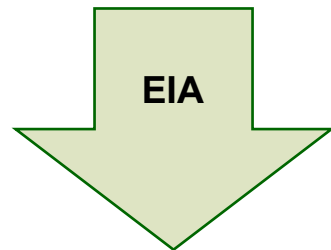


Warwickshire County Council (WCC) Equality Impact Assessment (EIA) Form

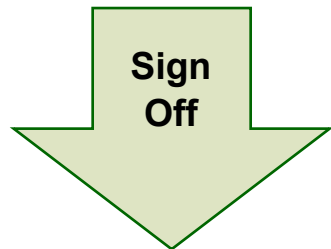
The purpose of an EIA is to ensure WCC is as inclusive as possible, both as a service deliverer and as an employer. It also demonstrates our compliance with Public Sector Equality Duty (PSED).

This document is a planning tool, designed to help you improve programmes of work by considering the implications for different groups of people. A guidance document is available [here](#).

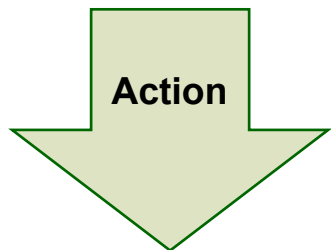
Please note that, once approved, this document will be made public, unless you have indicated that it contains sensitive information. Please ensure that the form is clear and easy to understand. If you would like any support or advice on completing this document, please contact the Equality, Diversity and Inclusion (EDI) team via equalities@warwickshire.gov.uk, or if it's relating to health inequalities, please contact Public Health via phadmin@warwickshire.gov.uk.



- Having identified an EIA is required, ensure that the EIA form is completed before any work is started. This includes gathering evidence and / or engaging the relevant stakeholders to inform your assessment.



- Brief the relevant Director for sign off and upload the completed form here: **Upload Completed Equality Impact Assessments**. Please name it "EIA [project] [service area] [year]"
- Undertake further research / engagement to further understand impacts (if identified).
- Undertake engagement and / or consultation to understand if EIA has identified and considered impacts.
- Amend accordingly to engagement / consultation feedback and brief decision makers of any changes.



- Implement proposed activity.
- Monitor impacts and mitigations as evidence of duty of care.

Section One: Essential Information

Service / policy / strategy / practice / plan being assessed	Resourcing to Risk - An Approach to WFRS Service Delivery Model (Model A)
Business Unit / Service Area	Warwickshire Fire & Rescue Service
Is this a new or existing service / policy / strategy / practice / plan? If existing, please state date of last assessment.	New
EIA Authors N.B. It is best practice to have more than one person complete the EIA to bring different perspectives to the table.	Scott Moultrie Rose Holme Ade Mallaban
Do any other Business Units / Service Areas need to be included?	Yes WCC Legal Services WCC Consultation and Engagement Lead WCC Business Intelligence WCC Human Resources Political Representatives Representative Bodies WCC Equality, Diversity & Inclusion

<p>Does this EIA contain personal and / or sensitive information?</p>	<p>No</p>
<p>Are any of the outcomes from this assessment likely to result in complaints from existing services users, members of the public and / or employees?</p>	<p>There will be impacts on current working arrangements (e.g., staff shift patterns) and delivery of our service (e.g., attendance times for incidents) which were subject to public, stakeholder and employee consultation. Relative to individual circumstances this has the potential to generate complaints.</p> <p>Whilst this initial assessment has been carried out to consider impacts, it is a live assessment that will be reviewed throughout the process to ensure that it remains current and valid.</p>

1. Please explain the background to your proposed activity and the reasons for it.

Resourcing to Risk refers to WFRS allocating its Prevention, Protection and Response resources based on our assessment of potential risks and hazards in Warwickshire. It is essentially having the right people, with the right skills, at the right time, in the right place. An independent analysis of WFRS Risk Analysis demonstrated that the locations of fire stations in Warwickshire generally match risk areas. However, the analysis also identified four key issues that WFRS need to address:

- Locations where appliances are based need to match risk and activity levels.
- Performance targets for attendance times to incidents are not being met.
- On-call fire appliance availability is reducing and raises challenges around sustainability.
- Some of WFRS's shift systems are not nationally accepted and other shift systems are not sustainable into the future.

2. Please outline your proposed activity including a summary of the main actions.

Based on the analysis undertaken, WFRS produced four potential delivery model options to align risk, demand and productivity levels with effective deployment of resources. The potential models enabled WFRS to dynamically move resources (fire appliances and staffing) around the county based on evidence, risk and incidents occurring.

The proposed model approved by Cabinet (09/11/2023) will ensure staff resource and appliance resource align to the higher risk times and locations, but this will involve changes to existing on-call and wholetime working patterns.

The consultation process resulted in a number of alternative proposals which have been reviewed by the service. An independent panel agreed the criteria to be applied to these proposals and after careful consideration (of all the alternative proposals that met the criteria),

Model A will go forward to Cabinet for approval.

3. Who is this going to impact and how?

Customers	Members of the Public	Employees	Job Applicants
No – n/a	<p>Yes The public may see a difference in visible resource in their local area at times. However, the overall impact should be positive as the purpose behind the change is to improve response times to incidents and ensure better, more effective, guaranteed response in line with the resourcing to risk approach.</p>	<p>Yes The proposal for consultation involves changes to existing working patterns including terms and conditions which will impact staff.</p> <p>Although the intention is to avoid redundancies, this is a potential impact.</p> <p>The proposed model creates wholetime firefighter vacancies generating opportunities for staff to be recruited to.</p>	<p>Yes Creates increased wholetime job opportunities.</p>
Other, please specify:	N/a		

Section Two: Evidence

Please include any evidence or relevant information that has influenced the decisions contained in this EIA. This could include demographic profiles; audits; research; health needs assessments; national guidance or legislative requirements and how this relates to the protected characteristic groups and additional groups outlined in Section Four.

A – Quantitative Evidence

This is evidence which is numerical and should include the number people who use the service and the number of people from the protected characteristic groups who might be affected by changes to the service.

Service Delivered to Public

WFRS serves a population in Warwickshire of over 599,000 (as at 2021). It is difficult to assess with any certainty the number of Warwickshire residents who are from the protected characteristic groups, however, it is not expected that the proposals for consultation will have a disproportionate impact on those that are from the protected characteristic groups as the proposals for change are intended to improve service delivery and service resilience for the population at large.

The following data related to service delivery has however been taken into account:

- ORH Modelling - A third party independent analysis/modelling, based on the last 5 years performance data and the last 3 years availability data.
- Risk Analysis.
- Prevention, Protection and Response Strategy.
- Warwickshire Joint Strategic Needs Assessment (JSNA) Data.
- Public consultation report – ‘Warwickshire Fire and Rescue Service (WFRS) - Public Consultation on Proposed Service Delivery Model: Report of Responses

Staffing

The Service employs approximately 186 wholetime firefighters.

The Service employs approximately 85 (actuals) on-call firefighters, in addition to this there are also 30 wholetime firefighters who also have a dual on-call contract when they are not carrying out their primary operational role for WFRS.

WFRS also have small number of non-operational staff working in support departments that also have an on-call contract.

Of those staff engaged on operational duties, we are aware of members of staff who have declared that they have a protected characteristic and who may be affected by the proposed changes. The method of consultation and implementation of any proposed changes as a result of the consultation will be tailored accordingly to take into account those with protected characteristics with reasonable adjustments being made as necessary.

B – Qualitative Evidence

This is data which describes the effect or impact of a change on a group of people, e.g., some information provided as part of performance reporting.

- ORH Modelling - A third party independent analysis/modelling based on the last 5 years performance data and the last 3 years availability data.
- Risk Analysis.
- Prevention, Protection and Response Strategy.
- Performance Dashboards.
- Public consultation report – ‘Warwickshire Fire and Rescue Service (WFRS) - Public Consultation on Proposed Service Delivery Model: Report of Responses

Section Three: Engagement

Engagement with individuals or organisations affected by the proposed activity must take place. For further advice and support with engagement and consultations, click [here](#).

Has the proposed activity been subject to engagement or consultation with those it's going to impact, taking into	Yes
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account their protected characteristics and socio-economic status?		
If YES, please state who with.	<p>WFRS received authority at the Cabinet meeting on 9th November 2023 to conduct a public consultation. A stakeholder assessment has been carried out and an engagement plan has been developed which commenced in October 2023, initially engaging WFRS staff.</p> <p>The public consultation concluded on 10.03.2024. The views of key stakeholders such as staff and members of the public have been analysed by WCC Business Intelligence and has been submitted as part of the final Cabinet Report (11.07.2024)</p> <p>The consultation process resulted in a number of alternative proposals which have been reviewed by the service. An independent panel agreed the criteria to be applied to these proposals and after careful consideration (of all the alternative proposals that met the criteria), Model A will go forward to Cabinet for approval.</p> <p>All relevant HR policies and legislation will be followed in relation to any subsequent staff consultation.</p>	
If NO engagement has been conducted, please state why.		
How was the engagement carried out?	Yes / No	What were the results from the engagement? Please list...
Focus Groups	Yes	Several focus groups have been carried out during the consultation including a group chaired by the CFO to listen to alternative models from WFRS employees.
Surveys	Yes	Consultation feedback was gathered from several survey sources including internal staff survey as well as through public consultation feedback.
Public Event	Yes	A significant number of public events have been held throughout the consultation calendar at town halls and other venues.

Displays / Exhibitions		
Other (please specify)		
Has the proposed activity changed as a result of the engagement?		The consultation process resulted in a number of alternative proposals which have been reviewed by the service. An independent panel agreed the criteria to be applied to these proposals and after careful consideration (of all the alternative proposals that met the criteria), Model A will go forward to Cabinet for approval.
Have the results of the engagement been fed back to the consultees?		Planned
Is further engagement or consultation recommended or planned?		Staff consultation is ongoing.
What process have you got in place to review and evaluate?	<p>The public consultation concluded on 10.03.2024. The views of key stakeholders such as staff and members of the public have been analysed by WCC Business Intelligence and has been submitted as part of the final Cabinet Report (11.07.2024)</p> <p>Final recommendations will then be presented to the Fire Authority for consideration. If a model is authorised through to implementation this phase will then be managed through the programme board including relevant review and evaluation.</p>	

Section Four: Assessing the Impact

Protected Characteristics and other groups that experience greater inequalities.

What will the impact of implementing this proposal be on people who share characteristics protected by the Equality Act 2010 or are likely to be affected by the proposed activity? This section also allows you to consider other impacts, e.g., health inequalities such as deprivation, socio-economic status, vulnerable groups such as individuals who suffer socio-economic disadvantage, armed forces, carers, homelessness, people leaving prison, young people leaving care etc.

On the basis of evidence, has the potential impact of the proposed activity been judged to be positive (+), neutral (=), negative (-), or positive and negative (+&-), for each of the protected characteristic groups below and in what way?

N.B In our Guidance to EIAs we have provided you with potential questions to ask yourself when considering the impact of your proposed activity. Think about what actions you might take to mitigate / remove the negative impacts and maximize on the positive ones. This will form part of your action plan at Section Six.

	Impact type (+) (=) (-) or (+&-)	Nature of impact including health inequalities Will your proposal have negative or positive implications for each group, including on health inequalities?	Mitigating Actions for Negative Impacts What can you do to mitigate any identified negative impacts or health inequalities? Use this column to form the basis of Section 6.
Age	+	People in this group are identified within our risk analysis. The proposal being consulted on should see a benefit for those in this vulnerable category based on the resourcing to risk approach. We will work with and across all our partnerships to ensure we reach as many people as possible to enable them to engage in our consultation process. The consultation was conducted via an online survey and was advertised via social media, newsletters and news release, Hard copies were available at	WFRS have a Prevention, Protection & Response Strategy that outlines our priorities and risk management approach which is based on a universal, targeted and specialist graded model for each statutory function. Prevention, Protection and Response. Mitigations in respect of access to the consultation to include access to

		<p>libraries and other public buildings. The option to send comments by post, e mail, or phone was also available.</p> <p>In relation to the WFRS staff, there is not considered to be any particular impact for this group.</p>	<p>paper copies, the ability to respond by post email or phone as well as online Advertising of the consultation was planned and delivered with the support of WCC Marcomms</p> <p>.</p>
<p>Disability Consider:</p> <ul style="list-style-type: none"> • Physical disabilities • Sensory impairments • Neurodiverse conditions (e.g., dyslexia) • Mental health conditions (e.g., depression) • Medical conditions (e.g., diabetes) 	+	<p>People in this group are identified within our risk analysis. The proposal being consulted on should see a benefit for those in this vulnerable category based on the resourcing to risk approach.</p> <p>We will work with our expert partners to ensure we reach as many people as possible to enable them to engage in our consultation process. The mitigations referenced in relation to Age will apply here also.</p> <p>In relation to the WFRS staff, there may be an impact for this group based on the number of affected staff who have a disability – both in terms of their ability to engage with the consultation and also the implementation of any proposed changes post consultation, if the changes put them at a disadvantage due to their disability.</p>	<p>WFRS have a Prevention, Protection & Response Strategy that outlines our priorities and risk management approach which is based on a universal, targeted and specialist graded model for each statutory function. Prevention, Protection and Response.</p> <p>Mitigations in respect of access to the consultation to include access to paper copies, the ability to respond by post email or phone as well as online. Advertising of the consultation was planned and delivered with the support of WCC Marcomms</p>
<p>Gender Reassignment</p>	=	<p>There is no impact identified for this group and there were no specific impacts raised through the consultation.</p>	

		In relation to the WFRS staff, there is not considered to be any particular impact for this group.	
Marriage and Civil Partnership	=	<p>There is no impact identified for this group and there were no specific impacts raised through the consultation.</p> <p>In relation to the WFRS staff, there is not considered to be any particular impact for this group.</p>	
Pregnancy and Maternity	=	<p>There is neutral impact identified for this group. However, once the child is born, this group will become part of the 'Young People (under 5s and under 11)' group and the following statement will apply to them.</p> <p>People in this group are likely to fall into our vulnerable category. Our targeted/specialist prevention, protection and response activity is aimed at protecting vulnerable residents including this group with protected characteristics. We will work with our expert partners to ensure we reach as many people as possible to enable them to engage in our consultation process and we will take steps to ensure we reach out and seek the views of young families'.</p> <p>The mitigations referenced in relation to Age will apply here also.</p> <p>In relation to the WFRS staff, there may be an impact for this group in terms of their ability to engage with the consultation e.g., through absence from the workforce. Mitigations specific to individual circumstances will be put in place to address this.</p>	WFRS have a Prevention, Protection & Response Strategy that outlines our priorities and risk management approach which is based on a universal, targeted and specialist graded model for each statutory function. Prevention, Protection and Response.
Race Including: • Colour	=	There is no impact identified for this group and there were no specific impacts raised through the consultation.	

<ul style="list-style-type: none"> Nationality Citizenship Ethnic or national origins 		In relation to the WFRS staff, there is not considered to be any particular impact for this group.	
Religion or Belief	+	<p>Candles are used in many religious events. Overcrowding may occur at religious venues during holidays. If there is no escape plan, delayed response could be an issue. Religious dress in some faiths can be flowing which when combined with cooking and candles could be a potential issue. The resourcing to risk proposal aims to provide the required resources and engagement to ensure people understand fire risks during these times.</p> <p>there were no specific impacts raised through the consultation.</p> <p>In relation to the WFRS staff, there is not considered to be any particular impact for this group.</p>	WFRS have a Prevention, Protection & Response Strategy that outlines our priorities and risk management approach which is based on a universal, targeted and specialist graded model for each statutory function. Prevention, Protection and Response.
Sex	=	<p>There is no impact identified for this group and there were no specific impacts raised through the consultation.</p> <p>In relation to the WFRS staff, there is not considered to be any particular impact for this group.</p>	
Sexual Orientation	=	<p>There is no impact identified for this group and there were no specific impacts raised through the consultation.</p> <p>In relation to the WFRS staff, there is not considered to be any particular impact for this group.</p>	
Groups who may require support: <ul style="list-style-type: none"> Individuals who suffer socio- 	+	Some of the higher risk people in this group are identified within our risk analysis.	WFRS have a Prevention, Protection & Response Strategy that outlines our priorities and risk management approach which is based on a

<p>economic disadvantage</p> <ul style="list-style-type: none"> • Armed Forces (WCC signed the <u>Armed Forces Covenant</u> in June 2012) • Carers • Homelessness • People leaving Prison • People leaving Care 		<p>The proposal being consulted on should see a benefit for those in this vulnerable category based on the resourcing to risk approach.</p> <p>We will work with our expert partners to ensure we reach as many people as possible to enable them to engage in our consultation process and we will take steps to ensure we reach out and seek the views of those in this group.</p> <p>The mitigations referenced in relation to Age will apply here also.</p> <p>In relation to the WFRS staff, there is not considered to be any particular impact for this group.</p>	<p>universal, targeted and specialist graded model for each statutory function. Prevention, Protection and Response.</p>
<p>Other Identified Health Inequalities (HI)</p> <p>Many issues can have an impact on health is it an area of deprivation, does every population group have equal access, unemployment, work conditions, education, skills, our living situation, rural, urban, rates of crime etc.</p>	<p>+</p>	<p>Some of the higher risk people in this group are identified within our risk analysis.</p> <p>The proposal being consulted on should see a benefit for those in this vulnerable category based on the resourcing to risk approach.</p> <p>The proposal and our targeted/specialist prevention, protection and response activity is aimed at protecting vulnerable residents including this group with protected characteristics.</p> <p>We will work with our expert partners to ensure we reach as many people as possible to enable them to engage in our consultation process and we will take steps to ensure we reach out and seek the views of those in this group.</p> <p>The mitigations referenced in relation to Age will apply here also.</p> <p>In relation to the WFRS staff, there is not considered to be any particular impact for this group.</p>	<p>WFRS have a Prevention, Protection & Response Strategy that outlines our priorities and risk management approach which is based on a universal, targeted and specialist graded model for each statutory function. Prevention, Protection and Response.</p>

Other Groups If there are any other groups			
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Public Sector Equality Duty (PSED)

Public Authorities must have 'due regard' to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations. Please evidence how your proposed activity meets our obligations under the PSED.

	Evidence of Due Regard
<p>Eliminate unlawful discrimination. (Harassment, victimisation and other prohibited conduct):</p>	<p>In relation to responding to emergencies, preventing emergencies and protecting the public, and supporting and developing our staff, WFRS services are intended to benefit all. Through our CRMP planning process and in particular the resourcing to risk proposal we plan and maintain our service to all members of the public. We actively continue to target the more vulnerable members of our communities, (who may have a particular protected characteristic such as older age or disability) through our prevention and protection work. The resourcing to risk proposal is aimed at ensuring our resources are in the right place and at the right time and is evidenced based.</p> <p>The consultation was undertaken in a way that mitigates as far as possible any difficulties experienced by different groups in accessing information and having their concerns heard.</p> <p>In relation to consultation with staff all HR policies and employment legislation will be adhered to, and this will include ensuring Equality Act requirements are met and decisions taken appropriately and lawfully.</p>

<p>Advance equality of opportunity:</p> <p>This involves.</p> <ul style="list-style-type: none"> • removing or minimising disadvantages suffered by people due to their protected characteristics. • taking steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people, for example, taking steps to take account of people with disabilities. • encouraging people with certain protected characteristics to participate in public life or in other activities where their participation is disproportionately low. 	<p>In relation to responding to emergencies, preventing emergencies, and protecting the public, and supporting and developing our staff, WFRS services are intended to benefit all. Through our CRMP planning process and in particular the resourcing to risk proposal we plan and maintain our service to all members of the public. We actively continue to target the more vulnerable members of our communities, (who may have a particular protected characteristic such as older age or disability) through our prevention and protection work. The resourcing to risk proposal is aimed at ensuring our resources are in the right place and at the right time and is evidenced based.</p>
<p>Foster good relations:</p> <p>This means tackling prejudice and promoting understanding between people from different groups and communities.</p>	<p>WFRS conducted a public consultation on the resourcing to risk proposal using WCC’s consultation platform and WFRS and WCC’s social media to connect with communities, staff, partners, and representative bodies.</p> <p>WFRS’s Community Engagement officer was actively involved to ensure we reach a diverse and wide-ranging audience. Through the work of our community engagement officer and our station network we continue to foster good relations with all our communities.</p> <p>WFRS Senior Management continue to engage with staff and unions regarding Model A.</p>

Section Five: Partners / Stakeholders

Which sectors are likely to have an interest in or be affected by the proposed activity?	Yes / No	Describe the interest / affect
Businesses	Y	All stakeholders in this list will have an interest in and be impacted in how the Fire Service discharges its statutory functions in Warwickshire
Councils	Y	
Education Sector	Y	
Fire and Rescue	Y	
Governance Structures	Y	
NHS	Y	
Police	Y	
Voluntary and Community Sector	Y	
Other(s): please list and describe the nature of the relationship / impact		

Section Six: Action Planning

If you have identified impacts on protected characteristic groups in Section Four, please summarise these in the table below detailing the actions you are taking to mitigate or support this impact. It is also important to consider how often this E.I.A. will be reviewed, and who is

responsible for doing this. If you are not taking any action to support or mitigate the impact, you should complete the No Mitigating Actions section below instead.

Mitigating Actions

Consider:

- Who else do you need to talk to? Do you need to engage or consult?
- How you will ensure your activity is clearly communicated
- Whether you could mitigate any negative impacts or build on positive impacts for protected groups or health inequalities
- Whether you could do more to fulfil the aims of the PSED
- How you will monitor and evaluate the effect of this work
- Anything else you can think of!

Identified Impact	Action(s)	Timescale incl. evaluation and review date	Name of person responsible
There are no identified negative impacts under the resourcing to risk proposals, however if any come to light during the approval and implementation phases appropriate action will be taken to address the impact.	WFRS Senior Management will continue to engage with staff and unions regarding Model A.		
With regard to the consultation exercise, impacts and mitigations			

are highlighted in this assessment and will be kept under review.			
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No Mitigating Actions

Please explain why you do not need to take any action to mitigate or support the impact of your proposed activity.

Section Seven: Assessment Outcome

Only one of following statements best matches your assessment of this proposed activity. Please select one and provide your reasons.		
No major change required.		
The proposal has to be adjusted to reduce impact on protected characteristic groups and/or health inequalities.		
Continue with the proposal but it is not possible to remove all the risk to protected characteristic groups and/or health inequalities	X	The proposal at this stage requires approval by Cabinet
Stop the proposal as it is potentially in breach of equality legislation.		

Section Eight: Sign Off

N.B To be completed after the EIA is completed but before the area of work commences.

Name of person/s completing EIA	Sally Waldron
Name and signature of Director	Ben Brook - Chief Fire Officer
Date	03/11/2023 - Initial 08/12/2023 - Reviewed Scott Moultrie 30/04/2024 - Reviewed 03/06/2024 - Reviewed (Model 1) 13/06/2024 - Reviewed (Model A) Dan Glorioso
Date of next review and name of person/s responsible	August 2024