



Fire and Rescue Service Equality and Diversity
Strategy: 2008-2018 Consultation
Summary of Responses



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1. Introduction

On 14th November 2007, the Government issued a consultation paper on a draft Equality and Diversity Strategy for the Fire and Rescue Service in England. The consultation paper set out the draft Strategy in full and asked respondents to comment on the proposals and in particular to respond to specific questions outlined in the consultation.

2. Background

In order to be effective in its role of reducing deaths, injuries and loss of property from the effects of fire and other risks the Fire and Rescue Service must engage with, and understand the needs of, the diverse communities it serves and plan and deliver its services to take account of those needs. Equality and diversity are therefore central to the effective protection of the public through fire prevention, protection and emergency response. Progress has been made in recent years, particularly on community engagement, but the workforce remains overwhelmingly white and male and equality and diversity have yet to be embedded in all areas of the work of the Service.

3. Strategy

The Equality and Diversity Strategy aims to deliver a step change, building on the Equality Standard for Local Government and the Core Values for the Fire and Rescue Service. Its vision is to create, by 2018, a Service which can demonstrate that it serves all communities equally to the highest standards, building on a closer and more effective relationship with the public and creating a more diverse workforce which better reflects the diversity of the local working population in each area. The Strategy requires action by Fire and Rescue Authorities, supported by Communities and Local Government, the Local Government Association (LGA), the Chief Fire Officers' Association (CFOA) and other partners, including representative bodies and staff associations, in five priority areas: Leadership, and Promoting Inclusion Accountability, Effective Service Delivery and Community Engagement, Employment and Training, Evaluation and Sharing Good Practice.

4. Consultation

Respondents were invited to comment on the draft Equality and Diversity Strategy and in particular respond to the following questions:

Strategy

Q1. Do you consider that the Strategy sets out the actions which will together drive change? If not, why not? And what would you wish to change?

Targets and monitoring

Q2. Do you support the principle of recruitment, retention and progression targets and consider that they will drive improvement on workforce diversity? If not, why not? And what would you propose should be put in place?

Q3. What are your views on the level at which recruitment targets for women in operational roles and ethnic minority staff should be set (within the ranges proposed), in order to be challenging but achievable, and likely to motivate action?

Q4. Do you consider robust monitoring of all seven strands of diversity achievable, and likely to motivate action?

Guidance

Q5. Are there areas covered by the Strategy for which you consider specific guidance for the Fire and Rescue Service is required, (in addition to existing guidance developed for the Service or for the public sector in general)?

Q6. We would also welcome any comments that you may have on the accompanying Impact Assessment (i.e. is there anything specifically you want Communities and Local Government to collect additional information on eg costs/benefits?).

5. Outline

This report contains a breakdown of the numbers of responses received and provides a summary of the comments made. It does not attempt to give a full account of all of the suggestions or comments made. In addition, it should be noted that not all of the respondents commented on, or responded to, every question raised as part of the consultation exercise.

6. Respondents

A total of 58 responses were received from a range of public and private sector bodies and organisations (detailed at Appendix):

Fire and Rescue Authorities	39*
Other representative organisations	8
Public Sector Bodies	2
Others	6
Individuals	3

*out of a total of 46 Fire and Rescue Authorities in England

7. Summary of Responses

General

The overwhelming majority of respondents supported and welcomed the draft Equality and Diversity Strategy.

Examples of comments:

"The increased commitment by virtue of a national strategy is welcomed and supported. It is a positive step forward to see the inclusion of effective service delivery and community engagement as a priority".

(Lincolnshire County Council)

"The Strategy is a welcome initiative, adding focus for those individuals and services that have been striving to make improvements in the area of Equality and Diversity".

(Oxfordshire, FRS)

"Pleasingly this is one of the much better consultations that has reached a gender of late".

(a:gender)

Question 1

Do you consider that the Strategy sets out the actions which will together drive change? If not, why not? And what would you wish to change?

Sixty per cent of those who answered the question considered that the Strategy sets out the actions that will together drive change, 30 per cent thought the Strategy was at least partially successful in doing so:

"In considering the Strategy, we believe many of the actions will promote positive change".

(Cornwall FRS)

"The Strategy is very comprehensive in the action it requires in each of the five priority areas".

(Cheshire Fire Authority)

“It is encouraging that CLG are taking such a strong lead on this issue and reinforcing the view that more is needed to be done to implement change. Cleveland Fire Brigade has been particularly active in the area of E&D as an individual FRS and within a regional collaboration, and welcomes the fact that such activity and identified improvements/outcomes in both service delivery and employment may be recognised through national monitoring”.

(Cleveland Fire Authority)

“the strategy succeeds in identifying the major drivers for achieving improvement – leadership, accountability, targets for improvement – and sets clear priorities for action by Fire and Rescue Authorities (FRA’s). We are especially supportive of the emphasis on leadership as without this it is unlikely that progress in other areas will be made”.

(The Chief Fire Officers Association (C.F.O.A))

“this strategy has set out actions which if acted upon can, with commitment, above all from Chief Fire Officers and FRA’s, drive much needed change of the culture and diversity in the FRS in England. . . .we are however concerned that whilst strict monitoring is proposed along with review process’, there is a distinct lack of sanctions for CFO’s.

(Fire Brigades’ Union (FBU))

10 per cent of respondents did not consider that the Strategy would drive change as required. Comments from those who thought the Strategy failed in setting out actions included:

“the strategy misinterprets Equalities legislation”

(Merseyside FRS)

“E&D strategies should be developed locally”

(Essex FRS)

“NFRS feels that a 10 year strategy, during such an intense period of change at Fire and Rescue Authorities, will mean that the strategy and its aims will soon become outdated and targets unachievable. NFRS feels that this strategy should match the timescale of the National Framework which is 3 years”.

(Nottingham Fire and Rescue Service)

Response

The overwhelming endorsement of the Strategy is very welcome.

The drivers for change identified both in the Strategy and in the Fire and Rescue Service National Framework 2008-11 include both support and recognition of progress and sanctions if improvement is not achieved. The Strategy sets out the role of the Audit Commission in assessing progress, and of the Equality and Human Rights Commission in providing both advice and challenge. It also sets out measures for identifying and highlighting where there is inaction and lack of improvement and acknowledging and rewarding progress; the publication of the annual Equality and Diversity Report by CLG, the development of national mechanisms for sharing good practice, and the annual national equality and diversity awards will all play a key role in this process.

The issues regarding equalities legislation have been reviewed and some minor amendments have been made to ensure the references to legislative requirements and sanctions within the Strategy are clear and accurate.

The intention of creating a national Strategy is to drive forward improvements on equality and diversity in the Fire and Rescue Service at national, regional and local levels and deliver lasting change. To make this effective it is important that Fire and Rescue Authorities (FRAs) develop their own local strategies and action plans to improve performance, supported and informed by the national Strategy.

FRAs will be aware that under current equalities legislation all services have a public duty to promote equality and are bound by law to produce Equality Schemes for Gender, Race and Disability. This will still be the case. Services are also currently working to the Equalities Standard for Local Government (ESLG). Performance against their statutory gender, race and disability schemes and evidence collected for ESLG purposes can be used by FRAs to provide evidence of improved performance on equality and diversity for the national Equality and Diversity Report. Further guidance on the information which will be required to be submitted for the report will be published during the Summer.

A 10 year Strategy was developed to provide a clear view of the long term goals, in recognition of the scale of change needed. The action planning process will help FRAs to focus on what they need to achieve in the shorter term to achieve the long term aim. It is for this reason that the workforce diversity targets have been set initially with a five year timeframe to drive immediate action and to identify, through the monitoring and reporting process, whether progress is being made.

Question 2

Do you support the principle of recruitment, retention and progression targets and consider that they will drive improvement on workforce diversity? If not, why not? And what would you propose should be put in place?

Just over a third of respondents answered this question. Of the third, 84 per cent supported the principle of recruitment, retention and progression targets and considered that they would drive improvement on workforce diversity, 9 per cent did not and 7 per cent failed to specifically answer the question.

“The principle of these targets is fully supported. These targets act as one of the main drivers for change within the Fire and Rescue Service and as such they are essential. It is however important that these targets are not seen as the sole focus of the E & D agenda. The Equality Standard for Local Government acts as a vehicle to mainstream equality into our organisation and it is important that these other and wider measures of equality are also fully utilised”.

(West Yorkshire Fire and Rescue Service)

“The Service supports the principle of targets which need to be stretching, realistic, and based on local demographics and the proportion of the workforce which is retained”.

(Cumbria Fire and Rescue Service)

“The Authority supports the principle of recruitment, retention and progression targets and would add attraction. We believe that the collection, measurement and analysis of the data collected can be contributing variables towards improving workforce diversity. However, it must be noted that there are contributing factors such as history, culture and reputation, in particular the experience of minority groups who have been employed by the organisation, are significant factors”.

(London Fire and Emergency Planning Authority (LFEPA))

Despite the majority of respondents supporting the principle, some felt that targets alone would not drive change and some voiced disappointment that the targets appeared to focus only on employment areas. Some respondents also made the point that targets can be either motivational or de-motivational.

“we ... believe it is necessary for the Equality and Diversity Strategy to fully explain the ‘big picture’ or national vision that it will assist to achieve. Unfortunately, upon reading the Strategy the reader may be forgiven for thinking that equality and diversity is simply about recruitment and retention targets”.

(Dorset Fire Authority)

“Whilst it is content with the overall thrust in respect of the proposed actions, the Authority would welcome a broadening of the focus of the Strategy, to incorporate aspects of service delivery performance in addition to a sole focus on workforce diversity”.

(Lancashire Combined Fire Authority)

“Vast majority of planned measurements appear to be focused in employment related statistics helpful to widen to other priority areas”

(Warwickshire FRS)

“Retaining staff from under-represented groups and supporting them through development and promotion is key to an overall diversity in employment approach”.

(South Yorkshire FRS)

Response

We are pleased to note that the majority of those who answered this question supported the principle of recruitment, retention and progression targets and consider that these will drive improvement on workforce diversity. The strong focus we place on workforce targets in the Strategy is supported by particular concerns regarding the low representation of women in operational roles and minority ethnic staff across the Service, currently 3.1 and 3.2 per cent respectively.

We agree that targets alone will not drive change and see these as part of a wider programme of work. Indeed the targets are only one measure by which progress on equality and diversity will be assessed. Performance across other areas of employment and the wider corporate functions as well as crucially within service delivery, measured both qualitative and quantitatively, will be vital elements in the identification of progress, or lack of it. Information about activity in all these areas will, as with the ESLG, form part of the evidence required for publication in the annual Equality and Diversity Report.

Question 3

What are your views on the level at which recruitment targets for women in operational roles and ethnic minority staff should be set (within the ranges proposed), in order to be challenging but achievable, and likely to motivate action?

Women

Comments were sought on the appropriate level within the range of 12 per cent up to 18 per cent of recruits by 2013 for women (operational roles). The consultation paper offered the following three options:

Option 1 – 12 per cent of recruits by 2013

Option 2 – 15 per cent of recruits by 2013

Option 3 – 18 per cent of recruits by 2013

Of those respondents who answered the question a clear majority (58%), including the LGA, preferred setting the target at the lower end of the proposed range ie 12 per cent. A third, including CFOA felt 15 per cent would be achievable. Only one FRS and the FBU supported a target of 18 per cent. One non fire and rescue service /external respondent recommended a percentage higher than those proposed.

“Recruitment for women should be put at 12% or towards the lower end of the band. Many FRS are still having difficulty increasing the numbers of applicants from women, even though positive action is being undertaken”.

(Warwickshire FRS)

“The Authority would recommend that the targets for the recruitment of operational women should be 12% rising to 15% by 2013. This would be a challenging but achievable target within the timescale”.

(LFEPa)

“We would broadly support a target for the recruitment of women at the mid point of the range proposed i.e. 15%.”

(CFOA)

“The difference between 12 per cent and 18 per cent in real recruitment terms for a Service of this size, is the difference between 1 and 2 women per recruitment drive so does not make much difference. The higher level should be supported because it will not be much of a stretch and would be a good step towards achieving a workforce which represents the much more demanding general societal gender profile”.

(West Sussex FRS)

Response

Careful consideration has been given to the appropriate level at which to set this recruitment target. Taking into account the need to provide a challenging and aspirational target whilst ensuring it remains achievable, and in light of the range of comments received in response to the consultation, Ministers have agreed that the national target should be set at a minimum of 15 per cent by 2013 whilst encouraging FRAs to set their own more challenging targets for achievement.

Broadening the diversity targets for women

A number of respondents felt that the focus on operational roles could be misleading and divisive rather than supporting the creation of a unified culture. Some argued that the definition of operational staff should be widened to include community fire safety officers and control staff.

“The move from reactive to preventative work in the Service has meant that the role of firefighter is changing. We consider that the proposal for the gender target to cover only “operational roles” does not recognise this changing role”.

(Merseyside FRS)

“There is a continuing debate to be had about what precisely constitutes “operational roles” as FRSs continue to diversify structures and establishments; the definition of “front-line staff” is developing rapidly but we also acknowledge that the risk remains of effectively insulating the emergency response section of the service from increased diversity if this argument is pursued too far”.

(CFOA)

Response

It is recognised that there has been a broadening of the range of roles within the FRS which provide a service directly to the public, particularly in preventative fire safety and the arguments in favour of extending the target for recruitment of women to include these roles have been carefully considered. However, the continuing very low numbers of women in the firefighter role indicates that the focus needs to remain on this sector in particular, through the use of targets, to encourage and support improvement. The Strategy makes it clear that in addition to the workforce targets it is an expectation that FRAs will monitor across all sections of the organisation and provide evidence of increased numbers of women in other roles and in more senior positions.

Minority ethnic staff

Comments were sought on the appropriate target to be adopted for all Minority Ethnic staff out of the following options:

Option 1 – to reach the same percentage as in the local working population by 2013

Option 2 – to reach the percentage in the local working population plus up to 5 per cent as a percentage of recruits by 2013.

Comments were sought on whether the first or second option should be adopted, and if Option 2 was preferred, the appropriate level within this range.

Comments were also sought on the proposal within the Strategy regarding FRS's with very low minority ethnic working age populations (eg. below 2 per cent) and low recruitment requirements (eg less than 20 people a year) being able to set a target in terms of individuals recruited over the five year period rather than a percentage of total recruitment.

The overwhelming majority (94%) of those who commented supported Option 1 – a target in line with representation in the local working population, this included 44 per cent who supported flexibility to set that target in terms of the number of recruits rather than in percentage of total recruits.

Some FRAs with high numbers of Retained Duty System (RDS) staff also raised concern over the difficulty of setting a realistic target covering both urban and rural areas with very different levels of minority ethnic representation as well as the restricted recruitment area from which FRAs are able to select employees for the RDS, which is limited to living or working within four or five minutes of a station.

“BME target – Option 1. Anything else is not realistic or meaningful”.

(Hereford and Worcester FRS)

“NFRS supports Option 1. The Authority should be working towards reflecting the population it serves. We are unsure of the reasons for the ‘plus up to 5%’ aspect in Option 2 which seems to go beyond the requirement of the law and again would not be an achievable target”.

(Nottingham FRS)

“BSCF believes that the figure of 5% above the local minority share in the working population is appropriate”.

(British Sikh Consultative Forum)

“Those services with individuals conditioned to the retained duty system will require the ability to assess their profile in respect of ethnic minority staff by each individual station and therefore the proposal to consider the targets over a five year period where low minority populations and low recruitment needs is essential”.

(Lancashire Fire and Rescue Service)

“We also welcome the suggestion that, where minority ethnic populations are small, or where recruitment is very low or non-existent, a numerical target is helpful”.

(CFOA)

Response

Consideration has been given to what would be both a stretching and achievable recruitment target. Taking this consideration into account, and the views of respondents, Ministers have agreed that the recruitment target for minority ethnic staff should be as set out as in option 1 i.e. the recruitment target for Minority Ethnic staff (across the whole service) is to reach the same percentage as in the local working population by 2013 whilst encouraging FRAs to set their own more challenging targets for achievement. In addition there is a provision for flexibility to take account of the specific issues in relation to RDS Staff.

NOTE: The recruitment targets set out at paragraph 7.5 of the Strategy are the minimum required under the National Framework. To encourage Fire and Rescue Authorities to strive for more rapid improvement in the diversity of their workforce, Communities and Local Government will allocate an additional capital grant payment to those Fire and Rescue Authorities that commit to the achievement of higher recruitment targets. A minimum of £42,000 in capital grant will be allocated in 2009/10 or 2010/11 to those Fire and Rescue Authorities which make a commitment to achieving the following targets:

- By 2013 a minimum of 18 per cent of new entrants to the operational service to be women.
- By 2013 recruitment of minority ethnic staff across the whole organisation to be at 2 to 5 per cent above the minority ethnic representation in the local working population.

Details of how FRAs can apply for this additional grant and the method by which it will be allocated will be announced shortly.

Key issues for diversity employment targets

Definition of Minority Ethnic staff

Several respondents asked for further clarity within the Strategy on the definition of Minority Ethnic staff in order that there should be a clear understanding of which staff qualified to be counted within the statistics relating to minority ethnic staff. In particular this clarity was sought with regard to those members of staff who identified themselves as having White non-British ethnicity.

“Clarity on what is meant by Black Minority Ethnic should be considered as currently debate often occurs between who qualifies under the terminology of BME. For instance invisible ethnic minorities as is the case with Polish and White Irish. These groups are vulnerable to discrimination and vulnerable to fire risks due to other social and economic indicators”.

(Staffordshire FRS)

Response

It is clearly set out within the Strategy that Fire and Rescue Authorities have to ensure they promote equality across all strands of diversity whether in terms of service delivery, employment practices or in wider corporate responsibilities e.g. procurement. Text has been included within the Strategy clarifying that minority ethnic classification for the purposes of the Strategy (e.g. for workforce diversity targets) includes those who come under the heading of White – non-British (Other). This is particularly important, as highlighted by a number of respondents because of the increasing number of migrants to England from East European Accession (A8) countries a significant proportion of whom are choosing to settle within this country. In many instances these particular communities have specific language and cultural needs which differ from other established White groups within this country. It is therefore important that strong links are made with these communities as with other minority ethnic communities in order to deliver effective fire safety advice and to encourage balanced recruitment in reflection of the diversity of the local population which each Fire and Rescue Authority serves.

Attraction targets

A number of respondents suggested that the Strategy should include attraction rates for recruitment applications from women and minority ethnic candidates as a proportion of all applications.

“Outcomes should include as a measurement of success the number of applications (progressive increases) from women and people from BEM backgrounds. This in itself is a truer measurement within the context of irregular recruitment drives, the ratio of applications to jobs available, the national recruitment processes which allow potential applicants to apply to multiple FRS’s, the proportionate reality of applications from diverse applicants and the consistent work it takes to widen the applicant pool”.

(Avon FRS)

“Our preferred approach would be to aim for increasing numbers of women and BME applicants with each recruitment process, consistent with actual requirements, and in the case of BME applicants, the relevant local population”.

(Cambridgeshire FRS)

“Disappointed that the attraction targets have not been included as the London Fire Brigade (LFB) feels that information on those who apply for employment is a good measure of the impact the FRS is having in building links with communities, removing barriers of perception and raising the profile of the services within minority communities”.

(LFEP)

Response

Attraction targets have not previously been included in the targets proposals because of the disparity in the way FRAs collect this information. Not all FRAs process all the application forms received, some preferring to use a sift method which throws out a random selection of applications to reduce the burden of processing large numbers. To ensure that performance against a national attraction target could be monitored consistently across the country, FRAs would be required to analyse all application forms, to make this a requirement would require further consultation to be carried out on this specific issue. We do, however, consider that provided the method employed to record attraction rates by individual FRAs is consistent, this would provide a measure of local progress. We have therefore included in the Strategy the provision for FRAs to set voluntary attraction targets.

Question 4

Do you consider robust monitoring of all strands of diversity achievable and likely to motivate action?

Fifty-nine per cent of respondents answered this question. The majority of those who responded believed that robust monitoring of all strands of diversity was achievable. A number of those who considered robust monitoring achievable and likely to motivate action stated that guidance on this would be helpful.

Service delivery, religion and sexual orientation were highlighted as being more difficult to monitor with a number of respondents highlighting the need to recognise that staff/stakeholders may be unwilling to disclose information on diversity. In addition a number of respondents questioned the benefit of monitoring, expressing uncertainty about the benefits to be derived from the collection of this information.

“Robust monitoring is certainly achievable. The requirement to monitor and report on that exercise does motivate activity. However, a streamlined approach to reporting would be beneficial and the views of the EHRC and other regulating/auditing bodies would greatly assist accuracy, compliance and motivation”.

(CFOA Scotland)

“With regard to robust monitoring of all strands of diversity, it is the view of the Royal Berkshire Fire Authority that seeking to collect and monitor information on sexual orientation, which is a highly personal aspect of individual’s lives, is not relevant, appropriate or even practical and should not therefore be attempted”.

(Royal Berkshire FRS)

“As with the targets, monitoring is fine if there is a purpose to it. What will happen with all the information? Is there an expectation that there will be some ‘response’ to information gathered? If all strands are monitored do we have the skills, capacity and resources to respond to all of them at the same time?”

(West Midlands FRS)

Response

Whilst it is recognised that some staff and members of the public will continue to decline to complete diversity monitoring forms it is important (and in the case of race, gender and disability, a statutory requirement) to collect (and publish) this information. Without robust monitoring processes it is not possible for FRAs to gain a clear picture of whether and how their policies, practices and procedures are having a differential impact on people from differing sections of society or with differing needs or abilities both within the workforce and the community.

Guidance on good practice with regard to monitoring diversity is being developed to accompany the Strategy.

Question 5

Are there areas covered by the Strategy for which you consider specific guidance for the Fire and Rescue Service is required (in addition to existing guidance developed for the Service or for the public sector in general)?

Sixty-six per cent of respondents answered this question, 11 per cent of whom stated that there was no need for any additional guidance.

The following suggestions were given by respondents of the kind of guidance they would find helpful:

- Good practice sharing
- Positive Action
- Graduate Entry Scheme
- High Potential Development Scheme
- Monitoring.

Response

Guidance documentation is being developed to accompany the launch of the Strategy in the following areas:

- Data collection/monitoring
- Staff performance management

- Knowledge Bank – ie Information on the range of guidance / organisations able to help FRAs across the range of equality and diversity issues.

The Integrated Risk Management Plan guidance due to be published shortly will also include a chapter on Equality and Diversity. In addition there will be ongoing work to develop an appropriate suite of guidance to cover issues such as good practice sharing and positive action. Work on the development of the national Graduate Entry and High Potential Development Schemes will begin shortly and further information on the proposals for these schemes will be available later in the year.

Question 6

We would also welcome any comments that you may have on the accompanying Impact Assessment (ie is there anything specific you want Communities and Local Government to collect additional information on ie costs/benefits?)

This question generated few responses with only 34 per cent of respondents commenting on the Equality Impact Assessment, forty per cent of those felt that there would be costs in implementing the Strategy both in terms of direct financial resources and capacity. Thirty per cent felt it was adequate and thorough whilst the other 30 per cent ranged from highlighting the need to strengthen the business case to questioning whether in fact the National initiatives referred to are in fact National.

“Page 47 states that no additional costs are expected as a result of the Strategy. The Authority would question this, as several of the actions included in the Strategy, such as positive action or a thorough audit of the workforce, would be expected to have resource implications. The Strategy is designed to help the Service implement a change in culture and practice: it would be difficult to see how this could be done without additional resources to fund it”.

(Wiltshire FRS)

Response

Fire and Rescue Authorities have had statutory obligations, in some instances going back a number of years, not only to ensure equality with regard to the various strands of diversity (race, gender and gender identity, disability, religion/belief, sexual orientation and age), but also, more recently, to promote equality with regard to race, gender and disability. In 2000 and 2001 two Equality and Diversity Action Plans (Toward Diversity 1 & 2) were published and distributed to all Fire and Rescue Services providing clear guidance on measures which would support them in meeting their statutory obligations, promoting good practice and achieving progress. Fire and Rescue Services have, therefore, known for a number of years not only what their statutory obligations are but also the variety of tools available to achieve improvements including the use of positive action and awareness-raising. One of the key aims of the Strategy is to refocus Authorities on their statutory obligations and to reinforce

the importance of leadership and commitment in achieving real, tangible improvements in performance.

In responding to the six key questions respondents identified the following issues which they considered needed to be specifically addressed within the Strategy:

The business case for diversity

A number of respondents suggested that the business case for diversity outlined in the Strategy could be strengthened and given greater weight and prominence in the text to emphasise and explain the need for diversity eg:

“Some services have made progress on this by shifting the focus of debate away from workforce targets and towards what some have described as the “business case” argument whereby we can make it clear to staff that there are sound operational reasons for having a more diverse and representative workforce. This is more about developing “cultural competence” than merely seeking cultural awareness and compliance. Mainstreaming diversity into everything we do – from management meetings to operational debriefs – cements in people’s minds the benefits and advantages that accrue from a wider and deeper understanding of difference and need. It will also lead to innovation in service delivery and overall improvement in standards. In general, we feel that more emphasis could be given to these points in terms of driving FRAs to better results”.

(Chief Fire Officers Association)

“valuing and promoting equality and diversity are central to the effectiveness of the Fire and Rescue Service in England. For the Strategy to be able to drive change there needs to be sufficient flexibility to allow Fire and Rescue Authorities (FRAs) to develop diversity initiatives that would meet the needs of their communities and individual circumstances.there is a need to frame the issues in terms of the business benefits that a more diverse workforce would bring for FRAs. Change will not be achieved simply through target setting”.

(Local Government Association)

Response

It is agreed that it is important that the business case for diversity, which is key to delivering improvements on workforce diversity, is clearly understood. We have therefore reviewed the text of the Strategy to ensure there is a clear focus on the business reasons for diversity throughout the Strategy.

Service delivery

Service delivery was highlighted by a number of respondents as being an area that could be strengthened within the Strategy, again by emphasising the business case and benefits of more effective engagement across all parts of the community eg:

“the strategy currently places too much importance on workforce”

(East Sussex FRS)

Response

Equality of outcome for all parts of the community in service delivery, including the provision of appropriate, effective fire safety initiatives, is the central aim of the Strategy. From comments received it is clear that the wording within the Strategy would benefit from strengthening. The text of the Strategy has been amended in a number of areas to emphasise this key aim.

Inclusion of all staff groups

It was proposed that greater clarity was needed regarding the inclusion of all staff groups in the Strategy, including a clear reference to the need to comply with the requirements of the equal pay legislation eg:

“The omission of the Equal Pay Act 1970 and Sex Discrimination Act 1975 from the draft Equality and Diversity Strategy is a serious oversight. This must be rectified to give the strategy proper coverage and credibility”.

(UNISON)

Response

Omission of these two Acts from the appendix to the draft Strategy was an oversight which has been rectified. Reference to the Equal Pay Act has also now been included within the main text of the Strategy.

Priority areas

Although the consultation document did not specifically ask for views on the priority areas a number of respondents did comment on them. We have, therefore, included this additional section providing a summary of comments around the priority areas.

The Equality and Diversity Strategy outlined five priority areas:

- Leadership and Promoting Inclusion
- Accountability
- Effective Service Delivery and Community Engagement
- Employment and Training
- Evaluation and Sharing Good Practice.

There was general support for the five priority areas identified particularly because of their correlation with the Equality Standard for Local Government which FRA's are already working to achieve:

"We agree with the five priority areas as set out which mirror the Local Government Equality Standards and support "Leadership and Promoting Inclusion" as priority one. Without this, all other priorities will not be achieved".

(Cheshire Fire Authority)

Priority 1: Leadership and promoting inclusion

A number of respondents welcomed the focus on leadership and promoting inclusion and believed that without the emphasis on this as a priority in the Strategy it was unlikely that there would be progress on the other priorities listed.

Examples of comments made by respondents:

"Equalities agenda driven by most senior personnel is vital in increasing the momentum for progression. Pleasing that strategy recognises that all have a role in ensuring E&D is genuinely mainstreamed and that this is to be accomplished through strategic direction and leadership".

(Chief Fire Officers Association, Scotland)

"Thought should be given to FRA's being required to nominate a lead member to work with officers in implementing the Strategy. Without elected members approaching the modernisation of the FRS robustly even in the face of opposition, especially from the representative bodies, service culture is unlikely to change sufficiently to support a truly diverse workforce. We do not believe that the provisions as drafted are sufficient for members to undertake their role in "leadership and promoting inclusion".

(Cheshire Fire and Rescue Service)

Response

The Strategy sets out clearly the responsibilities for all at national, Authority and individual levels. We are committed to monitoring and reviewing progress in the annual national Equality and Diversity report and have agreed to work with the LGA and CFOA to identify and support a national champion for Equality and Diversity. We will also be ensuring that leadership training is developed and implemented for Senior Fire and Rescue Service employees and members of Fire and Rescue Authorities as well as undertaking provision of national guidance.

Priority 2: Accountability

Those who made comments on accountability in the main supported its emphasis as one of the five priority areas and welcomed the involvement of the Audit Commission.

Examples of comments made by respondents:

“Recognise that leadership and accountability will make greatest impact on services ability to implement change.

(Chief Fire Officers Association, Scotland)

“Concerned that service leaders have failed to meet past targets and will be allowed to carry on underperforming in this key area unless clear rewards and sanctions are applied”.

(Asian Fire Service Association)

“Welcome emphasis on accountability”

(Chief Fire Officers Association)

Response

We believe that the assessment of the performance of all Fire and Rescue Authorities against the requirements of the National Framework by the Audit Commission along with the annual review and publication of progress made by them in the annual Equality and Diversity Report will encourage Authority Members and Chief Fire Officers to commit to driving this agenda forward providing the impetus and drive to make effective change. In addition the Equality and Human Rights Commission will provide both advice and challenge to Authorities to help to ensure they meet their obligations arising from the full range of equalities legislation.

Priority 3: Effective Service Delivery and Community Engagement

Comments around Effective Service Delivery and Community Engagement highlighted the need to give sufficient weight to service delivery in line with that given to employment and recruitment issues. Strengthening of the business case was also highlighted.

Examples of comments made by respondents:

“Mainstreaming diversity into everything we do will lead to innovation in service delivery and overall improvement in standards”.

(Kent FRS)

“The Authority would welcome a broadening of the focus of the strategy, to incorporate aspects of service delivery performance in addition to a sole focus on workforce diversity”.

(Lancashire Combined Fire Authority)

“Whilst the Strategy identifies 5 priority areas, the specific measurable targets are confined to employment which gives the impression that the main Equality & Diversity issue to be addressed relates to the composition of the workforce. In reality, effective service delivery and community engagement are also critical to success as reflected in the Equality Standard for Local Government”.

(Cumbria FRS)

“The Strategy would also benefit from having a bit more on engaging with communities and how working with the community will enhance current work but will also lead to a more reflective and appropriately responsive service”.

(West Midlands FRS)

Response

As stated previously equality in Service Delivery is a key component of the Strategy and in response to comments received the text has been strengthened to ensure this is clear.

Priority 4: Employment and Training

In terms of employment several respondents mentioned low staff turnover rates whilst others suggested that the Strategy should take account of future migration trends. Issues such as definition of operational roles, definition of Minority Ethnic staff and attraction targets were also raised (respondents comments on these issues can be found under question 3 on page 10). Comments were also made regarding the importance of training and staff appraisal.

Examples of comments made by respondents:

“We repeat again that training and development for members and senior leaders is absolutely fundamental to moving this issue forward and we are pleased to note that the strategy is recommending appraisals for Chief Fire Officers. However the LGA need to put in place systems for improving elected members understanding and application of equality and diversity principles”

(Networking Women in the Fire Service)

“The most effective way of getting senior managers to sign up to delivering on equality and diversity is to have it as an objective in their Professional Development Reviews. Some other services, such as the Police Service, have developed good practice in this area”.

(South Yorkshire FRS)

“To effect real change behavioural and cultural change is needed which can require considerable investment in training throughout and organisation”.

(Shropshire and Wrekin Fire Authority)

“There is a need for action at national level to promote careers in the operational Fire and Rescue Service for women. This needs to be targeted at girls and young women and those who advise and influence their career choices. The scale of change in perceptions required is beyond the compass of individual Fire and Rescue Authorities or even Regional Management Boards”.

(Royal Berkshire FRS)

Response

The new workforce diversity targets focus on retention, progression and recruitment rather than workforce composition; consequently those FRAs who have low turnover rates will be able to demonstrate the efforts they are making to improve diversity through the improvement in the diversity of their newly appointed staff.

The Strategy has identified the need for equality and diversity objectives for all members of staff from Chief Fire Officer to newest entrant in order to ensure this is central to the way everyone carries out their role within the organisation. As mentioned above training for Authority members and senior staff is also considered key and there is commitment from CFOA, LGA and Communities and Local Government to this issue.

Awareness-raising at local and national levels among all under represented groups about the opportunity of a career in the Fire and Rescue Service is fundamental to the creation of a more representationally diverse workforce. Communities and Local Government is committed to supporting the Service in raising its profile as a career of choice. Communities and Local Government has followed up the major national campaign it undertook in 2006 to encourage women to consider a career as a firefighter by funding research into raising the profile of a career in firefighting with girls aged 14-16. Further work on this initiative will be developed in partnership with stakeholders during 2008.

Priority 5: Evaluation and sharing good practice

Respondents said that they would welcome wider sharing of good practice.

Examples of comments made by respondents:

“BSCF takes it as read that the Equality and Diversity Strategy must include rigorous monitoring and evaluation. An early warning system is essential if the policy goals are to be attained in a reasonable period of time”.

(British Sikh Consultative Forum)

“Regarding gathering and dissemination of best practice we would wish to see overt activity in this area for the future, from the CLG”

(Gloucestershire County Council FRA)

“The Authority would welcome guidance to be made available which highlights best practice and achievements in other working environments, particularly where that guidance relates to the more recently introduced diversity strands”.

(Lancashire FRS)

Response

As stated earlier in this document Communities and Local Government will be reviewing progress made by FRAs on an annual basis and publishing the information received in an Equality and Diversity report for the Fire and Rescue Service. This report will provide an effective source of good practice in addition Communities and Local Government, CFOA and LGA have agreed to work together to support the evaluation and dissemination of good practice.

8. Conclusion and way forward

The responses to the consultation were taken into consideration in preparing the final draft of the Fire and Rescue Service Equality and Diversity Strategy 2008-2018 for consideration by Communities and Local Government Ministers and the Equality and Diversity Programme Board. The Strategy (as published) reflects the amendments and additions proposed in the Communities and Local Government response to the consultation process as expressed in this document.

Appendix

List of respondents

Fire and Rescue Authorities/Services

1. Avon
2. Bedfordshire and Luton
3. Buckinghamshire and Milton Keynes
4. Cambridgeshire and Peterborough
5. Cheshire
6. Cleveland
7. Cornwall
8. Cumbria
9. Derbyshire
10. Devon and Somerset
11. Dorset
12. Durham and Darlington
13. East Sussex
14. Essex
15. Gloucestershire
16. Greater Manchester
17. Hampshire
18. Hereford and Worcester
19. Hertfordshire
20. Kent and Medway
21. Lancashire
22. Lincolnshire
23. London
24. Merseyside
25. Norfolk
26. Northumberland
27. Nottinghamshire
28. Oxfordshire
29. Royal Berkshire
30. Shropshire
31. South Yorkshire
32. Staffordshire
33. Suffolk
34. Tyne and Wear

- 35. Warwickshire
- 36. West Midlands
- 37. West Sussex
- 38. West Yorkshire
- 39. Wiltshire

Other Representative Organisations

- 40. Asian Fire Service Association
- 41. Chief Fire Officers' Association
- 42. Chief Fire Officers' Association Scotland
- 43. Fire Brigades Union
- 44. Fire Officers' Association
- 45. Local Government Association
- 46. Networking Women in the Fire Service
- 47. UNISON

Public Sector Bodies

- 48. Equality and Human Rights Commission
- 49. Firebuy

Others

- 50. A:gender
- 51. Jain network
- 52. British Humanist Association
- 53. Fitting In
- 54. British Sikh Consultative Forum
- 55. Institute of Fire Engineers

Individuals

- 56. Tracie Joliff
- 57. Bridget Schneider Browne
- 58. Carl Petch

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