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Completed by
Governance Team

LONDON FIRE BRIGADE

London Fire Brigade, gender, ethnicity and disability Pay Gap report 2023

Report to:

Service Delivery Board
Commissioner's Board
Deputy Mayor's Fire and Resilience Board.....

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24 January 2024
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London Fire Commissioner

Report by:

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For information

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PART ONE

Non-confidential facts and advice to the decision-maker

Executive Summary

Under the Equality Act 2012, the London Fire Commissioner ('LFC') is obligated to publish information relating to the gender pay gap of its employees.

There is no statutory obligation to publish ethnicity or disability pay gap information, but this is good practice, particularly in demonstrating how the LFC meets the Public Sector Equality Duty to advance equality of opportunity.

This is the second year the London Fire Brigade (LFB) has produced a combined pay gap report providing the following analysis for our:

- gender pay gap;
- ethnicity pay gap; and,
- disability pay gap.

This report covers the period commencing 1 April 2022 to 31 March 2023 should be read alongside our pay gap action plan which is shown in detail at Appendix A.

Recommended decision(s)

For the London Fire Commissioner

1. That the London Fire Commissioner notes the report

For the Deputy Mayor

2. That the Deputy Mayor for Fire and Resilience notes the report.

1. Introduction

- 1.1 The London Fire Commissioner (LFC) and the Deputy Mayor for Fire and Resilience are obligated to consider the Public Sector Equality Duty (section 149 of the Equality Act 2010) when making decisions. This essentially involves identifying and evaluating the potential effects of policies and decisions on various individuals, incorporating this understanding into the decision-making process, and then documenting how these decisions were made.
- 1.2 During this reporting period (April 2022 to March 2023), an independent review into the Culture of LFB was conducted. The report containing the findings of this review was published in November 2022, and the LFC has accepted all of its recommendations. The complete report, along with the LFC's formal response, can be found on the LFB website. We are currently in the process of implementing the recommendations and any equality related activities are contained in our attached action plan.
- 1.3 As of 31 March 2023, our HR data recorded 5686 employees working at the London Fire Brigade (LFB). The organisation does not have a bonus scheme and is made up of three distinct staff groups who are employed under different terms and conditions:
 - Operational - typically, staff who are based at our 103 fire stations across London in firefighting roles;
 - Control - typically, staff who are based at our Control Centre managing the emergency calls for the organisation; and,
 - FRS Staff – typically, staff who are based at our headquarters office providing corporate enabling services such as finance, procurement or communications.
- 1.4 Any staff currently on reduced pay (due to unpaid or partially paid leave e.g. maternity, sickness, career breaks) are excluded from this report, as are all volunteers and agency staff.
- 1.5 Our collection of ethnicity, and disability data relies solely on self-declaration by staff via our internal HR system, whereas gender is a mandatory recording field when staff join the LFB. As Figure 1 shows disclosure rates remain high at over 96%, with gender consistently at 100% since 2020, ethnicity: from 97.8%, to 97.6% to 96.4% in 2023 (so slightly fewer numbers of staff disclosed) and for disability: from 98.3% to 97.9% to 96.8% in 2023 (so slightly fewer numbers of staff disclosed). At the same time, the total number of staff has increased, so the decline in disclosure must be considered in relation to the increasing staff number. More detailed analysis for ethnicity and gender is provided in the sections below. It must be noted that the selection of 'not known' and 'prefer not to say' are not included in the disclosure rates but they count as

participation. The eligibility criteria for analysis means that this report is based on a total of 5632 staff, and the breakdown across each group is shown in the table below (figure 1).

	2020	2022	2023
Total LFB Employees	5820	5600	5686
Eligible for inclusion in pay gap analysis	5755	5554	5632
Gender	5755 (disclosure rate 100%)	5554 (disclosure rate 100%)	5632 (disclosure rate 100%)
Ethnicity	5629 (disclosure rate 97.8%)	5418 (disclosure rate 97.6%)	5430 (disclosure rate 96.4%)
Disability	5658 (disclosure rate 98.3%)	5440 (disclosure rate 97.9%)	5449 (disclosure rate 96.8%)

Figure 1

- 1.6 Gender 'equal pay' is a measure that indicates whether men and women are paid the same for performing work of equal value. Upholding 'equal pay' is a legal requirement and organisations must put in place processes to ensure staff are paid fairly, which at LFB includes job evaluation and a standardised approach to job grading and reward.
- 1.7 The gender, ethnicity and disability pay gap analysis is different. It measures the difference between the average pay for all men and women, different ethnic groups and people with disabilities and those without disabilities, regardless of their role or seniority.
- 1.8 This report is one of the tools we use to help us to measure progress against our overarching objective and commitment to lead on tackling inequalities and to develop the workforce reflective of London.

2. Summary of findings

- 2.1 Across the London Fire Brigade there is a pay gap in favour of women at LFB.
- 2.2 For full time staff, there is a pay gap in favour of women. For part time staff, there is a pay gap in favour of men.
- 2.3 For Operational Staff, there is a pay gap in favour of men. However, there is a pay gap in favour of women for FRS and Control staff.

2.4 32% of all LFB staff and 39% of Operational Staff are on the same salary band (Firefighter Competent plus). Therefore, our pay gap tends to be less pronounced as any disparities are masked by the significant clustering of salaries.

2.5 There is a pay gap disadvantaging our staff from unrepresented ethnic groups at LFB. Our analysis showed a range of disparities for this group, both with White colleagues and across the different staff groups, as well as following intersectionality considerations. We found that our:

- Asian/Asian British men in Operational roles have a smaller difference in pay compared to Asian/Asian British men in FRS roles. The statistical difference is more likely influenced by the difference in salary distribution between FRS and Operational staff. We found similar results for Black/Black British men in the same staff groups, but the pay gaps were larger. In both cases, the pay gap favours White men.
- Asian/Asian British women experience the largest pay gap among all ethnically underrepresented groups, but there are fewer than ten Asian/Asian British women working in Operations and Control, so these results are based on very small numbers.
- In FRS roles, men from mixed and other ethnic backgrounds are, on average, paid less than White men. Similarly, in Control roles, men from mixed and other ethnic backgrounds also experience pay differences compared to white men, who on average, earn more.
- In FRS, White men have higher earnings compared to Black or Black British men.

2.6 There is a pay gap in favour of staff with disabilities at LFB, which may relate to the higher rate of representation of staff with disabilities in FRS and Control compared to Operations.

3. Methodology

3.1 The pay gap is calculated in accordance with government guidance using the formula below:

$$\frac{A - B}{A} \times 100$$

	Variable in pay gap formula	Mean/median hourly rate of pay of which group of staff?
Gender pay gap	A	Men
	B	Women
Ethnicity	A	White staff
		Ethnically diverse staff Asian or Asian British staff

pay gap	B	Black or Black British staff Mixed ethnicities staff Other Ethnic Group staff
Disability	A	Non-disabled staff
pay gap	B	Disabled staff

Figure 2

3.2 The **MEDIAN** pay gap is the difference between the midpoints in the ranges of hourly earnings of two different staff groups (such as men and women). The median pay is calculated by ordering the salaries from lowest to highest and identifying the salary in the middle. The median pay is the difference between the two groups is the pay gap. This calculation is useful for understanding the differences in the top and bottom end of the pay scales across each group and can illustrate the numbers of staff in higher and lower grades/ranks.

Example: Calculating the Median Pay Gap using hourly rate

Out of 5,686 employees in an organisation, 4,654 are men, and 1032 are women. Among men, the middle-earner receives £21.16 per hour, and among women, the middle-earner receives £22.23 per hour.

To calculate the median pay gap in percentage we find the difference in earnings between the middle-earning woman and man: $£22.23 - £21.16 = £1.07$. Then calculate the percentage difference relative to the man's earnings: $(£1.07 / £21.16) * 100 = 5.06\%$.

This means that in this scenario, on average, women make 5.06% more per hour than men.

Figure 3

3.3 The **MEAN** pay gap is the difference between the average hourly earnings of two different staff groups (such as men and women). The mean pay is calculated by adding up all the salaries and dividing by the number of staff. This calculation is useful for understanding the overall average salary of any group however, as it takes into consideration every salary, it is sensitive to outliers (very high or very low salaries) which means that the minority pay may sometimes mask the pay of the majority, which skews the results.

Example: Calculating the Mean Pay Gap using hourly rate

Men's hourly pay rate is £21.16, and the women's hourly pay rate is £22.23.

Out of 5,686 employees in an organisation, 4,654 are men, and 1032 are women. Among men, the mean salary is £21.16 per hour, and among women, the mean salary is £22.23 per hour.

To calculate the mean pay gap in percentage we find the difference in earnings between the mean salary for men and the mean salary for women ($£22.23 - £21.16 = £1.07$). Then calculate the percentage difference relative to the man's earnings: $(£1.07 / £21.16) * 100 = 5.06\%$.

Figure 4

- 3.4 In this report, we will provide analysis using both the middle pay (median)/the average pay (mean) to provide additional clarification to potential differences in pay gap.
- 3.5 A positive gender pay gap indicates that men on average earn more than women and a negative gender pay gap indicates that women on average earn more than men.
- 3.6 A positive ethnicity pay gap means that white staff on average earn more than ethnically underrepresented staff. On the other hand, a negative ethnicity pay gap means ethnically underrepresented staff on average earn more than white staff.
- 3.7 A positive disability pay gap means that on average staff without disabilities earn more than staff who have declared a disability and a negative disability pay gap means that staff with disabilities on average earn more than those without.
- 3.8 Our ambition is to get to a position where there is no disparity of pay across our different staff groups.
- 3.9 With effect from 1 April 2018, the individual holding the office of London Fire Commissioner is appointed by the Mayor of London and is not considered an employee of the LFB for the purpose of pay reporting. However, in the interest of transparency, the Commissioner's pay has been included for the purposes of this report.

4. Gender

- 4.1 LFB gathers information regarding both sex and gender identity of its employees. Previous data used for gender pay gap reports focused solely on the binary categorisation of male and female. We acknowledge that some colleagues may identify beyond this binary framework, recognising that sex and gender are not synonymous for everyone. LFB embraces and values colleagues of all gender identities. We actively acknowledge non-binary identities and collaborate with our internal LGBTQ+ staff network and other partners to assess our HR policies and communications, ensuring the use of inclusive, gender-neutral language throughout.
- 4.2 In this report, the gender pay gap is calculated by comparing the overall pay of male staff against female staff. The category 'gender' refers to men and women, and the number of the latter has increased each year since 2018.
- 4.3 Our HR data indicate there are 5686 staff working across the organisation and 18.3% are women (1039). This is further broken down across our three staff groups as follows:
- 4630 Operational: 89.81% men (4158) 10.21% women (473)
 - 110 Control: 24.55% men (27) 75.45% women (83)
 - 946 FRS: 48.94% men (463) 51.06% women (483)

	2018	2019	2020	2021	2022	2023
Women	806	851	914	982	989	1039
Men	4729	4888	4855	4839	4611	4647

Total LFB Staff	5535	5739	5769	5821	5600	5686
% Women	14.56%	14.83%	15.84%	16.87%	17.66%	18.27%

Figure 5

4.4 Amongst the FRS Staff eligible for pay gap analysis, 19.6% of women (94 out of 479) hold senior positions at or above the grade of FRS F, compared with 21.8% of men (101 out of 463) at the same grades. The greatest gender disparity is evident at FRS TMG grades where 65.38 of men hold those positions in comparison to women who hold 36.61%.

FRS Grade	Women	Men	All staff	% of women at each grade
TMG and above	1.9% (9 out of 479)	3.7% (17 out of 463)	2.8% (26 out of 942)	36.61% (women) 65.38% (men)
FRS G	5.6% (27 out of 479)	5.6% (26 out of 463)	5.6% (53 out of 942)	50.94% (women) 49.05% (men)
FRS F	12.1% (58 out of 479)	12.5% (58 out of 463)	12.3% (116 out of 942)	50% (women) 50% (men)
FRS E	18.4% (88 out of 479)	12.3% (57 out of 463)	15.4% (145 out of 942)	60.68 (women) 39.31% (men)
FRS D	21.9% (105 out of 479)	27.4% (127 out of 463)	24.6% (232 out of 942)	45.25 (women) 54.74% (men)
FRS C	23.8% (114 out of 479)	24.6% (114 out of 463)	24.2% (228 out of 942)	50% (women) 50% (men)
FRS B	16.3% (78 out of 479)	13.8% (64 out of 463)	15.1% (142 out of 942)	54.92 (women) 45.07% (men)
Total FRS staff	479	463	942	50.84 (women) 49.15% (men)
%	50.8%	49.2%	100%	

Figure 6

4.5 Amongst the Operational staff eligible for pay gap analysis, the table below (figure 6a) shows that 3.44% of women (16 out of 465) hold senior positions at or above the ranks of Station Commander, compared with 5.17% of men (213 out of 4115) at the same rank. The greatest gender disparity is evident at the rank of Station Commander, while at Assistant Commissioner and above, these positions are exclusively held by men.

Operational Rank	Women	Men	All staff	% of women at each grade
Group Commander and above	1.7% (8 out of 465)	2.16% (89 out of 4115)	2.11% (97 out of 4,580)	8.24% (women) 91.75% (men)
Station Commander	1.7% (8 out of 465)	3.0% (124 out of 4115)	2.88% (132 out of 4,580)	6.06% (women) 93.93% (men)
Station Officer	3.0% (14 out of 465)	6.3% (261 out of 4115)	6% (275 out of 4,580)	5.09% (women) 94.90% (men)

Sub Officer	6.7% (31 out of 465)	10.1% (414 out of 4115)	9.71% (445 out of 4,580)	6.96% (women) 93.03% (men)
Leading Firefighter	6.7% (31 out of 465)	11.0% (453 out of 4115)	10.56% (484 out of 4,580)	6.40% (women) 93.59% (men)
Firefighter	77.0% (358 out of 465)	66.3% (2728 out of 4115)	67.37% (3,086 out of 4,580)	11.60% (women) 88.39% (men)
Trainee Firefighter	3.2% (15 out of 465)	1.1% (45 out of 4115)	1.31% (60 out of 4,580)	25% (women) 75% (men)
Total Operational Staff	465	4115	4580	10.15% (women) 89.84% (men)
%	10.15%	89.84%	100%	

Figure 6a

4.6 Amongst the Control staff eligible for pay gap analysis, the table below (figure 6b) shows that while women make up the majority of staff, when it comes to senior roles at Assistant Operations Manager and above, proportionately, they are slightly underrepresented 32.5% (27 out of 83) than men 33.33% (9 out of 27).

Control Rank / Grade	Women	Men	All staff	% of women at each grade
Operations Manager and above	6.02% (5 out of 83)	11.11% (3 out of 27)	7.27% (8 out of 110)	62.5% (women) 37.5% (men)
Assistant Operations Manager	26.5% (22 out of 83)	22.2% (6 out of 27)	25.45% (28 out of 110)	78.57% (women) 21.42% (men)
Control Room Officer	67.5% (56 out of 83)	66.7% (18 out of 27)	67.27% (74 out of 110)	75.67% (women) 4.32% (men)
All Control Staff	83	27	110	75.45% (women) 24.54% (men)
%	75.45%	24.54%	100%	

Figure 6b

4.7 Gender pay gap

A positive gender pay gap indicates that men on average earn more than women and a negative gender pay gap indicates that women on average earn more than men.

4.8 As of 31 March 2023, overall, as indicated in the table below (figure 7), across the organisation both the mean and median gender pay gaps have reduced. The figures show that the mean gender pay gap is -5.07% having decreased by 2.35% from 2022, and the median pay gap is -0.4%, which is a significant reduction of 5.06% compared to 2022 (-5.46%). This is slightly in favour of women. On the face of it, this suggests that as a group, on average men and women are practically earning the same however, when broken down into different staff groups there are disparities.

	Median			Mean		
	Median pay gap (2022)	Median pay gap (2023)	Median pay gap (% point change)	Mean pay gap (2022)	Mean pay gap (2023)	Mean pay gap (% point change)
Gender						
Women (vs Men)	-5.46%	-0.40%	+5.06%	-7.42%	-5.07%	+2.35%

Figure 7

4.9 The main reason for this years' narrowing pay gap was due to the trainee firefighter intake during 2022/23. 64 out of 228 trainee joiners were women (28.07%), this represents the highest ever annual intake of women (both in terms of % and numbers). The consequence is a larger % of women on a lower operational pay scale, thus narrowing the pay gap.

4.10 To better show how men and women's pay is distributed, we divide the salaries into four equal groups (quartile 1 is the lowest pay and quartile 4 the highest) and then analyse how many men and women are in each. As each quartile represents 25% of the workforce, it helps us to see whether there is a fair representation of men and women and thus a fair distribution of pay across each.

4.11 The result of this analysis is shown in the tables below (figure 8 and 9), where a positive pay gap for a quartile indicates men earn more, and negative numbers that women earn more.

Median Quartile	Men			Women			Pay gap (%)
	Employees (%)	Hourly pay (£)	Employees (%)	Hourly pay (£)			
Quartile 4	1037	73.67%	£24.31	371	26.33%	£25.72	-5.76%
Quartile 3	1251	88.88%	£20.66	157	11.12%	£21.20	-2.62%
Quartile 2	1270	90.20%	£19.29	138	9.80%	£19.29	-0.01%
Quartile 1	1047	74.36%	£18.81	361	25.64%	£18.00	4.32%

Figure 8

4.12 The median analysis in the table above (figure 8) shows the following:

- Quartile 4: On average (highest salaried) women earn 5.76% more.
- Quartile 3: on average, women earn 2.62% more.
- Quartile 2: men and women earn, on average, the same pay, with a statistically insignificant difference.

- Quartile 1 (lowest salaried) men, on average, earn 4.32% more.

Mean Quartile	Men		Women			Pay gap (%)	
	Employees (%)	Hourly pay (£)	Employees (%)	Hourly pay (£)	Hourly pay (£)		
Quartile 4	1037	73.67%	£27.64	371	26.33%	£28.67	-4.07%
Quartile 3	1251	88.88%	£20.52	157	11.12%	£20.83	-1.52%
Quartile 2	1270	90.20%	£19.30	138	9.80%	£19.30	-0.01%
Quartile 1	1047	74.36%	£17.85	361	25.64%	£17.35	2.82%

Figure 9

4.13 The mean analysis in the table above (figure 9) shows the following:

- Quartile 4: (highest salaried) women, on average, earn 4.07% more.
- Quartile 3: men, on average, earn 1.52% more.
- Quartile 2: men and women have nearly the same pay, with a statistically insignificant difference.
- Quartile 1 (lowest salaried) men, on average, earn 2.82% more than women.

4.14 To assess whether there is a disparity in pay for women, we break our analysis down even further to identify where there may be an over or under representation in an area of pay. To do so we break down the salaries into £10,000 increments up to £100,000 with those earning more than £100,000 placed into a single group.

4.15 The table below (figure 10) shows the proportion of women across each salary band of £10,000. It illustrates an increasing trend of representation of women in the lower salary bands are more likely to be staffed by women than men, with a significant rise over the past two years.

	2018	2019	2020	2021	2022	2023
< £20,000	0.00%	83.33%	No roles at LFB attracted salaries below £20,000			
£20,000 - £29,999	29.98%	21.38%	20.85%	26.50%	44.37%	60.78%
£30,000 - £39,999	11.47%	12.93%	13.95%	14.76%	17.24%	40.17%
£40,000 - £49,999	16.37%	13.35%	13.80%	14.83%	14.26%	13.45%
£50,000 - £59,999	18.00%	21.67%	28.26%	32.12%	34.44%	20.06%
£60,000 - £69,999	23.88%	18.10%	20.00%	20.71%	23.98%	23.95%
£70,000 - £79,999	33.33%	26.32%	25.58%	22.37%	24.05%	22.50%
£80,000 - £89,999	20.00%	17.39%	14.29%	25.81%	24.14%	21.50%
£90,000 - £100,000	0.00%	0.00%	0.00%	23.08%	0.00%	19.05%

£100,001 >	20.00%	23.53%	26.67%	30.43%	28.57%	21.88%
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Figure 10

4.16 Gender pay gap – across our staff groups

4.17 The graphs below (figures 11 and 12) show the median and mean gender pay gaps for all staff and also across our three occupational groups. They are helpful to identify trends in pay across the past five years.

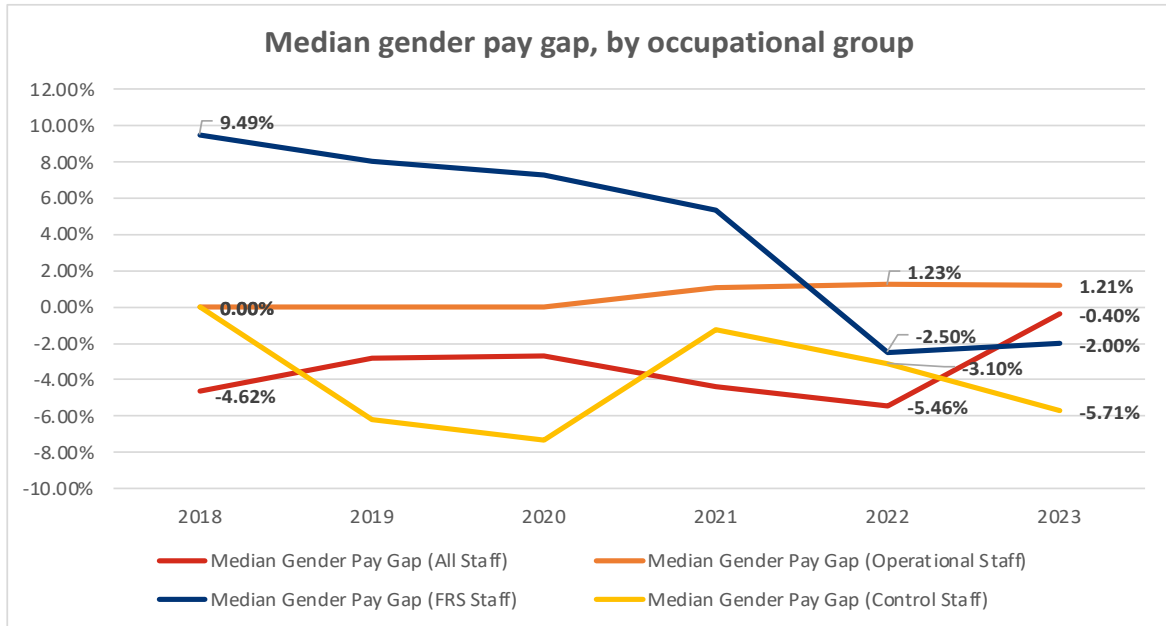


Figure 11

4.18 Overall, for all staff, there is a decrease in both the mean and median gender pay gap over five years (from 2018). The median currently stands at -0.40 % and the mean -5.07 %, in favour of women, who on average, earn 5.07% more than men.

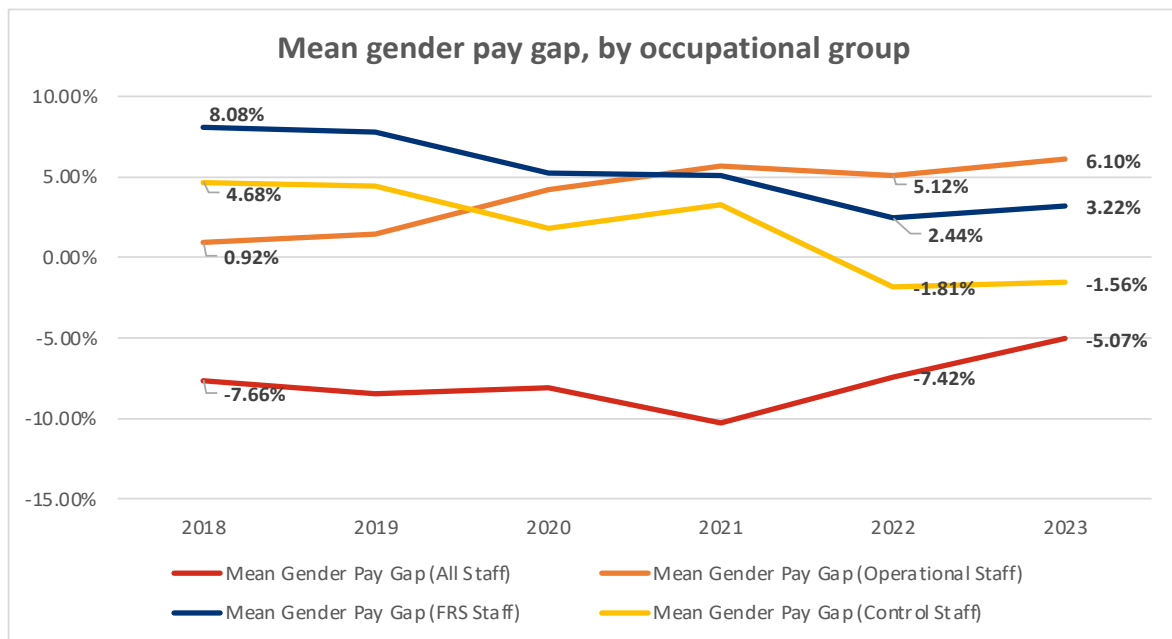


Figure 12

- 4.19 For our Operational staff, there has been an increase in both the mean and median gender pay gap over five years (from 2018). The median currently stands at 1.21% and the mean 6.10%, both in favour of men whose mean hourly pay is £1.26 more than women in Operational roles.
- 4.20 Due to our pay structure, the median calculation for Operational roles is unlikely to show much difference in pay gap due to this staff group predominantly comprising of men (89%) and the heavily clustered distribution of salary amongst operational staff. In contrast, the mean calculation reflects the fact that a large percentage of staff are paid the same salary. But the mean is also more influenced by outliers, i.e. staff in senior roles on much higher salaries: there are proportionately more men in senior operational roles (Station Commander and above) which attract higher salaries. 5.17% of men (213 out of 4115) are recorded at the rank of Station Commander and above, in contrast to only 3.44% of women (16 out of 465).
- 4.21 For our Control staff, there is a steady decline in the pay gap which is more pronounced in recent years. The median currently stands at -5.71% and the mean is -1.56%, this is in favour of women, whose mean hourly earnings are £0.34 more than men in Control roles.
- 4.22 For our FRS staff, there is a steady decrease in both the mean and median gender pay gap over five years (from 2018) with a slight uptick last year (2022) which, has resulted in the median currently standing at -2.00% and the mean at 3.22%.
- 4.23 There is an almost equal number of men and women across all FRS staff, and of the women 20% (94 out of 479) hold senior positions above the grade of FRS F, which is similar to the 22% representation of men (101 out of 479) at the same grades.

4.24 In summary, overall, our analysis shows that across all staff, the gender pay gap has decreased over five years, with women currently earning a mean hourly salary of 5.07% more than men on average. In Operational roles, men have a slight advantage, with a median pay gap of 1.21% and a mean of 6.10%. This is influenced by a higher proportion of men in senior roles. Control staff experience a pay gap in favour of women, with a median of -5.71% and a mean of -1.56%. This is attributed to more women in senior Control positions. In FRS roles, there has been a decrease in the pay gap, but men receive a mean hourly salary of 3.22% more than women.

5. Ethnicity

5.1 LFB recognises that staff from different ethnic backgrounds will have their own unique identity and lived experiences however, for reporting purposes we use the term ‘ethnically underrepresented groups’ as an objective reflection of this staff group within LFB. This includes staff who have self-identified as Black, Asian, of mixed, multiple or other ethnic groups. Staff can select their ethnic group from a more detailed list, and where possible and appropriate, we will provide the pay gap analysis of these specific sub-groups.

5.2 In this report, the ethnicity pay gap is calculated by comparing the overall pay of staff belonging to ethnically underrepresented groups against White staff. The category ‘White’, includes White British, White Irish and White Other.

5.3 Our HR data indicates there are 1000 staff working across the organisation who have self-declared as belonging to an ethnically underrepresented group. This is further broken down across our three staff groups as follows:

- 4630 Operational: 15.27% (707)
- 110 Control: 17.27% (19)
- 946 FRS: 28.96% (274)

The table below (figure 13) shows that the number of staff declaring as belonging to an ethnically underrepresented group has increased year on year since 2018, as has the number of staff who chose ‘prefer not to say’ and ‘not known’, albeit only slightly.

	2018	2019	2020	2021	2022	2023
Ethnically Underrepresented Group	863	891	910	963	964	1000
Asian/Asian British	158	162	167	174	177	183
Black/Black British	384	386	384	406	404	411
Mixed ethnicity	252	264	270	288	295	313
Other ethnic group	69	79	89	95	88	93
White	4600	4766	4781	4733	4502	4484
Not Known	72	82	76	109	107	164
Prefer not to say	0	0	2	16	27	38

Total	5535	5739	5769	5821	5600	5686
%	15.6%	15.5%	16.0%	16.5%	17.2%	17.6%

Figure 13

5.4 Ethnicity pay gap

A positive ethnicity pay gap means that white staff on average earn more than ethnically underrepresented staff. On the other hand, a negative ethnicity pay gap means ethnically underrepresented staff on average earn more than white staff.

5.5 As at 31 March 2023, overall, as indicated in the table below (figure 14), across the organisation both the mean and median ethnicity pay gaps have reduced. The median ethnicity pay gap is 0.73%, which has decreased by 0.1% compared to last year (2022) and the mean is 4.22%, down by 0.30% from 2022 (we have also provided additional breakdown for different underrepresented ethnic groups). On the face of it, this suggests that, on average, white staff's mean hourly salary is 4.22% more than the mean salary for ethnically underrepresented groups.

Ethnicity	Median			Mean		
	Median pay gap (2022)	Median pay gap (2023)	Median pay gap (% point change)	Mean pay gap (2022)	Mean pay gap (2023)	Mean pay gap (% point change)
Under-represented Ethnic Groups	0.83%	0.73%	-0.10%	4.52%	4.22%	-0.30%
Asian Asian British	0.14%	0.19%	0.05%	2.19%	1.31%	-0.88%
Black Black British	0.69%	0.57%	-0.12%	3.85%	3.50%	-0.35%
Mixed Ethnicity Other Ethnic Group	1.06%	0.94%	-0.12%	6.28%	6.22%	-0.06%

Figure 14

5.6 The data (figure 14) shows a slight decrease in pay gaps for most ethnic groups between 2022 and 2023, with a slight increase in the pay gap for Asian/Asian British staff. Overall, there's a positive trend, with little change compared to last year with decreases in median and mean pay gaps for several groups, like Black or Black British and Mixed or Other Ethnic Groups.

5.7 To better show how the pay of our ethnically underrepresented groups is distributed, we divide the salaries of this group and our White staff into four equal groups (quartile 1 is

the lowest pay and quartile 4 the highest) and then analyse how many staff from both sets are in each. As each quartile represents 25% of the workforce, it helps us to see whether there is a fair representation and thus a fair distribution of pay across each.

5.8 The result of this analysis is shown in the tables below (figure 15 and 16), where a positive pay gap for a quartile indicates White staff earn more, and negative numbers that Ethnically underrepresented groups earn more.

	White staff			Ethnically Under-represented Groups			
Median Quartile	Employees (%)		Hourly pay (£)	Employees (%)		Hourly pay (£)	Pay gap (%)
Quartile 4	1014	83.97%	£24.37	218	16.03%	£24.36	0.05%
Quartile 3	1133	84.74%	£20.70	207	15.26%	£21.01	-1.51%
Quartile 2	1150	83.45%	£19.29	225	16.55%	£19.32	-0.16%
Quartile 1	1140	74.73%	£18.82	343	25.27%	£18.02	4.24%

Figure 15

	White staff			Ethnically Under-represented Groups			
Median Quartile	Employees (%)		Hourly pay (£)	Employees (%)		Hourly pay (£)	Pay gap (%)
Quartile 4	1014	83.97%	£27.99	218	16.03%	£27.07	3.31%
Quartile 3	1133	84.74%	£20.54	207	15.26%	£20.70	-0.78%
Quartile 2	1150	83.45%	£19.30	225	16.55%	£19.31	-0.07%
Quartile 1	1140	74.73%	£17.95	343	25.27%	£17.39	3.16%

Figure 16

5.9 To assess whether there is a disparity in pay for our staff from ethnically underrepresented groups, we break our analysis down even further to identify where there may be an over or under representation in pay. To do so we break down the salaries into £10,000 increments up to £100,000 with those earning more than £100,000 placed into a single group.

5.10 The table below (figure 17) shows the proportion of staff from ethnically underrepresented groups across each salary band for all staff groups. It illustrates that most of this group, over 90%, are not in roles that attract salaries above £50,000. Only 8% of staff from ethnically underrepresented groups attract salaries of above £50,000, a figure that is almost doubled for White staff as 13.7% are in roles attracting salaries above £50,000.

5.11 This is further supported by the tables below (figures 20, 22 and 23), which break down ethnically underrepresented groups across each staff group. Figure 20 in particular illustrates that operationally there is an over representation of staff from ethnically underrepresented groups at the rank of Fire Fighters, which in turn represent the largest employee group at LFB.

All Staff			
Salary	Ethnically underrepresented groups (993)	White (4437)	All staff
<=£20,000	All roles at LFB attract salaries above £20,000		
£20,001 to £30,000	2.0% (20 out of 993)	0.5% (25 out of 4437)	44.4% (20 out of 45)
£30,001 to £40,000	22.4% (223 out of 993)	9.6% (427 out of 4437)	34.3% (223 out of 650)
£40,001 to £50,000	67.4% (670 out of 993)	75.8% (3366 out of 4437)	16.6% (670 out of 4036)
£50,001 to £60,000	3.9% (39 out of 993)	6.5% (292 out of 4437)	11.5% (39 out of 331)
£60,001 to £70,000	2.1% (21 out of 993)	3.1% (141 out of 4437)	12.9% (21 out of 162)

£70,001 to £80,000	1.3% (13 out of 993)	2.3% (105 out of 4437)	12.3% (13 out of 105)
> £80,000	0.7% (7 out of 993)	1.8% (81 out of 4437)	8.6% (7 out of 81)

Figure 17

5.12 Ethnicity pay gap – across our staff groups

The graphs below (figures 18 and 19) show the median and mean gender pay gaps for ethnically underrepresented groups. They are helpful to identify trends in pay across the past five years.

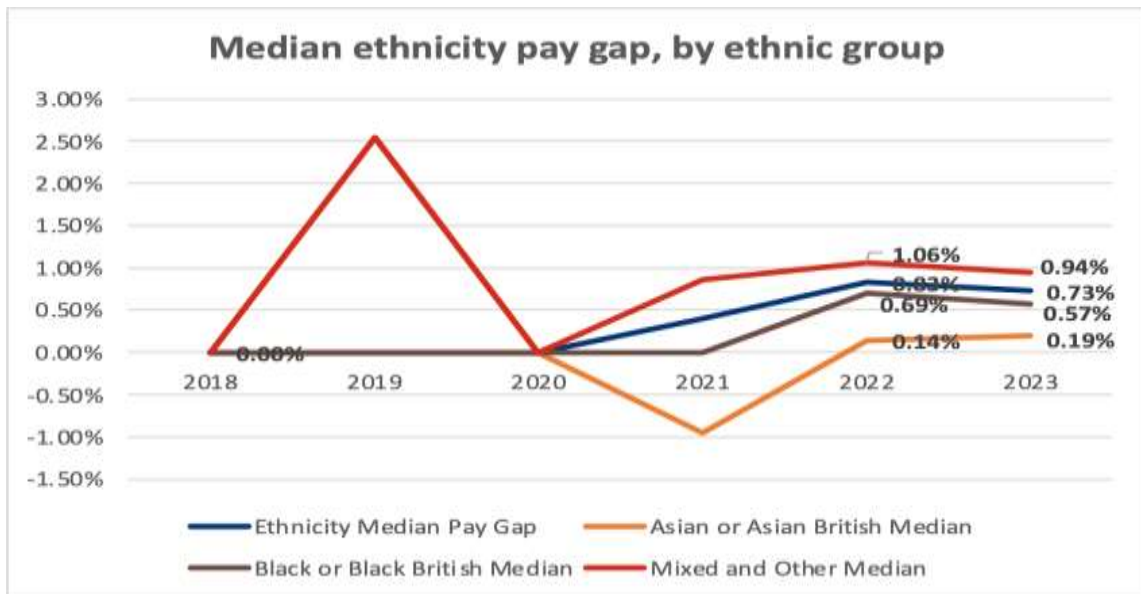


Figure 18

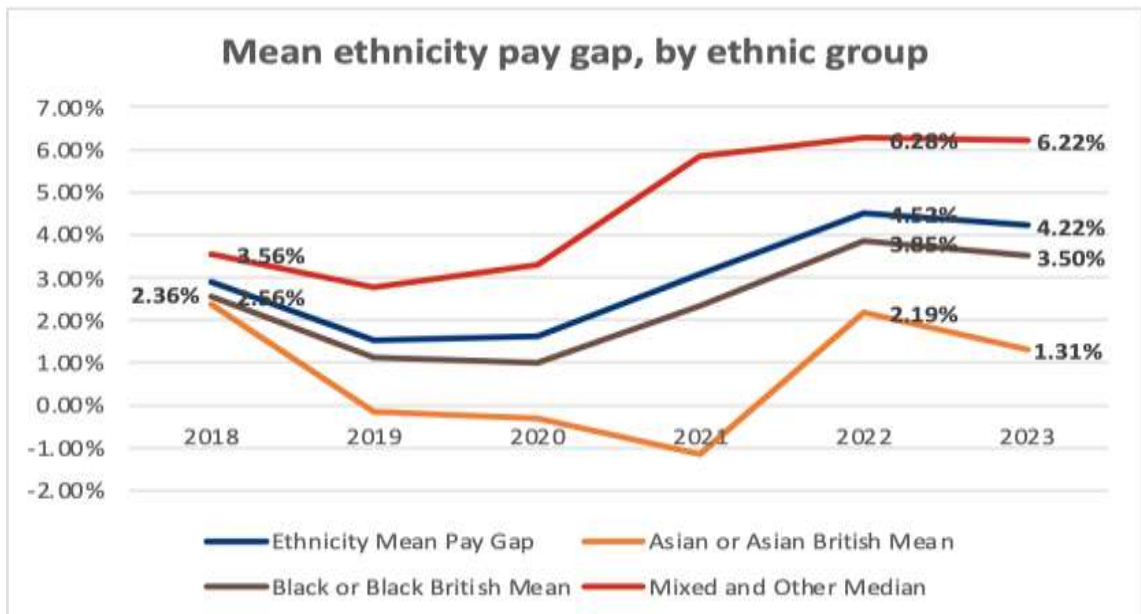


Figure 19

5.13 As of 31 March 2023, the median ethnicity pay gap was 0.73%, down by 0.1% compared to last year (0.83%), and the mean gap was 4.22%, down by 0.3% from the previous year (4.52%).

5.14 This indicates that the average hourly rate of pay for staff belonging to ethnically underrepresented groups across LFB is less than the average hourly rate of pay for White staff. There has been very little change in this position year on year.

5.15 The highest ethnicity pay gap is observed among Mixed and Other staff, while the smallest is among Asian or Asian British staff. This group now has a median pay gap of 0.19%, which reflects an increase of 0.05% from 2022. Moreover, it has also risen since 2018, as well as in the past year.

5.16 The table below (figure 20) shows the distribution of staff across Operational roles where 5.5% of White staff (205 out of 3725) are recorded at the rank of Station Commander and above, versus 2.5% of ethnically underrepresented staff (18 out of 699). This could be driven by historical factors related to the length of service, lack of targeted recruitment and/or development of underrepresented ethnic staff.

Operational Staff	Ethnically Under-represented Group	White	All staff
Group Commander and Above	1.57% (11 out of 699)	2.25% (84 out of 3,725)	95
Station Commander	1.00% (7 out of 699)	3.24% (121 out of 3,725)	128
Station Officer	2.86% (20 out of 699)	6.60% (246 out of 3,725)	266
Sub Officer	9.58% (67 out of 699)	9.82% (366 out of 3,725)	433
Leading Firefighter	8.29% (58 out of 699)	10.95% (408 out of 3,725)	466
Firefighter	74.82% (523 out of 699)	66.04% (2460 out of 3,725)	2,983
Trainee Firefighter	1.85% (13 out of 699)	1.07% (40 out of 3,725)	53
All Operational Staff	699	3,725	4,424

Figure 20

5.17 For our Operational roles there is a median pay gap of 0.58%, and a mean of 4.95%. This indicates that, on average, our staff from ethnically underrepresented groups earn less than White counterparts.

5.18 Due to our pay structure, the median calculation for Operational roles is unlikely to show much difference in the pay gap due to the heavily clustered distribution of salary amongst operational staff.

5.19 The table below (figure 21) presents these findings slightly differently in terms of salaries, to allow us to further identify where there may be an over or under representation in pay and thus disparities for our staff from ethnically underrepresented groups. To do so we have broken down the salaries into £10,000 increments up to £100,000 with those earning more than £100,000 placed into a single group. The majority of staff in Operations from ethnically underrepresented groups are in roles that attract salaries below £50,000.

Operational Staff			
Salary	Ethnically underrepresented groups	White	Total staff
<=£20,000	All Operational roles at LFB attract salaries above £30,000		
£20,001 to £30,000			
£30,001 to £40,000	12.87% (90 out of 699)	4.93% (184 out of 3,725)	274
£40,001 to £50,000	81.54% (570 out of 699)	83.94% (3127 out of 3,725)	3697
£50,001 to £60,000	3.14% (22 out of 699)	5.71% (213 out of 3,725)	235
£60,001 to £70,000	1.00% (7 out of 699)	2.38% (89 out of 3,725)	96
> £70,001	1.43% (10 out of 699)	3.01% (112 out of 3,725)	122

Figure 21

5.20 When broken down further our analysis shows that the pay gap is greatest among Black or Black British staff in Operational roles, where the overall median pay gap is 0.58%, and the mean pay gap 5.08%. For Operational staff identifying as Other Ethnic Group (Mixed) with the overall median pay gap of 0.66% and a mean pay gap of 5.03%. The figures for Asian or Asian British Operational staff show an overall median pay gap at 0.35% and mean pay gap of 4.40%.

5.21 For our Control roles there is a median pay gap of 5.40%, and a mean of 8.16%, with staff from ethnically underrepresented groups in Control earning a mean hourly salary of £1.83 less than White counterparts.

Control Rank / Grade	Ethnically Underrepresented staff	White	Total
Operations Manager and above	Nil	7.86% (7 out of 89)	6.36% (7 out of 110)
Assistant Operations Manager	26.31% (5 out of 19)	25.84% (23 out of 89)	25.45% (28 out of 110)
Control Room Officer	73.68% (14 out of 19)	66.29% (59 out of 89)	67.27% (74 out of 110)
Total	19 (100%)	89 (100%)	110 (100%)

Figure 22

5.22 Again, as above we have presented the findings slightly differently in the table below (figure 22a) in terms of the salaries to allow us to further identify where there may be an over or under representation in pay and thus disparities for our staff from ethnically underrepresented groups. Due to the lower number of staff in Control (110), overall, there are gaps across the different bands with far fewer numbers of staff across the top. However, unlike elsewhere, we see that proportionately there are a higher number of staff from ethnically underrepresented groups (5.57%, 39 out of 699) earning above £50,000.

Control Staff

Salary	Ethnically underrepresented groups	White	All staff
<=£20,000	All Control roles at LFB attract salaries above £30,000		
£20,001 to £30,000			
£30,001 to £40,000	47.36% (9 out of 19)	36.36% (32 out of 88)	42
> £40,001	52.63% (10 out of 19)	63.64% (58 out of 88)	68
Total	19 (17.75%)	88 (82.24%)	110

Figure 22a

5.23 For our FRS roles there is a median pay gap of 11.76%, and a mean of 12.90%, with staff from ethnically underrepresented groups earning a mean hourly salary of £3.42 less than White staff.

5.24 Of our FRS staff, our senior grades at FRS F and above are made up of the following groups:

- 25.16% (157 out of 624), staff from White backgrounds
- 11.27% (15 out of 133), staff from Black or Black British backgrounds; and,
- 9.45% (7 out of 74), staff from Asian or Asian British.

FRS Grade	Ethnically Underrepresented staff	White	Total number of posts	% of ethnically underrepresented staff at each grade
TMG U and above	1.09% (3 out of 275)	3.36% (21 out of 624)	2.53% (24 out of 946)	12.5% 87.5% (White)
FRS G	2.90% (8 out of 275)	7.21% (45 out of 624)	5.60% (53 out of 946)	12.90% 72.58% (White)
FRS F	6.90% (19 out of 275)	14.58% (91 out of 624)	11.62% (110 out of 946)	17.27% 82.72% (White)
FRS E	41 (41 out of 275)	16.02% (100 out of 624)	14.90% (141 out of 946)	29.07% 70.92% (White)
FRS D	14.90% (66 out of 275)	24.51% (153 out of 624)	23.15% (219 out of 946)	30.13% 69.86% (White)
FRS C/D	1.09% (3 out of 275)	0.32% (2 out of 624)	0.52% (5 out of 946)	60% 40% (White)
FRS C	24.72% (68 out of 275)	19.21% (120 out of 624)	19.87% (188 out of 946)	36.17% 63.82% (White)
FRS B/C	0.72% (2 out of 275)	4.0% (25 out of 624)	2.85% (27 out of 946)	7.40% 92.59% (White)
FRS B	24% (66 out of 275)	11.21% (70 out of 624)	14.37% (136 out of 946)	48.52% 59.47% (White)
Total	275	624	946	29.06% 65.96% (White)

%	29.06%	65.96%	100%	
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Figure 23

5.25 Again, as above we have presented the findings slightly differently in the table below (figure 23a) in terms of the salaries to allow us to further identify where there may be an over or under representation in pay and thus disparities for our staff from ethnically underrepresented groups. It indicates that 30.5% (275 of 899) of all FRS staff are from ethnically underrepresented groups and are disproportionately represented (245 of 275) across the lower grades, FRS E and below. This significantly impacts the pay gap as only 11% (30 out of 275) of senior positions, grades FRS F, and above are held by staff from ethnically underrepresented groups which contrasts with their White peers who are more likely to hold these roles.

FRS Staff			
Salary	Ethnically Underrepresented Groups	White	Total
<=£20,000	All roles at LFB attract salaries above £20,000		
£20,001 to £30,000	7.27% (20 out of 275)	4.00% (25 out of 624)	45
£30,001 to £40,000	45.09% (124 out of 275)	33.81% (211 out of 624)	335
£40,001 to £50,000	33.81% (93 out of 275)	32.05% (200 out of 624)	293
£50,001 to £60,000	5.09% (14 out of 275)	10.41% (65 out of 624)	79
£60,001 to £70,000	5.09% (14 out of 275)	8.33% (52 out of 624)	66
>£70,000	3.63% (10 out of 275)	11.37% (71 out of 624)	81

Figure 23a

5.26 When broken down further our analysis shows that the pay gap is greatest among Black or Black British staff in FRS roles, where the overall median pay gap is 11.76%, with a mean pay gap of 12.89%, indicating that this staff group, on average, earn less than their White peers. FRS staff identifying as Other Ethnic Group (Mixed) have an overall median pay gap of 11.76% and a mean pay gap of 14.20%. Asian or Asian British FRS staff have an overall median pay gap of 0.19% and mean pay gap of 1.31%.

5.27 In summary, overall, our analysis shows that there has been a reduction in both median and mean ethnicity pay gaps, indicating positive trends. However, challenges persist, especially in higher salary levels. Ongoing efforts are in place to address these gaps. Disparities are evident in higher-ranking positions in Operational roles, with a notable pay gap among Black or Black British staff. In Control roles, an overall pay gap exists, with ethnically underrepresented groups earning less than White counterparts.

6. Disability

6.1 At LFB, currently staff self-declare whether they consider themselves to have a disability and are not required to provide any further information about the nature of their disability nor whether it is physical, psychological or cognitive. In this report, the disability pay gap is calculated by comparing the overall pay of staff with disabilities against staff without.

6.2 Our HR data indicates there are 482 (8.47%) staff working across the organisation who have declared a disability. This is further broken down across our three staff groups as follows:

- 4630 Operational: 346 (7.5%)
- 110 Control: 11 (10.0%)
- 946 FRS: 125 (13.2%)

6.3 According to Trust for London in in 2023, the working population in London comprised over 4.7 million individuals, accounting for 66.1% of the adult population. In contrast, the employment rate for people with disabilities in London stood at 46.5%, with approximately 370,000 Londoners with disabilities being unemployed. This indicates a significant "disability employment gap" of 38.5% points when compared to the overall employment rate in London, which was 85%.

6.4 In comparison, LFB has 482 staff with disabilities (out of 5686) and London has 370,000 (out of 4.7m), which shows the slight difference in favour of LFB 8.47% versus London 7.87%

6.5 It's important to note that there is considerable variation in employment rates among disabled individuals across different boroughs of London and among those with different types of disabilities. For instance, people with mental health problems, who constitute nearly a third of all disabled people in London, are most likely to be unemployed, with an employment gap of 47.5 percentage points for this group.

6.6 The table below (figure 24) shows that despite a slight decrease in disclosure rates, the number of staff with disabilities has slightly increased over the past year (from 2022) amongst LFB staff eligible for pay gap analysis.

	2022	2023
Disabled	442	474
Not Disabled	4998	4975
LFB staff eligible for pay gap analysis	5554	5632
Disclosure rate	5440 (97.9%)	5449 (96.8%)

Figure 24

6.7 Disability pay gap

A positive disability pay gap means that on average staff without disabilities earn more than staff who have declared a disability and a negative disability pay gap means that staff with disabilities on average earn more than those without.

6.8 As of 31 March 2023, as indicated in the table below (figure 25), across the organisation both the mean and median disability pay gaps have decreased. The figures show that the median disability pay gap is -0.78% having decreased by 0.76% from 2022, and the mean pay gap is -2.83%, having reduced by -0.20% compared to 2022 (-3.03%). This is slightly in favour of staff with disabilities. On the face of it, this suggests that, on average staff with and without disabilities are practically earning the same.

	Median			Mean		
	Median pay gap (2022)	Median pay gap (2023)	Median pay gap (% point change)	Mean pay gap (2022)	Mean pay gap (2023)	Mean pay gap (% point change)
Disability						
With disabilities vs without	-1.54%	-0.78%	+0.76%	-3.03%	-2.83%	+0.2%

Figure 25

6.9 To better show how the pay of our Disability pay gap is distributed, we divide the salaries of this group and our staff with and without disability into four equal groups (quartile 1 is the lowest pay and quartile 4 the highest) and then analyse how many staff from both sets are in each. As each quartile represents 25% of the workforce, it helps us to see whether there is a fair representation and thus a fair distribution of pay across each.

6.10 The result of this analysis is shown in the tables below (figure 26 and 27), where a positive pay gap for a quartile indicates staff without disability earn more, and negative numbers that staff with disability earn more.

Median Quartile	Without Disability			With Disability			Pay gap (%)
	Employees (%)	Hourly pay (£)	Employees (%)	Hourly pay (£)			
Quartile 1	1238	90.83%	£18.79	125	9.17%	£18.75	0.21%
Quartile 2	1268	93.08%	£19.30	94	6.92%	£19.27	0.15%
Quartile 3	1263	92.75%	£20.71	99	7.25%	£20.97	-1.25%
Quartile 4	1206	88.57%	£24.37	156	11.43%	£24.45	-0.32%

Figure 26

Mean Quartile	Without Disability			With Disability			Pay gap (%)
	Employees (%)	Hourly pay (£)	Employees (%)	Hourly pay (£)			
Quartile 1	1238	90.83%	£17.83	125	9.17%	£17.74	0.53%
Quartile 2	1268	93.08%	£19.31	94	6.92%	£19.29	0.09%

Quartile 3	1263	92.75%	£20.56	99	7.25%	£20.68	-0.59%
Quartile 4	1206	88.57%	£27.79	156	11.43%	£27.63	0.57%

Figure 27

6.11 To examine if and where any disparities in pay for staff with disabilities exist, we break our analysis down even further to identify where there may be an over or under representation in an area of pay. To do so we break down the salaries into £10,000 increments up to £100,000 with those earning more than £100,000 placed into a single group.

6.12 This is shown in the table below (Figure 28) which illustrates the proportion of roles across the organisation, within each pay band, that are held by staff with disabilities. It indicates that in the pay range of £20,001 to £30,000, about 10% of employees have disabilities, and in the £90,001 to £100,000 pay range, a quarter of the staff have disabilities, which is higher than the 12% representation of disabled individuals in London's working-age population.

Payband	2022	2023
<=£20,000	All roles at LFB attract salaries above £20,000	
£20,001 to £30,000	8.3%	10.0%
£30,001 to £40,000	7.8%	14.6%
£40,001 to £50,000	7.9%	8.0%
£50,001 to £60,000	12.8%	15.5%
£60,001 to £70,000	8.5%	11.9%
£70,001 to £80,000	14.1%	14.4%
£80,001 to £90,000	6.9%	15.6%
£90,001 to £100,000	25.0%	25.0%
£100,001 >	5.3%	0.0%

Figure 28

6.13 **Disability pay gap – across our staff groups as follows:**

- The overall median pay gap for **Operational staff with disabilities** is 0.07%, with a mean pay gap of -2.64%.
- The overall median pay gap for **Control staff with disabilities** is -6.72%, with a mean pay gap of -5.58%.
- The overall median pay gap for **FRS staff with disabilities** is 3.45%, with a mean pay gap of 5.73%.

Operational Staff	Disability	No Disability	All staff	% of staff with disabilities at each grade
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Group Commander And above	3.84% (13 out of 338)	1.5% (82 out of 4,111)	1.99% (95 out of 4,449)	13.68% (disabilities) 86.31% (non-disabilities)
Station Commander	5.3% (18 out of 338)	2.7% (110 out of 4,111)	2.87% (128 out of 4,449)	14.06% (disabilities) 85.93% (non-disabilities)
Station Officer	8.9% (30 out of 338)	5.8% (240 out of 4,111)	6.06% (270 out of 4,449)	11.11% (disabilities) 88.88% (non-disabilities)
Sub Officer	8.6% (29 out of 338)	9.9% (408 out of 4,111)	9.82% (437 out of 4,449)	6.63% (disabilities) 93.36% (non-disabilities)
Leading Firefighter	9.5% (32 out of 338)	10.6% (437 out of 4,111)	10.54% (469 out of 4,449)	7.12% (disabilities) 97.32% (non-disabilities)
Firefighter	62.1% (210 out of 338)	67.8% (2787 out of 4,111)	67.36% (2,997 out of 4,449)	7% (disabilities) 92.99% (non-disabilities)
Trainee Firefighter	1.8% (6 out of 338)	1.1% (47 out of 4,111)	1.19% (53 out of 4,449)	11.32% (disabilities) 88.67% (non-disabilities)
All Operational Staff	(338)	(4,111)	(4,449)	7.59% (disabilities) 92.40% (non-disabilities)

Figure 29

FRS Staff	Disability	No Disability	All staff	% of staff with disabilities at each grade
TMG and above	0.8% (1 out of 125)	0.1% (21 out of 767)	2.73% (22 out of 946)	4.54% (disabilities) 95.45% (non-disabilities)
FRS G	4.8% (6 out of 125)	6.1% (47 out of 767)	5.60% (53 out of 946)	11.32% (disabilities) 88.67% (non-disabilities)
FRS F	8.8% (11 out of 125)	12.6% (97 out of 767)	11.41% (108 out of 946)	10.18% (disabilities) 9.81% (non-disabilities)
FRS E	13.6% (17 out of 125)	16.4% (126 out of 767)	13% (143 out of 946)	11.88% (disabilities) 88.11% (non-disabilities)
FRS D	24.8% (31 out of 125)	23.3% (179 out of 767)	22.19% (210 out of 946)	14.71% (disabilities) 85.23% (non-disabilities)
FRS C/D	0.8% (1 out of 125)	0.5% (4 out of 767)	5.60% (5 out of 946)	20% (disabilities) 80% (non-disabilities)
FRS C	24.8% (31 out of 125)	20.6% (158 out of 767)	19.97% (189 out of 946)	16.40% (disabilities) 83.59% (non-disabilities)
FRS B/C	3.2% (4 out of 125)	3.0% (23 out of 767)	2.85% (27 out of 946)	7.40% (disabilities) 85.18% (non-disabilities)
FRS B	18.4% (23 out of 125)	14.6% (112 out of 767)	14.27% (135 out of 946)	17.03% (disabilities) 82.96% (non-disabilities)
All FRS Staff	125	767	946	12.96% (disabilities) 79.56% (non-disabilities)

Figure 30

Control Staff	Disability	No Disability	All staff	% of staff with disabilities at each grade
Assistant Operations Manager and above	45.5% (5 out of 11)	26.80% (26 out of 97)	28.18% (31 out of 110)	16.12% (disabilities) 83.87% (non-disabilities)
Control Room Officer	36.4% (4 out of 11)	70.1% (68 out of 97)	65.45% (72 out of 110)	5.55% (disabilities) 94.44% (non-disabilities)
All Control Staff	11	97	110	10% (disabilities) 88.18% (non-disabilities)

Figure 31

6.14 In summary, our analysis shows that the salary for staff both with and without disabilities is similar and becoming closer each year. The analysis of pay distribution and detailed pay bands offers insights into the nuances of pay equity, showcasing both areas of fairness and disparities among staff with and without disabilities. The breakdown by staff groups provides a closer look at pay gaps in specific operational areas. Continuous efforts are crucial to address these gaps and uphold a fair pay distribution, fostering inclusivity and equity in the workplace. As of March 31, 2023, improvements in reducing the disability pay gap are notable, with staff with disabilities earning slightly more in certain quartiles. However, challenges remain, especially in roles exceeding £100,000, emphasizing the ongoing need for equitable practices.

7. Intersectional and other analysis

7.1 In completing our report, we have also undertaken intersectionality analysis which examines whether staff experience additional disadvantage if they hold more than one protected characteristic.

7.2 Following intersectional analysis of gender and ethnicity, we can conclude that there are notable disparities between women from different ethnic backgrounds across our staff groups.

7.3 Asian/Asian British women in Operational roles have the most pronounced pay gap at LFB with a median difference of 22.98% from their White counterparts. It should be noted that the mean is 3.06% in favour of Asian/Asian British women, and this disparity is likely due to the fewer than ten Asian/Asian British women in Operational roles.

7.4 While not as large as in Operations, we found that the pay gap for Asian/Asian British women in FRS roles is slightly bigger than any other ethnicity, with a median of 0.88%, and a mean of 11.20% when compared to their White counterparts.

7.5 The pay gap between Black or Black British women compared to White women in Operational roles is slight, with the median pay gap at 0.14% and the mean at -0.83%, as shown in the table below (figure 20). However, it should be noted that out of 4580 Operational staff, and 465 Operational women, there are only 19 women from a Black/Black British background.

7.6 For men, our analysis showed a slight pay gap (+0.74% and +5.74%) between men from ethnically underrepresented groups and their White counterparts.

7.7 The pay gap between men in Operational roles identifying as Black/Black British and White men shows a median of 0.74% and mean of 5.74%. The pay gap widens significantly for men from a Black/Black British background in FRS roles where the median pay gap is 12.66% and the mean increases to 21.8%, signifying that this group earns approximately £3.08 less per hour on average than their White peers, see tables below (figure 32 and figure 33).

	Median Pay Gap (Female)	Mean Pay Gap (Female)	Median Pay Gap (Male)	Mean Pay Gap (Male)
Black or Black British Hourly Pay	£19.17	£19.56	£19.33	£19.65
White Hourly Pay	£19.20	£19.40	£19.47	£20.85
Pay Gap (Operational)	0.14%	-0.83%	0.74%	5.74%

Figure 32

	Median Pay Gap (Female)	Mean Pay Gap (Female)	Median Pay Gap (Male)	Mean Pay Gap (Male)
Black or Black British Hourly Pay	£22.92	£24.09	£21.20	£21.35
White Hourly Pay	£23.79	£25.71	£24.28	£27.30
Pay Gap (FRS)	3.63%	6.32%	12.66%	21.80%

Figure 33

7.8 Additionally, there is a similar outcome for men from mixed and other ethnic backgrounds working in FRS who also see more pronounced pay disparities with a median pay gap of 15.64% and mean pay gap of 20.80%, which translates to a difference of £3.80 in median and £5.68 in pay, which is also true for this group in Control roles.

7.9 For Asian/Asian British men in Operational roles there is a much smaller pay gap with a median pay gap of 0.49%, and a mean pay gap of 5.17%. This is in contrast to Asian/Asian British men in FRS roles, with both a median and mean pay gap of just under 12% (11.8% and 11.7% respectively) highlighting a disparity in earnings to their White peers.

7.10 Our intersectional analysis of both gender and disability, and ethnicity and disability did not reveal any significant disparities in pay gap.

7.11 We completed additional analysis to identify any potential pay gaps for our staff who work on a part-time basis and found that, as shown in the chart below (figure 34), despite spikes/dips in 2020, the pay gap for both full-time and part-time staff are broadly similar to what they were in 2018.

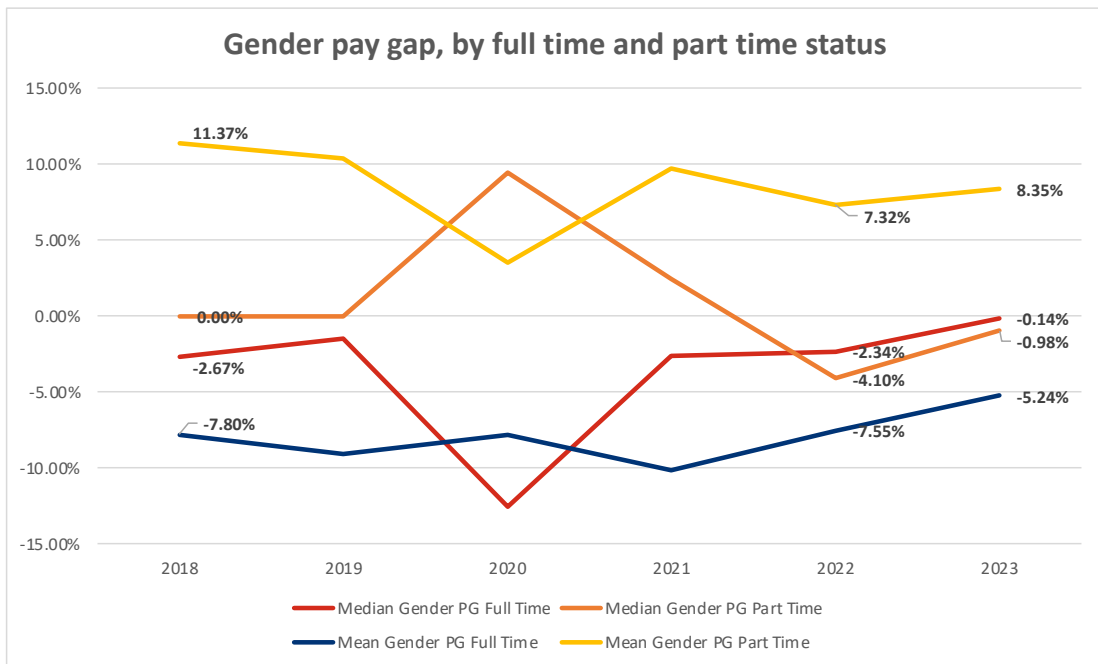


Figure 34

7.12 Further analysis showed that overall, women working part time earn on average 8.35% less than their male counterparts. However, it should be noted that the median gender pay gap for part-time staff has seen a shift from -4.10% in 2022 to -0.98% in 2023, while the mean pay gap slightly increased from 7.3% in 2022 to 8.35% in 2023.

7.13 Overall, staff from ethnically underrepresented groups working part time earn on average 10% less than their White counterparts. However, it should be noted that the median ethnicity pay gap for part-time staff has seen an increase from -0.16% in 2022 to 0.94% in 2023, while the mean pay gap slightly decreased from 10.92% in 2022 to 9.74% in 2023.

7.14 Overall, staff with disabilities working part time earn on average 4.87% less than their counterparts without disabilities. However, it should be noted that the median disability pay gap for part-time staff has seen a decrease from 9.05% in 2022 to 2.94% in 2023, while the mean pay gap saw a significant reduction, decreasing from 10.08% in 2022 to 4.87% in 2023.

8. Conclusion

8.1 Our pay gaps compare favourably to both the national (UK) and London picture. According to the Office for National Statistics (ONS), the national median gender pay gap for all workers in 2022 was 14.9% and the mean gender pay gap was 13.90%. The median gender pay gap for workers in London in 2022 was 13% and the mean gender pay gap was 18.10%. www.ons.gov.uk

8.2 At LFB the differences in pay between men and women are generally small and in show a higher median hourly salary for women and staff with disabilities.

8.3 Overall, the pay gap median is -0.4% and the mean is -5.07% in favour of women.

However, although the pay gap figures may seem favourable to women, we have highlighted in the report that the methodology used to calculate pay gaps can at times mask the fact that there is an underrepresentation of women across the organisation, and particularly in senior roles.

8.4 Overall, the ethnicity median pay gap is 0.73% and the mean pay gap is 4.22%. We have highlighted in the report that the methodology used to calculate pay gaps can at times mask the fact that there is an underrepresentation of staff from Black, Asian and Other underrepresent ethnic groups across the organisation, and particularly in senior roles.

8.5 Overall, the disability median pay gap is -0.78% and the mean disability pay gap is -2.83%. However, although the pay gap figures may seem favourable to staff with disabilities, we have highlighted in the report that the methodology used to calculate pay gaps can at times mask the fact that there is an underrepresentation of this group in senior roles.

8.6 Addressing any pay gap at LFB is not a simple issue, as they can be caused by different reasons and more often are due to gender, ethnicity and disability under-representation in senior positions than any pay inequity.

9. Equality Comments

9.1 The LFC and the Deputy Mayor for Fire and Resilience are required to have due regard to the Public Sector Equality Duty (section 149 of the Equality Act 2010) when taking decisions. This in broad terms involves understanding the potential impact of policy and decisions on different people, taking this into account and then evidencing how decisions were reached.

9.2 It is important to note that consideration of the Public Sector Equality Duty is not a one-off task. The duty must be fulfilled before taking a decision, at the time of taking a decision, and after the decision has been taken.

9.3 The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, marriage, and civil partnership (but only in respect of the requirements to have due regard to the need to eliminate discrimination), race (ethnic or national origins, colour or nationality), religion or belief (including lack of belief), sex, and sexual orientation.

9.4 The Public Sector Equality Duty requires decision-takers in the exercise of all their functions, to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and other prohibited conduct.
- Advance equality of opportunity between people who share a relevant protected characteristic and persons who do not share it.
- Foster good relations between people who share a relevant protected characteristic and persons who do not share it.

9.5 Having due regard to the need to advance equality of opportunity between persons who

share a relevant protected characteristic and persons who do not share it involves having due regard to the need to:

- Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic where those disadvantages are connected to that characteristic.
- Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it.
- Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

9.6 The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.

9.7 Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:

- Tackle prejudice
- Promote understanding.

9.8 At Appendix 1, you can find our Pay Gap Action Plan for Ethnicity, Disability and Gender. This action plan comprises work that will address the pay gaps but most importantly, the culture within the LFB, taking into account recommendations from the HMI report and the recommendations from the Jaden Francois-Esprit inquiry. The LFB will continue to monitor our progress against the action plans and provide annual updates accordingly. Our pay gap report and action plan support delivery against the Mayor's vision of a fair and equal city and corresponding Diversity and Inclusion Action Standard.

10. Other considerations

10.1 Workforce comments

The report author should consider any workforce issues which may/will arise as a consequence of the implementation of the report's recommendations. For example, resource implications or consultation with representative bodies.

10.2 Sustainability comments

The report does not contain any issues that would need to be considered by the Sustainable Development team.

10.3 Procurement comments

The report does not contain any business cases so there are no procurement implications.

10.4 Communications comments

The report does not recommend any policy be created or amended. All activities and workstreams commented upon have individual leads who should be liaising with the communications teams to develop appropriate engagement plans.

10.5 Financial comments

The report does not commit the organization to any new activity and simply comments existing workstreams that have already been agreed.

10.6 Legal comments

The report refers to a combined Ethnicity, Disability and Gender pay report. The report, with Appendix 1, is presented for information only. Therefore, no direct legal implications arise.

10.7 Under section 9 of the Policing and Crime Act 2017, the London Fire Commissioner (the "Commissioner") is established as a corporation sole with the Mayor appointing the occupant of that office. The London Fire Commissioner must secure that the London Fire and Rescue Service is efficient and effective. The London Fire and Rescue Service means the personnel, services and equipment secured by the London Fire Commissioner for the purposes of the carrying out the Commissioners functions. The Mayor must hold the London Fire Commissioner to account for the exercise of the Commissioner's functions.

10.8 The London Fire Commissioner ('LFC') is a 'relevant public authority' for the purposes of the Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017 (schedule 2 to the Regulations). Regulation 3 and Schedule 1 of the 2017 Regulations set out the obligations on public authorities to publish certain information such as gender pay gap relating to employees.

10.9 There is no statutory obligation to publish ethnicity or disability pay gap information, but this is good practice, particularly in demonstrating how the LFC meets the Public Sector Equality Duty to advance equality of opportunity. The LFC may collate and publish this information towards that end under the general powers contained in section 5A Fire and Rescue Services Act 2004 (FRSA 2004) which empowers the LFC to do anything it considers appropriate for the purposes of the carrying out of any of its functions, or anything incidental or indirectly to its functional purposes through a number of moves.

10.10 Transparency and openness of reporting builds confidence, and ensures the Brigade seeks continuous improvement in its employment practices. This report demonstrates the Commissioners compliance under the Public Sector Equality duty, and the commitment to continually review the Brigades recruitment processes addressing areas through an action plan outlined in the report.

11. List of appendices

Appendix	Title	Open or confidential*
a.	Staff in each area per grade per gender, ethnicity, and disability.	Open
b.	LFB 2023 Pay gap Report - Action Plan	Open

(NB: LFB is not expected to attach a separate report for ethnicity, gender, and disability, like TLF)

Appendix a

The table below shows the numbers of staff in each area per grade per gender, ethnicity, and disability.

All LFB staff	2019-2020		2020-2021		2021-2022		2022-2023	
Total men in LFB	4855		4839		4611		4647	
Total women LFB	914		982		989		1039	
Operation	Men	Women	Men	Women	Men	Women	Men	Women
Gender	4350	366	4340	416	4085	423	4115	465
Ethnicity/Operation	Men	Women	Men	Women	Men	Women	Men	Women
White	3701	326	3622	367	3371	366	3330	395
Black or Black British	227	16	253	14	246	17	251	19
Asian or Asian British	100	2	100	2	100	4	99	6
Mixed or Other Ethnicity	261	21	278	26	278	27	293	31
High Positions (SC and above)	Men	Women	Men	Women	Men	Women	Men	Women
Total high position in Ops	236	17	222	18	224	18	213	16
White	211	13	200	14	204	14	193	12
Black or Black British	9	1	8	1	7	1	7	1
Asian or Asian British	2	1	0	1	0	1	1	1
Mixed or other ethnicities	10	2	9	2	9	2	7	1
FRS	Men	Women	Men	Women	Men	Women	Men	Women
Gender	427	440	436	460	461	473	463	479
Ethnicity	Men	Women	Men	Women	Men	Women	Men	Women
White	332	271	326	281	337	288	326	298
Black or Black British	43	85	44	84	46	87	47	86
Asian or Asian British	24	38	29	39	32	40	35	39
Mixed or Other Ethnicity	21	38	22	40	26	43	28	40
High Positions (FRS F and above)	Men	Women	Men	Women	Men	Women	Men	Women
Total high position in FRS	85	77	99	91	97	92	101	94

Appendix b

LFB Action Plan: Gender, ethnicity and disability pay gap

It has become clear to us that improving pay gaps goes beyond simply looking at pay and this action plan seeks to address the root causes in order to tackle disparities in pay across sub-groups and improve the employee experience across the whole organisation. In this action plan we will do this by improving our gathering and analysis of staff data, strengthening our understanding and improvement of our culture and also through embedding equality, diversity and inclusion across the organisation. As our knowledge and maturity in relation to reasons for the pay gaps improve, so too will the quality and outcomes of our actions.

Following the completion of the independent review into the culture of LFB in November 2022, the organisation is reviewing its process policies and practices to make sure any potential biases that can result in disparities in outcomes for different staff groups are eliminated. This is a big programme of work with multiple interdependencies, and as such it is still going through various assurance and approvals mechanisms. Therefore, while specific dates of deliverables cannot be published at this time, we will work to complete the following activities and publish a detailed action plan with an update of progress in our next pay gap report (2024).

Improving how we collect and use information about our staff

Gain better understanding of the information we hold about our staff and meaningful insights from it we must learn to use organisational data in a more sophisticated and intelligent way; and also teach others of the important role it plays in driving improvements for all staff.

1. Improve our disclosure rates

- While our disclosure rates for each protected characteristic group remains high at above 95%, our data shows that the declaration rates on both ethnicity and disability are the lowest they've been in three years indicating that more people are choosing not to disclose these areas of their identity with the organisation. This can be for several reasons however, we must ensure that staff understand the reasons why they are asked to provide this information and must feel safe doing so. Alongside publishing communications about the importance of disclosing, we are undertaking the following activities:

- As described in the main body of the report, LFB currently collects data on gender using the binary terms male and female. We acknowledge that some colleagues may identify beyond this framework, recognising that sex and gender are not synonymous for everyone. We will therefore be monitoring gender data in the next year by including the category of non-binary too.
- In addition, our Inclusion team have worked with staff across the organisation to update our current categories for ethnic identities and have proposed a new set of monitoring questions to our Data team which differentiate more ethnicities for employees to choose from.
- In 2024, we are also introducing a new HR system which will allow staff to disclose further information about any disabilities which, we do not currently ask for.

2. Complete data training

- Member of the inclusion team who are non-data specialists will be provided with training to help them to better interrogate and report on data. This is required to enable the team to fully understand and analyse our pay gap data by identify patterns and trends across protected characteristics, roles, department and service areas.

3. Introduce an inclusion dashboard

- The inclusion team will be building a data dashboard that covers the employee lifecycle to identify disparities and gain insights into the employee experience of different staff groups. Even though excluded from the pay gap analysis, it will also include information about our agency and voluntary staff.
- It is hoped the inclusion dashboard will provide useful insights into the specific issues that are affecting the different sub-groups identified in the pay gap report (2023), which should enable us to provide a deeper analysis in our subsequent reports.

Understanding and improving our culture

Institutional inequality describes those that arise from the failures in processes and practices within an organisation. These inequalities are often insidious, unseen and are the fabric of the culture of an organisation, which can often differ from the day-to-day interpersonal overt experiences between staff. They will often present as advantages, privileges and power which a certain group will consistently and continuously benefit from, most of the time without them realising.

1. Introduce an inclusion competency framework

- As public sector workers, all LFB staff are bound by the Public Sector Equality Duty (PSED) which requires us all to consider how we can improve society and promote equality in every aspect of our day-to-day business, no matter what our role is.
- To help staff to understand what is required of them under the Duty and support them to work better together and also with others, we will be introducing a comprehensive competency framework that will include clear learning pathways and training for all staff across the organisation, from our directors to our trainee firefighter, including mandatory CBT packages about legislation and compliance. This will also include reviewing our current leadership and training programmes to ensure equality, diversity and inclusion (EDI) content is embedded throughout and that any existing content aligns to the new framework.

2. Improve our recruitment practices

- We will continue to use, and educate our staff about, positive action (which we are renaming to 'Equity Action') and introduce targeted recruitment into senior roles where representation remains extremely low. Our staff composition equality-based performance measures must be about more than just ticking boxes to get underrepresented staff into the organisation, and we must also ensure that we increase representation in our decision-making roles which are often at our more senior levels across the organisation. It is only then we will have true diversity not only in our numbers but also in our thinking.
- We will also be more consistent in using independent panel members in our recruitment and promotional processes, who can provide an extra layer of transparency, scrutiny and challenge to decisions and the overall process.

3. Improve our progression processes

- As highlighted in the LFB pay gap report (2023), while the overall gender, ethnicity and disability pay gaps remain narrow, deeper analysis has highlighted disparities between staff within the groups. This further supports the need to ensure that our equality-based performance measures are about more than just increasing representation and must also measure progression of targeted groups.
- We will do this through developing targeted development programmes for the groups of staff that have been identified as having the greatest disparity in pay. To be fully effective, these programmes must also be linked to robust workforce and succession plans across the organisation.
- To ensure we have the right people in the right places we will continue our EDI assessments which was embedded into the promotion process for all operational staff. We will strengthen this process by aligning it to our competency framework, so staff are clear of what is required of them.

Embedding equality, diversity and inclusion

The purpose of the PSED is to make sure that we, as a public organisation undertaking public functions, continuously and consistently give thought to how we can promote equality in everything that we do. This means we must be able to show that we actively consider and review equality in our decision-making, internal and external policies, procuring goods and services, the services we provide, and our recruitment, promotion and performance management of staff.

1. Introduce equality-based performance measures across the organisation

- To improve ownership and accountability of our specific duties under PSED, we will introduce explicit equality-based corporate performance measures across the following corporate areas, which should all be reflected in their strategies and reported against on an annual basis.

- Communications
- Community Engagement
- Estates
- Finance
- HR (including workforce and succession planning)
- Operations
- Procurement
- Property
- Recruitment (including Outreach and Promotions)

- Our recently introduced People Partners will work with Heads of Service to help to understand the challenges of their business areas, review diversity data and develop appropriate equality-based performance measures.

2. Complete a full review of pay across the organisation

- To specifically tackle pay gaps across the organisation, we will conduct a full review of our pay and rewards processes.