and Welsh fire and rescue services through future regulations, based on modelling of relevant data.

## **Public**

We do not consider that this legislation is likely to have an impact on members of the public with this protected characteristic. A Home Office study of fire-related fatality and severe causality data from year ending March 2011 to 2019 found that overall, the ethnicity of fatal and severe casualty victims appeared to match that of the 2016 estimated proportion in the general population.<sup>7</sup>

## **Religion or Belief**

### **Direct Discrimination**

We do not consider that MSLs would be likely to have an impact on people with this protected characteristic, either among the fire and rescue service workforce or the general public. This is the case across all three limbs of the PSED.

### **Indirect Discrimination**

We do not consider that MSLs would discriminate against those with this protected characteristic. In response to the MSL consultation, three responses suggested that when operationalising MSLs, employers could mitigate any negative impacts on members of the workforce who practise a religion by giving consideration to any staff who had booked leave for religious celebrations and festivals when issuing work notices in order to ensure that staff retain the ability to take time off for religious purposes.

## **Sex**

### **Direct Discrimination**

The proposed approach to MSL regulations and existing compensatory measures will not be directly discriminatory on grounds of sex, as it will apply across the fire workforce irrespective of this.

### **Indirect Discrimination**

#### **Workforce**

The fire and rescue workforce and pensions statistics covering sex for the period from April 2022 to March 2023<sup>8</sup> (England only; published October 2023) show that of the 43,785 staff employed by fire and rescue authorities across all functions and whose sex was recorded, 80.5% (35,254 individuals) were men. This proportion varies according to function, with men comprising 91.2% of firefighters, 23.9% of control room staff and 45.4% of support staff. As the proposed MSL would be most likely to impact firefighters and control

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<sup>7</sup> [www.gov.uk/government/publications/an-in-depth-review-of-fire-related-fatalities-and-severe-casualties-in-england-2010-to-201819](http://www.gov.uk/government/publications/an-in-depth-review-of-fire-related-fatalities-and-severe-casualties-in-england-2010-to-201819)

<sup>8</sup> [www.gov.uk/government/statistics/fire-workforce-and-pension-statistics-year-ending-march-2023/fire-and-rescue-workforce-and-pensions-statistics-england-year-ending-march-2023](http://www.gov.uk/government/statistics/fire-workforce-and-pension-statistics-year-ending-march-2023/fire-and-rescue-workforce-and-pensions-statistics-england-year-ending-march-2023)

room staff, the employees to whom the measures would apply are more likely to be men overall.

However, we do not consider that the introduction of MSLs and the existing CMs would be likely to put staff who are men at a particular disadvantage compared with staff who are women and who are also subject to MSLs. If any disadvantage is suffered, we consider that this would be justified on the basis that the proposed MSLs are a proportionate means of achieving a legitimate aim because the measure is necessary to protect public safety.

We do not consider that the varying degrees of access to the established CMs across FRS staff groups with different terms and conditions will lead to any indirect discrimination between staff of different sexes. All staff have access to all the CMs provided by the book they are employed under (Gold, Green or Grey), and staff under all three books have access to arbitration, the strongest existing CM, in national disputes. We have also recommended that employers offer the same CMs for local disputes as they would for those that are national. The introduction of MSLs will not affect the range of CMs to which staff employed under each book have access.

From a control room perspective, the decision to introduce an approach in which FRSs are responsible for determining the number of staff to be included on any work notice may have a disproportionate impact on women if an FRS decides to include a large proportion of its control room staff, as women make up 76.1% of this workforce in England.<sup>9</sup>

Census data from 2021<sup>10</sup> shows that in both England and Wales, women were more likely to be providing unpaid care than men. Therefore, a small proportion of female FRS staff members will have caring responsibilities, for either children or disabled relatives for example. Staff members who are carers could face a disadvantage if work notices are issued or amended very close to a strike day and they are unable to find alternative caring arrangements. FRSs should give due regard to caring responsibilities when deciding which members of staff to include on work notices.

However, we consider that any indirectly discriminatory impact is justified on the basis that MSLs are necessary for the protection of the safety of the public and the policy is therefore a proportionate means to achieve a legitimate aim.

## **Public**

We do not consider that the introduction of MSLs for FRSs will cause any unlawful discrimination against members of the public of either sex. Evidence indicates that men are more likely than women to be involved in incidents that require the fire and rescue service to attend: in the year ending March 2023, men comprised 64% of all fire-related fatalities and 60% of non-fatal

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<sup>9</sup> [www.gov.uk/government/statistics/fire-workforce-and-pension-statistics-year-ending-march-2023/fire-and-rescue-workforce-and-pensions-statistics-england-year-ending-march-2023](https://www.gov.uk/government/statistics/fire-workforce-and-pension-statistics-year-ending-march-2023/fire-and-rescue-workforce-and-pensions-statistics-england-year-ending-march-2023)

<sup>10</sup> [www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/articles/unpaidcarebyagesexanddeprivationenglandandwales/census2021](https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/articles/unpaidcarebyagesexanddeprivationenglandandwales/census2021)

casualties in fires.<sup>11</sup> Given that MSLs are designed to ensure a minimum level of service during strike action to keep the public safe, we consider that this will be of public benefit to both sexes.

## **Sexual Orientation**

Direct and Indirect Discrimination – we do not consider that MSLs would be likely to have an impact on people with this protected characteristic, either among the fire and rescue service workforce or the general public. This is the case across all three limbs of the PSED.

**3b. Consideration of limb 2: Advance equality of opportunity** between people who share a protected characteristic and people who do not share it.

## **Age**

### **Workforce**

As almost two thirds (65.4%) of Grey Book firefighters and control room staff were aged between 16 and 45, staff in this age group are more likely to be included on a work notice.<sup>12</sup> However, the impact of MSLs is to require certain employees, with the necessary skills, to work on strike days. This does not, by itself, have a negative impact on the ability to advance equality of opportunity across different age groups, particularly given that the cohort for firefighters, for example, are broadly made up from the same age group.

We do not consider that the varying degrees of access to the established CMs across those with different fire terms and conditions will have any impact on the advancement of equality of opportunity among different age groups. Whilst Green Book staff have no recourse to conciliation as a CM (unlike the other two staff groups), many fewer staff in this group would be subject to a work notice. Additionally, Green Book staff do still have recourse to arbitration where conciliation is usually attempted by dispute resolution services such as ACAS in the first instance.

If the introduction of MSLs did in some way reduce equality of opportunity for older and younger FRS staff, we would consider this to be justified on the grounds that the MSL approach is a proportionate means of protecting public safety.

## **Public**

From a public perspective, FRS MSLs are also likely to help minimise the disadvantages that older people may face if FRSs were not so readily available during periods of strike action.

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<sup>11</sup> [www.gov.uk/government/collections/fire-statistics?msclkid=35550b23b5c911ecb24e3f128f482866#detailed-analysis-of-fires-attended-by-fire-and-rescue-services-in-england:-latest-version](https://www.gov.uk/government/collections/fire-statistics?msclkid=35550b23b5c911ecb24e3f128f482866#detailed-analysis-of-fires-attended-by-fire-and-rescue-services-in-england:-latest-version)

<sup>12</sup> [www.gov.uk/government/statistics/fire-workforce-and-pension-statistics-year-ending-march-2023/fire-and-rescue-workforce-and-pensions-statistics-england-year-ending-march-2023](https://www.gov.uk/government/statistics/fire-workforce-and-pension-statistics-year-ending-march-2023/fire-and-rescue-workforce-and-pensions-statistics-england-year-ending-march-2023)

However, as older people are more likely to be more severely affected by fires, it is arguable that the introduction of MSLs for FRSs could help put older people at lower risk as a result of increasing the number of FRS staff available on strike days. The 73% MSL level for firefighters was agreed upon partially due to the positive impact on the older population as they will be at less risk.

## **Disability**

### **Workforce**

The fire and rescue workforce and pensions statistics covering the period from April 2022 to March 2023<sup>14</sup> (England only; published October 2023) show that, of the 33,702 individuals who have provided information on whether or not they have a disability (75.6% of FRS staff), 5.9% (1,972) were recorded as disabled. These statistics show that the proportion of staff in roles that are most likely to be in scope of the MSL proposals and who are recorded as having a disability is low. We therefore do not consider that this legislation will have any negative effect on the advancement of equality of opportunity for people with disabilities. For those with this protected characteristic who are named in a work notice, the employer will need to justify why they are best placed to work to meet the minimum service level.

We do not consider that the varying degrees of access to the established CMs across those with different fire terms and conditions will have an impact on the advancement of equality of opportunity between those with a disability and those who are not disabled. Staff in roles that are most likely to be in scope of minimum service levels legislation (namely, firefighters and control room staff) are slightly less likely to have a disability than staff whose roles are unlikely to be covered by the legislation (such as support staff). In light of this, we do not consider that relying on existing CMs for the Grey, Green and Gold Books will have a discernible impact with regard to the advancement of equality of opportunity for those with the protected characteristic of disability.

### **Public**

While the Government does not publish any statistics on victims of fire or at fire-related incidents by disability status, physical disability is a known risk factor for an increased likelihood of being killed or severely injured in a fire. Moreover, some physical and mental disabilities may mean that an individual involved in a fire or rescue-related incident would require a greater degree of assistance from firefighters. We therefore consider that, while FRSs have business continuity plans in place for periods of strike action and no causal link can be made between previous industrial action and deaths or serious harm occurring, the introduction of MSLs could have the effect of giving people with disabilities greater reassurance that they will be able to access the fire and rescue service if needed, thereby advancing equality of opportunity for those with disabilities.

## **Gender Reassignment**

The UK Government does not collect data on this characteristic within the fire and rescue service workforce. We do not consider that MSLs will be likely to have an impact on people with this protected characteristic, either among the fire and rescue service workforce or the general public. This is the case across all three limbs of the PSED. We will update our equalities analysis should relevant data relating to the impact of this policy on individuals with this protected characteristic become available in future.

## **Pregnancy and Maternity**

### **Workforce**

We do not consider that this legislation or the existing CMs would be likely to have an impact on equality of opportunity for those with this protected characteristic. Where these staff are named in a work notice, the employer will need to justify why they are best placed to work in order to meet the minimum service level. We do not consider that the varying degrees of access to the established CMs across those with different fire terms and conditions will have a discernible impact with regard to the advancement of equality of opportunity for those with this protected characteristic.

### **Public**

The Government does not publish any data setting out the proportion of the victims of fire, rescue-related incidents or non-fire-related incidents who were pregnant or had recently given birth at the time of the incident. However, some people with this protected characteristic will have decreased mobility, which may increase the likelihood of being less able to speedily evacuate high-rise buildings. It would therefore be reasonable to assume that MSLs could have the effect of giving people with this protected characteristic greater reassurance and ability to access fire and rescue services if needed during a period of strike action, thereby advancing equality of opportunity.

## **Race**

### **Workforce**

We do not consider that the introduction of MSLs for FRSs is likely to have a negative impact on the ability to advance equality of opportunity between staff of different races. The employer will need to justify why any staff named on a work notice are best placed to work in order to meet the minimum service level. We do not consider that the varying degrees of access to the established CMs across those with different fire terms and conditions will have a discernible impact with regard to the advancement of equality of opportunity for staff of different races.

### **Public**

We do not consider that the introduction of MSLs for FRSs is likely to have an impact on the ability to advance equality of opportunity between members of the public of different ethnicities.

## **Religion or Belief**

We do not consider that MSLs would be likely to have an impact on people with this protected characteristic, either among the fire and rescue service workforce or the general public. This is the case across all three limbs of the PSED.

## **Sex**

### **Workforce**

The fire and rescue workforce and pensions statistics covering sex for the period from April 2022 to March 2023<sup>13</sup> (England only; published October 2023) show that of the 43,785 staff employed by fire and rescue authorities across all functions and whose sex was recorded, 80.5% (35,254 individuals) were men. This proportion varied according to function, with men comprising 91.2% of firefighters, 23.9% of control room staff and 45.4% of support staff. These statistics indicate that the introduction of MSLs for FRSs would have a greater impact on FRS staff who are men, as they represent the greater percentage of firefighters (the largest part of FRS workforce). However, there is also an adverse effect on female staff, who are more likely to work in control rooms.

The adoption of an approach for the control room MSL where FRSs determine the number of staff required to ensure usual operations are maintained will mean potential variable impact on women, who make up approximately three quarters (76.1%) of the control room workforce in England.<sup>14</sup> It is likely that a majority of FRSs would set their control room MSL at a high level given business-as-usual staffing levels vary considerably across the country (including where control room services are shared by FRAs). If this is the case, control room staff, who are much more likely to be female, would be less able to take strike action than staff who are firefighters, who are more likely to be male. However, we consider that any detrimental impact on equality of opportunity across different groups of FRS staff would be justified on the basis that such an approach is necessary to protect public safety.

Another consideration for female members of the workforce, who predominantly work as control room staff, is the greater likelihood for them to

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<sup>13</sup> [www.gov.uk/government/statistics/fire-workforce-and-pension-statistics-year-ending-march-2023/fire-and-rescue-workforce-and-pensions-statistics-england-year-ending-march-2023](https://www.gov.uk/government/statistics/fire-workforce-and-pension-statistics-year-ending-march-2023/fire-and-rescue-workforce-and-pensions-statistics-england-year-ending-march-2023)

<sup>14</sup> [www.gov.uk/government/statistics/fire-workforce-and-pension-statistics-year-ending-march-2023/fire-and-rescue-workforce-and-pensions-statistics-england-year-ending-march-2023](https://www.gov.uk/government/statistics/fire-workforce-and-pension-statistics-year-ending-march-2023/fire-and-rescue-workforce-and-pensions-statistics-england-year-ending-march-2023)



be carers.<sup>15</sup> For those with caring responsibilities, MSL policy may have a negative impact due to the potential for work notices to be issued or amended at late notice, particularly on days where employees may not normally have expected to be rostered for duties, and therefore perhaps making it difficult for carers to make alternative arrangements.

We do not consider that the varying degrees of access to the established CMs across those with different fire terms and conditions will lead to any discernible impact with regards to the advancement of equality of opportunity between different sexes.

## **Public**

We do not consider that the introduction of MSLs for FRSs will cause any unlawful discrimination against members of the public of either sex. However, in the year ending March 2023, men comprised 64% of all fire-related fatalities and 60% of non-fatal casualties in fires<sup>16</sup>. While FRSs have business continuity plans in place for periods of strike action and no causal link can be made between previous industrial action and deaths or serious harm occurring, the introduction of MSLs could have the effect of giving men the ability to draw on the fire and rescue service during a period of industrial action if the need arises.

## **Sexual Orientation**

We do not consider that MSLs would be likely to have an impact on people with this protected characteristic, either among the fire and rescue service workforce or the general public. This is the case across all three limbs of the PSED.

**3c. Consideration of limb 3: Foster good relations** between people who share a protected characteristic and persons who do not share it.

## **Age**

### **Workforce**

We do not consider that FRS MSLs are likely to damage relations between FRS employees in older and younger age groups. While younger staff are more likely to be working in front-line roles to which an MSL would apply, as almost two thirds (65.4%) of firefighters and control room staff were aged

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<sup>15</sup> [www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/articles/unpaidcarebyagesexanddeprivationenglandandwales/census2021](https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/articles/unpaidcarebyagesexanddeprivationenglandandwales/census2021)

<sup>16</sup> [www.gov.uk/government/collections/fire-statistics?msclkid=35550b23b5c911ecb24e3f128f482866#detailed-analysis-of-fires-attended-by-fire-and-rescue-services-in-england:-latest-version](https://www.gov.uk/government/collections/fire-statistics?msclkid=35550b23b5c911ecb24e3f128f482866#detailed-analysis-of-fires-attended-by-fire-and-rescue-services-in-england:-latest-version)

between 16 and 45.<sup>17</sup> we do not anticipate that this would lead to a decline in relations between older and younger staff.

Setting the MSL at a high level might be perceived to be disproportionate by some younger employees: this could result in poorer relations between such employees and employers. In these circumstances, a mitigating factor could be the required consultation between employers and unions, as well as public messaging and guidance on how to issue work notices.

We do not consider that the varying degrees of access to the established CMs across FRS staff groups with different terms and conditions will lead to any resentment between staff of different ages. Staff of all ages have access to the CMs provided by the book they are employed under (Gold, Green or Grey), and all three groups of staff have access to arbitration, the strongest existing CM, in national disputes. We have also recommended that employers offer the same CMs for local disputes as they would for those that are national. The introduction of MSLs will not affect the range of CMs to which staff employed under each book have access.

In the event that the introduction of MSLs were to lead to a deterioration in relations between FRS employees in older and younger age groups, we consider that this would be justified on the basis that the introduction of MSLs for these roles is necessary in order to strike the right balance between protecting public safety and not overly restricting the right to strike for employees who are not in front line roles.

## **Public**

Section 149(5) of the Equality Act 2010 notes that consideration of this limb of the PSED should focus in particular on the need to tackle prejudice and promote understanding. We do not consider that the introduction of MSLs for FRSs will have an impact in either of these areas. The positive impact on older members of the population could lead to an improvement in relations between them and younger members of staff if they feel particularly well protected by this policy. As older people are more likely to be more severely affected by fires, it is arguable that the introduction of MSLs for FRSs could help put older people at lower risk as a result of increasing the number of FRS staff available on strike days.

## **Disability**

## **Workforce**

We do not consider that this legislation is likely to damage relations between those who have this protected characteristic and those who do not. In the event that this were to occur, we consider that it could be justified on the basis that the policy design of MSLs for FRS roles is necessary in order to strike the right balance between protecting public safety and not overly restricting the

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<sup>17</sup> [www.gov.uk/government/statistics/fire-workforce-and-pension-statistics-year-ending-march-2023/fire-and-rescue-workforce-and-pensions-statistics-england-year-ending-march-2023](https://www.gov.uk/government/statistics/fire-workforce-and-pension-statistics-year-ending-march-2023/fire-and-rescue-workforce-and-pensions-statistics-england-year-ending-march-2023)

right to strike for employees who are not in front line roles. Furthermore, it is for the employer to justify why those members of staff included on work notices are best placed to work to meet the MSL. In circumstances where relations between staff with and without this protected characteristic could be damaged, a mitigating factor could be the required consultation between employers and unions, as well as public messaging and guidance on how to issue work notices.

We do not consider that the varying degrees of access to the established CMs across FRS staff groups with different terms and conditions will lead to any resentment between staff with and without disabilities. All staff have access to all the CMs provided by the book they are employed under (Gold, Green or Grey), and staff under all three books have access to arbitration, the strongest existing CM, in national disputes. We have also recommended that employers offer the same CMs for local disputes as they would for those that are national. The introduction of MSLs will not affect the range of CMs to which staff employed under each book have access.

## **Public**

Section 149(5) of the Equality Act 2010 notes that consideration of this limb of the PSED should focus in particular on the need to tackle prejudice and promote understanding. We do not consider that the introduction of MSLs for FRSs will have an impact in either of these areas. However, we consider that MSLs could have the positive impact of giving people with disabilities reassurance that they will be able to call on FRSs when required. We therefore consider that having MSLs in place during periods of strike action is likely to foster good relations between the members of the public with disabilities (especially those who need to call on the fire and rescue service during periods of strike action) and fire and rescue service staff (the majority of whom do not have a disability).

## **Gender Reassignment**

The UK Government does not collect data on this characteristic within the fire and rescue service workforce. We do not consider that MSLs will be likely to have an impact on people with this protected characteristic, either among the fire and rescue service workforce or the general public. This is the case across all three limbs of the PSED. We will update our equalities analysis should relevant data relating to the impact of this policy on individuals with this protected characteristic become available in future.

## **Pregnancy and Maternity**

### **Workforce**

We do not consider that this legislation is likely to have an impact on relations between FRS employees who have this protected characteristic and those to whom it does not apply. In the event that this were to occur, we consider that

it could be justified on the basis that the policy design of MSLs for FRS roles is necessary in order to strike the right balance between protecting public safety and not overly restricting the right to strike for employees who are not in front line roles. Furthermore, it is for the employer to justify why those members of staff included on work notices are best placed to work to meet the MSL. In circumstances where relations between staff with and without this protected characteristic could be damaged, a mitigating factor could be the required consultation between employers and unions, as well as public messaging and guidance on how to issue work notices.

We do not consider that the varying degrees of access to the established CMs across FRS staff groups with different terms and conditions will lead to any damage to relations between staff who have this protected characteristic and those who do not. All staff have access to all the CMs provided by the book they are employed under (Gold, Green or Grey), and staff under all three books have access to arbitration, the strongest existing CM, in national disputes. We have also recommended that employers offer the same CMs for local disputes as they would for those that are national. The introduction of MSLs will not affect the range of CMs to which staff employed under each book have access.

## **Public**

Section 149(5) of the Equality Act 2010 notes that consideration of this limb of the PSED should focus in particular on the need to tackle prejudice and promote understanding. We do not consider that the introduction of MSLs for FRSs will have an impact in either of these areas. However, we consider that having MSLs in place during periods of strike action could help foster good relations between front-line fire and rescue service staff (who are primarily male) and members of the public who are pregnant.

## **Race**

### **Workforce**

We do not consider that this legislation is likely to damage relations between staff of different races. In the event that this were to occur, we consider that it could be justified on the basis that the policy design of MSLs for FRS roles is necessary in order to strike the right balance between protecting public safety and not overly restricting the right to strike for employees who are not in front line roles. Furthermore, it is for the employer to justify why particular employees are best placed to work in order to meet the MSL. In these circumstances, a mitigating factor could be the required consultation between employers and unions, as well as public messaging and guidance on how to issue work notices.

We do not consider that the varying degrees of access to the established CMs across FRS staff groups with different fire terms and conditions will lead to any damage to relations between staff who have this protected characteristic

and those who do not. All staff have access to all the CMs provided by the book they are employed under (Gold, Green or Grey), and staff under all three books have access to arbitration, the strongest existing CM, in national disputes. We have also recommended that employers offer the same CMs for local disputes as they would for those that are national. The introduction of MSLs will not affect the range of CMs to which staff employed under each book have access.

### **Religion or Belief**

We do not consider that MSLs would be likely to have an impact on people with this protected characteristic, either among the fire and rescue service workforce or the general public. This is the case across all three limbs of the PSED.

### **Sex**

#### **Workforce**

We do not consider that this legislation is likely to damage relations between staff of different sexes. We anticipate that firefighters, who are more likely to be male, will form the majority of staff included on any work notice, but that the proportion of control room staff (who are primarily female) could be higher depending on the approach adopted by each individual FRS. In the event that the policy was to have any detrimental impact on relations between male and female staff, we consider that it could be justified on the basis that the introduction of MSLs for these roles is necessary in order to strike the right balance between protecting public safety and not overly restricting the right to strike for employees who are not in front line roles.

We do not consider that the varying degrees of access to the established CMs across FRS staff groups with different terms and conditions will lead to any damage of relations between staff of different sexes. All staff have access to all the CMs provided by the book they are employed under (Gold, Green or Grey), and staff under all three books have access to arbitration, the strongest existing CM, in national disputes. We have also recommended that employers offer the same CMs for local disputes as they would for those that are national. The introduction of MSLs will not affect the range of CMs to which staff employed under each book have access.

### **Sexual Orientation**

We do not consider that MSLs would be likely to have an impact on people with this protected characteristic, either among the fire and rescue service workforce or the general public. This is the case across all three limbs of the PSED.

#### 4. Summary of foreseeable impacts of policy proposal, guidance or operational activity on people who share protected characteristics

Protected Characteristic Group	Potential for Positive or Negative Impact?	Explanation	Action to address negative impact
<b>Age</b>	Likely overall positive impact.	<p>We have considered whether the introduction of MSLs for FRSs is likely to have a disproportionate impact on FRS staff aged 16-45 or affect their relations with other staff groups. This is because firefighters and control room staff tend to be younger than both support staff (who are less likely to receive work notices) and the wider working age population.</p> <p>However, we do not consider this to be a likely outcome as FRSs have to abide by the Equality Act 2010 when deciding which members of staff to include on work notices, and so this should not be determined with age in mind. We also consider that any negative impacts for younger people from the MSL would be counterbalanced by existing collective bargaining measures available to all fire and rescue service staff.</p> <p>Moreover, we consider that the policy will have a positive impact for members of the public. Evidence indicates that, in general, older people are more likely to need support from fire and rescue services. MSLs could have the effect of giving those groups who are more likely than average to call on the fire and rescue service greater reassurance and ability to access these services if needed during a period of strike action.</p>	No net negative impact
<b>Disability</b>	Likely overall positive impact	We do not consider that this policy will have a disproportionate impact on fire staff with this protected characteristic or on their relations with staff to whom it does not apply. This is because the percentage of fire staff with disabilities is low both overall and across all three sets of FRS terms and conditions. FRSs have to abide by the Equality Act when determining which members of staff to include on work notices and should not do this with protected characteristics in mind. As with age, any	No net negative impact

		<p>negative impacts of the MSL for FRS staff with disabilities would be counterbalanced by existing collective bargaining measures which apply to all fire staff.</p> <p>We do acknowledge that MSLs could have a negative impact on fire staff with mental health conditions, learning disabilities and/or neurodiversity. For these staff members, the potential issuing and amendment of work notices at relatively short notice may be challenging. This issue may also cause disruption for both fire staff with caring responsibilities and members of the public who care for fire staff.</p> <p>We consider that the MSL will have a positive impact on members of the public with disabilities as it could provide reassurance that they will have access to the fire and rescue service on strike days. Research conducted by the Home Office reviewing fire-related fatalities and severe casualties in England from 2010/11 to 2018/19 highlights physical disability as a key risk factor, and so people with disabilities may be more concerned than an average member of the public about lack of fire service provision. We consider that, overall, the positive impact of this policy in providing reassurance to people with disabilities across England outweighs the negative impacts on the small number of FRS staff with identified mental health conditions, FRS staff with caring responsibilities and members of the public who care for fire staff.</p>	
<b>Gender Reassignment</b>	No foreseeable impact	We do not consider that the proposed approach to MSL regulations or the existing compensatory measures would be likely to have an impact on people with this protected characteristic, either among the fire and rescue service workforce or the public.	None required.
<b>Marriage and Civil Partnership</b>	No foreseeable impact	We do not consider that the proposed approach to MSL regulations and existing compensatory measures would be likely to have an impact on people with this protected characteristic, either among the fire and rescue service workforce or the public.	None required



<b>Pregnancy and Maternity</b>	Likely overall positive impact	<p>In considering whether MSLs would have a disproportionate impact on FRS staff with this protected characteristic, we have identified the risk that the implementation of MSLs could impact a proportion of those with caring responsibilities for infants if they have returned from maternity leave before the infant is 26 weeks old and are called to work. The work notices need to be issued with fair warning to ensure alternative arrangements can be made. However, only 10.9% of staff in firefighting and control room roles are female and only a small proportion are likely to be pregnant or have recently given birth at any given time. Any negative effects of the MSL will also be counterbalanced by existing collective bargaining measures available to all fire staff.</p> <p>The policy will potentially have a positive impact on members of the public with this protected characteristic. Some people with this protected characteristic will have decreased mobility, which may increase the likelihood of being less able to speedily evacuate high-rise buildings. The MSL could have the effect of giving pregnant people greater reassurance and ability to access fire and rescue services if needed during a period of strike action. As the number of pregnant people who would reasonably be expected to benefit from this reassurance and enhanced strike day access to fire services is likely far greater than the number of FRS staff with this protected characteristic, we consider the net impact of the policy to be positive.</p>	No net negative impact.
<b>Race</b>	No foreseeable impact.	We have considered the risk that our proposals will have a discernible impact on staff with this protected characteristic but could not predict any reasonable disadvantage. Race should not be a point of consideration in respect of the decision to include particular staff members on a work notice.	No net negative impact

<b>Religion or Belief</b>	No foreseeable impact.	We do not consider that a fire MSL would be likely to have an impact on people with this protected characteristic, either among the fire and rescue service workforce or the public.	None required
<b>Sex</b>	Likely overall positive impact	<p>We have considered whether the MSL for firefighters is likely to have a negative impact on men as they comprise the majority of this staff group, and whether the MSL for control room staff will have a negative impact on female staff for the same reason. FRSs have to abide by the Equality Act when determining which members of staff to include on work notices and should not do this with protected characteristics in mind. If any disadvantage were to occur, we consider that it could be justified on the basis that the introduction of MSLs for these roles is necessary in order to strike the right balance between protecting public safety and not overly restricting the right to strike for employees who are not in front line roles.</p> <p>There will be some positive impacts for members of the public. Evidence indicates that men are more likely than women to be involved in incidents that require the fire and rescue service to attend, and the maintenance of a minimum service during strike action could provide reassurance to men that they will continue to have access the fire service on strike days. We consider that the number of members of the public who would potentially benefit from the reassurance provided by an MSL is significantly larger than the number of fire staff that would be impacted by it. Therefore, the net impact is likely to be positive.</p>	No net negative impact
<b>Sexual Orientation</b>	No foreseeable impact	We do not consider that MSLs or the existing compensatory measures would be likely to have an impact on people with this protected characteristic, either among the fire and rescue service workforce or the public.	

**5. In light of the overall policy objective, are there any ways to avoid or mitigate any of the negative impacts that you have identified above?**

**Workforce**

We consider that the MSL we have developed for FRS staff represents a deliverable, safe, and proportionate way of maintaining public safety on strike days while also maintaining the ability of FRS staff to take strike action.

It is important to note that we consider that the existing provisions within national collective bargaining framework provide a significant counterbalance to the reduction in the ability of firefighters and control room staff to take strike action. Current fire collective bargaining arrangements provide for mandatory arbitration, which would usually follow conciliation where either the employer or employee requests it. We consider this provides a practical compensatory measure and would strongly encourage employers to commit to the same measures for local disputes where the relevant unions request these.

**Public**

Overall, we consider the proposals likely to have a positive impact on members of the public with the protected characteristics of disability and pregnancy/maternity, as well as men and those in older age groups. No impacts on those with other protected characteristics have been drawn to our attention.

As a result, we consider the net impact of the policy to be positive.

**6. Review date:**

The Equalities Impact Assessment will be reviewed following a period of industrial action where work notices have been issued.

**7. Declaration**

I have read the available evidence and I am satisfied that this demonstrates compliance, where relevant, with Section 149 of the Equality Act and that due regard has been made to the need to: eliminate unlawful discrimination; advance equality of opportunity; and foster good relations.

**SCS sign off:** Zoe Wilkinson

**Name:** Zoe Wilkinson, Deputy Director Fire Safety Unit

**Directorate/Unit:** Fire Safety Unit

**Lead contact:** Kevin Finch (kevin.finch@homeoffice.gov.uk)

**Date:** 8 February 2024

For monitoring purposes all completed EIA documents and updated EIAs **must** be sent to the [PSED@homeoffice.gov.uk](mailto:PSED@homeoffice.gov.uk)

**Date sent to PSED Team: 8 February 2024**