



LONDON FIRE BRIGADE

Report title

Gender Pay Gap Report and Action Plan

| | |
|----------------------|-------------------|
| Report to | Date |
| People Board | 23 September 2021 |
| Commissioner's Board | 06 October 2021 |

| | |
|-------------------------------------|---------------|
| Report by | Report number |
| Assistant Director, People Services | LFC-0603 |

Protective marking: **NOT PROTECTIVELY MARKED**

Publication status: Published in full

If redacting, give reason:

Executive Summary

This report is the 2019/2020 and 2020/2021 gender pay gap report to be submitted to the GLA for information prior to publication. The disability and ethnicity pay gap reports will be submitted to boards in due course as required by the GLA.

This gender pay gap report 20/21 also includes the previous year to reflect the period impacted by COVID-19 where the data suggests a marginal widening of the pay gap in some areas and therefore tells a more complete story. Our recruitment freeze has resulted in the cessation of outreach activity, and a reprioritisation of Togetherness Actions which are intended to bring more gender balance to our organisation; as the freeze has now been eased, it is likely there will be improvements made next year.

The Annual Survey of Hours and Earnings (ASHE) reports in 2020 that among full-time employees, the gender pay gap in April 2020 was 7.4%, down from 9.0% in April 2019. Whilst the data in this pay gap report suggests a positive pay gap in comparison to national data in favour of women specifically for our operational staff, further analysis reveals there is a lack of diversity at the base layer of our organisation, which is predominantly male in the largest of our staff groups which skews the data. The same is true of our control staff, where the largest staff group in the most junior roles are women, and therefore the measurement of the pay gap in both groups does not give a true indication of gender imbalance in the LFB. Although our pay gaps look favourable on the surface, in reality, the mean and median measurements do not reflect the experience of our staff in how gender disadvantage impacts the LFB.

Recommended decision

That Commissioner's Board gives prior approval for the Gender Pay Gap report and action plan for 2019/2020 and 2020/2021 before submission to the GLA.

Introduction and Background

1. This action plan reflects the changes in relation to the gender pay gap for the last two years to reflect the directed reporting periods. Ethnicity and disability pay gap reports will be produced as data is collated in due course and when directed. The London Fire Brigade demonstrated pay differentials in favour of women for median and mean pay rates, which has reduced slightly in the latter year.
2. This pay gap reverses when the data is broken down into part time rates, where there are pay differentials in favour of men, and across different staff groups (operational and non-operational). The following report sets out the data in full, and the actions LFB are undertaking to tackle the gender pay gap. In 2021, the pay gap has marginally widened; it is likely that the recruitment freeze as a result of COVID-19 and the review of organisational priorities has prevented further improvement of pay gaps as indicated by Equality Impact Assessments relating to decision making.

What is the mean and the median?

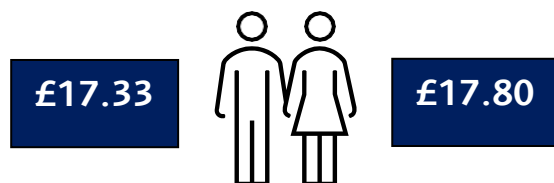
3. The mean measures the average pay for a woman against the average for a man.
4. The median compares the 'middle' pay for a woman with the 'middle' pay for a man when all values are distributed from low to high. The median is less affected by outliers than the mean. The LFC reports on both median and mean data in this report.

What is the difference between equal pay and gender pay gap?

5. Equal pay measures whether men and women are paid the same for performing work of equal value. Upholding equal pay is a legal requirement and we have robust processes in place to ensure we pay our people fairly, including job evaluation and a standardised approach to job grading and reward.
6. The gender pay gap is different. It measures the difference between the average pay for all men and women across the Brigade, regardless of their role or seniority. There is a gender pay gap in most organisations which has led to an average gender pay gap of 11.9% in the UK.

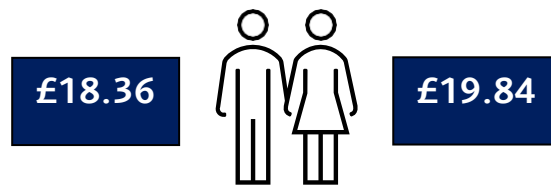
Summary of LFB Gender Pay Gap(s) - 2020

Median Hourly Pay: All Staff



7. *What this means:* LFB has a median pay gap of **-2.69%** in favour of **women**.

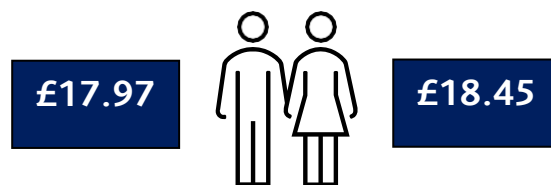
Mean Hourly Pay: All Staff



8. *What this means:* LFB has a mean pay gap of **-8.08%** in favour of **women**.

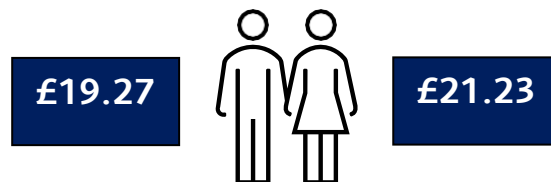
Summary of LFB Gender Pay Gap(s) - 2021

Median Hourly Pay: All Staff



9. *What this means:* LFB has a median pay gap of **-2.63%** in favour of **women**.

Mean Hourly Pay: All Staff



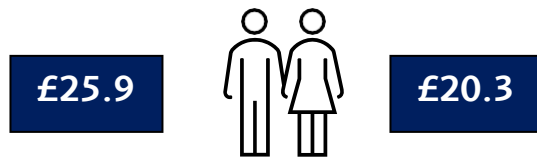
10. *What this means:* LFB has a mean pay gap of **-10.17%** in favour of **women**.

A note on staff groups, full and part time pay gaps

11. The reason the data shows pay gaps in favour of women is that mean hourly pay is lowest in the operational group which is predominantly male, and men therefore represent the bulk of the lower-ranked workforce.
12. On average, a UK company has a gender pay gap in favour of men of approximately 11.9%. Although the overall LFB pay gap therefore appears small, and in favour of women, there are significant differences in pay gaps when the data is broken down across different staff groups, and when broken down by full and part time staff. Two areas are highlighted below, and this report includes full details of all gaps, including some significant hourly pay gaps in favour of men.

Largest Pay Gap 2020:

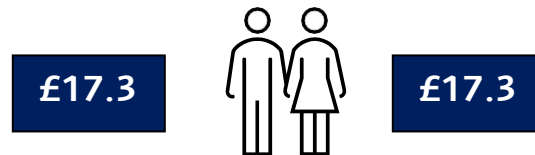
Median Part Time Hourly Pay: Control Staff Group



13. *What this means:* LFB has a median pay gap for part time Control staff of **21.66%** in favour of men.

Smallest Pay Gap:

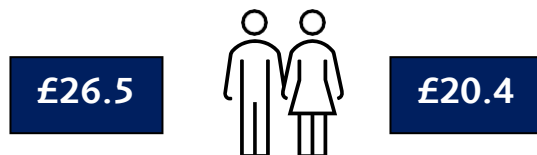
Median Full Time Hourly Pay: Operational Staff Group



14. *What this means:* LFB has **no** median pay gap for full time operational staff.

Largest Pay Gap 2021:

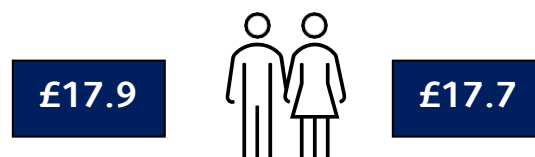
Median Part Time Hourly Pay: Control Staff Group



15. *What this means:* LFB has a median pay gap for part time Control staff of **22.70%** in favour of men.

Smallest Pay Gap:

Median Full Time Hourly Pay: Operational Staff Group



16. *What this means:* LFB has **only 1.07%** median pay gap in favour of **men** for full time operational staff.

COVID-19 Context

17. On 24 March 2020, the Equality and Human Rights Commission announced it would suspend enforcement action for organisations who do not report their gender pay gaps (in line with statutory requirements) for the 2018-19 year.

18. The Brigade's inclusion strategy, the 'Togetherness' Strategy which has been in place for just over a year, commits to publishing a disability pay gap report for 2021 as well as ethnicity and gender pay gap.

19. It should also be noted that the recruitment freeze and reprioritisation of the Togetherness Strategy action plan work as a result of COVID-19 is likely to have impacted positive change in gender pay gaps as identified in the related Equality Impact Assessment.

What about non-binary staff?

20. The LFC recognises that some people may have a gender identity which is gender fluid, or non-binary, and we are working with Stonewall (the national LGBT charity) to ensure our processes and policies do not discriminate against transgender or non-binary people. This is best practise. We acknowledge the nature of the gender pay gap report is to report against men and women and recognise that this limits the understanding of pay gaps in relation to some transgender people.

Full Pay Gap Analysis 2020

21. The London Fire Brigade (LFB) has published its gender pay gap information as at the 31 March 2020.

| All staff | Median Hourly Pay | | | | |
|-----------|-------------------|-----|-------------|------|---------|
| | Female | | Male | | Pay Gap |
| | Hourly Rate | No | Hourly Rate | No | |
| | £17.80 | 888 | £17.33 | 4801 | -2.69% |

| All staff | Mean Hourly Pay | | | | |
|-----------|-----------------|-----|-------------|------|---------|
| | Female | | Male | | Pay Gap |
| | Hourly Rate | No | Hourly Rate | No | |
| | £19.84 | 888 | £18.36 | 4801 | -8.08% |

| ALL STAFF: Full and Part Time Breakdown | Median Hourly Pay Rate (Full Time) | Median Hourly Pay Rate (Part Time) | Mean Hourly Pay Rate (Full Time) | Mean Hourly Pay Rate (Part Time) |
|---|------------------------------------|------------------------------------|----------------------------------|----------------------------------|
| Female | £19.50 | £20.22 | £19.76 | £20.65 |
| Male | £17.33 | £22.33 | £18.32 | £21.41 |
| Pay Gap | -12.53% | 9.45% | -7.84% | 3.53% |

22. The data has also been broken down by the three main occupational groups within the LFB:

- a) *Operational*: These are firefighters and operational managers. They make up 84% of the workforce. Their terms and conditions are negotiated nationally, and salaries are determined in accordance with role, with no reference to gender or any other personal characteristic.

| Operational | Median Hourly Pay Rate (Full Time) | Median Hourly Pay Rate (Part Time) | Mean Hourly Pay Rate (Full Time) | Mean Hourly Pay Rate (Part Time) |
|-------------|------------------------------------|------------------------------------|----------------------------------|----------------------------------|
| Female | £17.33 | £17.33 | £17.08 | £17.74 |
| Male | £17.33 | £17.33 | £17.86 | £17.47 |
| Pay Gap | 0.00% | -0.01% | 4.38% | -1.55% |

- b) *FRS (Fire and Rescue staff)*: These are non-uniformed support staff. They make up 14% of the workforce. Their terms and conditions are negotiated locally, and salaries are determined through a job evaluation system (Gauge), with no reference to gender or any other personal characteristic.

| FRS | Median Hourly Pay Rate (Full Time) | Median Hourly Pay Rate (Part Time) | Mean Hourly Pay Rate (Full Time) | Mean Hourly Pay Rate (Part Time) |
|---------|------------------------------------|------------------------------------|----------------------------------|----------------------------------|
| Female | £20.60 | £19.84 | £22.30 | £21.24 |
| Male | £21.63 | £22.33 | £23.36 | £23.62 |
| Pay Gap | 4.79% | 11.16% | 4.54% | 10.07% |

- c) *Control*: These are 999 call handlers and their managers. They make up 2% of the workforce. Their terms and conditions are negotiated locally, and salaries are determined in accordance with role, with no reference to gender or any other personal characteristic.

| Control | Median Hourly Pay Rate (Full Time) | Median Hourly Pay Rate (Part Time) | Mean Hourly Pay Rate (Full Time) | Mean Hourly Pay Rate (Part Time) |
|---------|------------------------------------|------------------------------------|----------------------------------|----------------------------------|
| Female | £19.00 | £20.36 | £19.38 | £21.14 |
| Male | £18.59 | £25.98 | £19.76 | £25.98 |
| Pay Gap | -2.23% | 21.66% | 1.92% | 18.66% |

2020 Findings

23. There is an overall **median** hourly pay gap **in favour of women of -2.69%**, which is a very small reduction in the gap reported in 2018/19 of -2.84%.
24. There is an overall **mean** hourly pay gap **in favour of women of -8.08%**, which is a very small reduction in the gap reported in 2018/19 of -8.44%.

Full Pay Gap Analysis 2021

25. The London Fire Brigade (LFB) has published its gender pay gap information as at the 20 July 2021.

| All staff | Median Hourly Pay | | | | Pay Gap |
|-----------|-------------------|-----|-------------|------|---------------|
| | Female | | Male | | |
| | Hourly Rate | No | Hourly Rate | No | |
| | £18.45 | 992 | £17.97 | 4794 | -2.63% |

| All staff | Mean Hourly Pay | | | | Pay Gap |
|-----------|-----------------|-----|-------------|------|----------------|
| | Female | | Male | | |
| | Hourly Rate | No | Hourly Rate | No | |
| | £21.23 | 992 | £19.27 | 4794 | -10.17% |

| ALL STAFF: Full and Part Time Breakdown | Median Hourly Pay Rate (Full Time) | Median Hourly Pay Rate (Part Time) | Mean Hourly Pay Rate (Full Time) | Mean Hourly Pay Rate (Part Time) |
|--|---|---|---|---|
| Female | £18.45 | £21.44 | £21.23 | £22.32 |
| Male | £17.97 | £21.97 | £19.27 | £24.73 |
| Pay Gap | -2.63% | 2.44% | -10.17% | 9.73% |

26. The data has also been broken down by the three main occupational groups within the LFB:

- a) *Operational*: These are firefighters and operational managers. They make up 82% of the workforce. Their terms and conditions are negotiated nationally, and salaries are determined in accordance with role, with no reference to gender or any other personal characteristic.

| Operational | Median Hourly Pay Rate (Full Time) | Median Hourly Pay Rate (Part Time) | Mean Hourly Pay Rate (Full Time) | Mean Hourly Pay Rate (Part Time) |
|--------------------|---|---|---|---|
| Female | £17.73 | £17.74 | £17.55 | £18.45 |
| Male | £17.92 | £18.06 | £18.64 | £18.18 |
| Pay Gap | 1.07% | 1.75% | 5.87% | -1.50% |

- b) *FRS (Fire and Rescue staff)*: These are non-uniformed support staff. They make up 16% of the workforce. Their terms and conditions are negotiated locally, and salaries are determined through a job evaluation system (Gauge), with no reference to gender or any other personal characteristic.

| FRS | Median Hourly Pay Rate (Full Time) | Median Hourly Pay Rate (Part Time) | Mean Hourly Pay Rate (Full Time) | Mean Hourly Pay Rate (Part Time) |
|----------------|---|---|---|---|
| Female | £23.02 | £22.70 | £25.05 | £23.41 |
| Male | £23.98 | £24.29 | £26.04 | £27.40 |
| Pay Gap | 4.01% | 6.57% | 3.83% | 14.53% |

- c) *Control*: These are 999 call handlers and their managers. They make up 2% of the workforce. Their terms and conditions are negotiated locally, and salaries are determined in accordance with role, with no reference to gender or any other personal characteristic.

| | Median Hourly Pay Rate (Full Time) | Median Hourly Pay Rate (Part Time) | Mean Hourly Pay Rate (Full Time) | Mean Hourly Pay Rate (Part Time) |
|----------------|---|---|---|---|
| Control | | | | |
| Female | £19.72 | £20.49 | £20.37 | £21.58 |
| Male | £19.98 | £26.50 | £21.00 | £26.50 |
| Pay Gap | 1.29% | 22.70% | 2.99% | 18.59% |

2021 Findings

27. There is an overall **median** hourly pay gap **in favour of women of -2.63%**, which is a very small -0.06% reduction in the gap reported in 2019/20.
28. There is an overall **mean** hourly pay gap **in favour of women of -10.17%**, which is a very small 2.09% increase in the gap reported in 2019/20.

Median hourly pay in 2020 and 2021

All Staff

29. As detailed above, in 2021 for median hourly pay for all staff, there is currently a small pay gap in favour of women of -2.63%. However, there are differences when broken down into full and part time median hourly pay.
30. There is a pay gap in favour of women for median hourly full time pay of -12.53% in 2020, which is an increase in gap from the 2018-19 report, where there was a gap of -1.48% in favour of women.
31. There is a pay gap in favour of men for median hourly part time pay of 9.45% in 2020, which is an increase from the 2018-19 where there was no gender pay gap reported. In 2021, there is a median hourly part time pay of 2.44% which represents a slight increase.

Operational Staff

32. In the operational group, 70% of staff are in the firefighter role, and so firefighter pay is the median hourly pay both for men and women for operational staff. There was no gender pay gap in this group for either full or part time hourly pay in 2020, this has not changed from the 2018-19 report. But for 2021, there was a slight increase of gender pay gap in favour of men to 1.07%.

FRS Staff

33. In 2020 there was a gender pay gap in median full time hourly pay in favour of men of 4.79%. This is a decrease in gap from the 2018-19 report, where there was a gap in favour of men of 7.79%. And in 2021, there was a slightly reduced gender pay gap in median full time hourly pay in favour of men of 4.01%.

34. In 2020 there was a gender pay gap in median part time hourly pay in favour of men of 11.16%. This is an increase from the 2018-19 report, where there was a gap in favour of men of 6.04%. In 2021 there was a decrease in the gender pay gap in median part time hourly pay in favour of men of 6.57%.

Control Staff

35. Amongst Control staff there are differences in pay gaps when reporting on full time and part time median hourly pay. There was a pay gap in median hourly full time pay in 2020 in favour of women of -2.23%, which is a very small increase of gap from -1.23% reported in the 2018-19 report. In 2021, it reduced back down to 1.29%.
36. In 2020 there was a pay gap in median hourly part time rate in favour of men of 21.66%, this is a significant increase in pay gap, which in the 2018-19 report was -1.21% in favour of women. This is similar in 2021 in favour of men at 22.7%.
37. The Control staff group is small (currently 107 in total) and represents just 2% of the LFB workforce, so the data can be skewed by individual employees.

Mean hourly pay in 2020 and 2021

All Staff

38. Using mean hourly pay, the gender pay gaps are different when reporting on the full and part time mean hourly pay rates. For full time staff in 2020, there was a gap in favour of women of -7.84%, a small decrease in gap from the 2018-19 report where there was a gap of -9.12%. In 2021 this increased to -10.17%. The reason for the gap in favour of women is that mean hourly pay is lowest in the operational group which is predominantly male, and men therefore represent the bulk of the lower-ranked workforce.
39. For part time staff in 2020, there was a gap in favour of men of 3.53%, which represents a decrease in gap from 10.40% reported in the 2018-19 report. In 2021, this decreased slightly to 2.99%.

Operational Staff

40. Again, there are differences in pay gaps when looking at part time and full time mean hourly pay rates. For full time operational staff in 2020, there was a full time pay gap in favour of men of 4.38%, an increase in gap from the 2018-19 gap of 1.5%. In 2021, this increased slightly to 5.87%.
41. For part time staff, there is a small pay gap in favour of women in 2020 of -1.55%, a very small increase in gap from -0.82% reported in the 2018-19 report. In 2021, this decreased to 1.5%.

FRS Staff

42. There are pay gaps in favour of men for both full time and part time mean hourly pay rates. For full time staff in 2020, there was a pay gap of 4.54%, a decrease from the 2018-19 report where a gap of 6.22% was reported. In 2021 this decreased to 3.83%.
43. For part time staff, there was a pay gap in 2020 in favour of men of 10.07%, which is a decrease from the 2018-19 gap of 18.86%. This increased to 14.53 in 2021.

Control Staff

44. There are pay gaps in the Control staff group across both full and part time mean hourly rates. For full time staff there is a small pay gap in favour of men in 2020 of 1.92%, a change from the 2018-19 report where a gap in favour of women was reported of -1.23%. This increased to 2.99% in 2021.
45. For part time staff, there was a pay gap in favour of men in 2020 of 18.66%, a significant increase in gap from the 2018-19 pay gap report where the gap was -5.23% in favour of women. This is broadly consistent in 2021 at 18.59%.

Data transparency

46. The analysis of workforce, pay and promotions data, including detailed recruitment data, is important in understanding gender issues. Following recent governance changes in April 2018, data on diversity will be submitted to the London Fire Commissioner and this may be scrutinised by the Fire, Resilience and Emergency Planning Committee (FREP). London Assembly members have a continuing interest in the relative performance of GLA bodies on gender and pay, and have asked for this data to be published as part of the Mayor's annual report.
47. LFB publishes a quarterly corporate performance digest 'Our Performance' which includes detailed reporting on gender in relation to recruitment, promotion and retention. A six-monthly People Services Performance Report is also published, highlighting detailed information and data on workforce demographics.
48. The Togetherness Strategy Action plan has committed to improving data transparency across the board and the publication of Equality Impact Assessments, along with the ongoing work in the production of a data dashboard will ensure that gender data is considered in all areas of work, and figures are current and easily accessible.

Tackling our pay gaps: context and actions

49. The key gender diversity issue for the LFB is to increase the representation of women in the operational workforce where women currently comprise just 8% of the staff group. A number of initiatives are being developed to improve this, along with representation and cultural change in other areas.

Transformation Delivery Plan

50. In January 2020, in response to the Phase 1 Grenfell Report recommendations and the HMICFRS inspection report, the new LFB Commissioner Andy Roe launched a Transformation Delivery Plan (TDP), setting out a new organisational vision, purpose, and three core behaviours.
51. The plan has two key enablers, one of which is diversity and inclusion, demonstrating a cultural shift and new direction to achieving diversity and inclusion across all areas of the organisation. The plan provides the structure and accountability for the new Togetherness Strategy (explained further below) and sets out key actions which will have a direct impact on the reduction of the gender pay gap.

Inclusion and Togetherness

52. In 2019 LFB doubled the capacity of the Inclusion Team to four full time members of staff, with a revised remit to launch a new Inclusion Strategy to underpin the Transformation Delivery Plan. The new strategy renamed the 'Togetherness Strategy', launched on 1 July

2020. It makes explicit commitment to taking action to increase representation of minority groups including women and has dedicated accountability measures for overseeing both gender and ethnicity pay gaps. In 2021, a further growth bid and successful recruitment have resulted in a team that comprises five full time members of staff, with the extra role focused on assurance and governance.

53. The Togetherness Strategy is supported by a Togetherness Board of strategic senior leaders who are named accountable against the strategy actions, and a Representative Committee comprising staff Equality Support Groups (LFB's staff networks) and representative bodies, including the Women in the Fire Service network, the Menopause Action Group and the Fire Brigade Union's Women's Action Committee. The Board have met four times and continue to review and guide Togetherness across the organisation.

Culture review

54. The commitment from the Commissioner to conduct a culture review of the organisation will assess the existing culture of the Brigade and consider the extent to which the Brigade and its employees have created a culture free from discrimination, unfairness and inequality. The review will seek to identify **areas for improvement** and **areas of strength**, publishing a report and making recommendations for improvement where appropriate.

Talent and Performance

55. The Transformation Delivery Plan introduced three new core behaviours for LFB staff: compassion, togetherness and accountability. A new behavioural framework was launched cross-organisationally in 2020, and will underpin all operational and non-operational recruitment, promotion, development and performance management.
56. In addition, a talent management framework is being developed which incorporates the new behaviours, and which will be rolled out for all staff. It has been piloted with the Top Management Group and will be evaluated brigade wide at the end of 2021/early 2022.

Leadership

57. The LFB Centre for Leadership was established in early 2019; it has developed its role as an in-house delivery arm for leadership development. Their work has included the development and delivery of the LFB's new behavioural framework as well as a wide range of leadership development courses, focused predominantly around our three core behaviours of compassion, togetherness and accountability. Pilots have been delivered across all staff groups with approximately 600 participants engaging in their programmes and workshops. Throughout 2021 they are developing a new leadership pathway that will provide leadership development for all staff including supervisory, middle, and strategic leaders.
58. In addition, the Togetherness Strategy commits to a number of actions relating to leadership and development, including training on inclusive leadership and the delivery of targeted leadership development programmes for underrepresented groups of staff, including women. In 2019 this included participation in the GLA Our Time Programme, on which five women from LFB participated. Our Time is a sponsorship programme that addresses the systemic barriers women face in reaching senior positions. It pairs high potential women with senior management level champions who can open up the professional networks, opportunities and contacts that are crucial to helping people progress in their careers.

Outreach

59. The Outreach Team was established in September 2017 and engages with under-represented groups (women, LGBT and BAME communities) to promote the role of a modern day

firefighter. In 2020, the team delivered over 25 information days, attended by over 160 women, (continuing to deliver these using live video communications during COVID-19 lockdown), and as a result LFB has seen a significant increase in applications and successful appointment to the firefighter role by women in 2020. The recruitment freeze has impacted outreach work, which has recently resumed.

| Year | Number appointed |
|------|------------------|
| 2017 | 28 |
| 2018 | 43 |
| 2019 | 56 |

60. In addition to career information days, the team support recruitment through attendance at targeted community-based activities such as career fairs, fitness events and cultural festivals across diverse boroughs of London. Women candidates are provided with support to meet the required standard for physical tests through one to one coaching, and the team work closely with local career and employment partners to encourage them to promote the role to their service users.

Coaching and mentoring

61. In 2019 we launched a structured Coaching and Mentoring programme across the Brigade. This has created a network of staff, from all staff groups who assist with providing support to staff from all grades. The Coaching and Mentoring programme is now under review with the intention to create four streams; improve diversity; career progression coaching; performance coaching and supporting the Leadership interventions. The feasibility of extending the network across the GLA, TfL and MOPAC is in discussion.

62. Reverse mentoring has been shown to be specifically effective in improving the diversity of the organisation and has been encouraged in both the Togetherness Action Plan and the Togetherness Policy. A formal programme may be an additional offering from the Coaching and Mentoring Network in the future. Focus groups are being held with women and members of the Black and Ethnic Minority groups across the Brigade to explore the most effective way of introducing and embedding Coaching, Mentoring and Reverse Mentoring.

Conclusion

63. There are significant actions being undertaken to tackle the varying gender pay gaps across the Brigade which have been impacted by the impact of COVID-19. The Togetherness Strategy and accompanying governance processes are a significant change since the 2018/19 pay gap report was published, and LFB expects to continue to close the pay gaps where they arise through the goals and objectives outlined in this strategy.

Impacts

64. This report reflects the commitments outlined in the Togetherness Strategy around pay gap reporting and supports ongoing work outlined in the Togetherness Strategy Action Plan to improve gender pay gaps.

Equality Impact

65. The London Fire Commissioner and decision takers are required to have due regard to the Public Sector Equality Duty (s149 of the Equality Act 2010) when exercising its functions and taking decisions.

66. 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.
67. 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.
68. The Public Sector Equality Duty requires us, in the exercise of all LFC functions (i.e. everything the LFC does), to have due regard to the need to:
- a) Eliminate discrimination, harassment and victimisation and other prohibited conduct.
 - b) Advance equality of opportunity between people who share a relevant protected characteristic and persons who do not share it.
 - c) Foster good relations between people who share a relevant protected characteristic and persons who do not share it.
69. 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, in particular, to the need to:
- a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic where those disadvantages are connected to that characteristic;
 - b) 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;
 - c) 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.
70. 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.
71. 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—
- a) tackle prejudice, and
 - b) promote understanding.
72. An Equality Impact Assessment (EIA) was undertaken on 17 September 2021. The impact assessment found predominantly positive impacts based on gap analysis that will support ongoing work in relation to the Togetherness Strategy that intends to improve the gender pay gaps identified.

Workforce Impact

73. The subject matter of this report is the workforce, specifically the gender pay gap. The report presents the data relating to the gender pay gap and outlines the ongoing work to address this, as outlined in the Togetherness Strategy and impending Culture Review. Work on this area, specifically in relation to recruitment and prioritisation has been impacted by COVID-19 in the two years covered by the report and reference can be made to the EIAs relating to this. The recognised trade unions have been provided with a copy of this report and any

comments received from the trade unions will be reported to People Board and Commissioner's Board as appropriate. The trade unions will continue to be involved in the development and delivery of action plans in respect of the gender pay gap, for example through the Togetherness Representative Committee referred to in paragraph 29 above.

Finance comments

74. The Chief Finance Officer has reviewed this report and has no comments.

Legal comments

75. The report sets out the London Fire Brigades gender pay information.

76. 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.

77. The Commissioner is a 'relevant public authority' for the purposes of the Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017. Regulation 3 and Schedule 1 of the 2017 Regulations set out the obligations on organisations with over 250 employees or more to publish gender pay gap information relating to employees annually, publishing on a national Government Website as well as the organisation's website. Schedule 1 sets out details of the type of information to be published. The purpose is to achieve greater gender equality across the UK and increase pay transparency.

78. There is no legal requirement to publish information in relation to ethnicity or disability pay gap, but this is good practice and in line with the Commissioners Togetherness Strategy, thereby demonstrating how the Commissioner meets the Public Sector Equality Duty to advance equality of opportunity.

79. 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.

List of Appendices

| Appendix | Title | Protective Marking |
|----------|-------|--------------------|
| 1. | None | |

Consultation

| Name/role | Method consulted |
|--|------------------------------|
| As this report is presenting data, consultation will be ongoing with regulatory bodies and Equality Support groups through the Togetherness Strategy Action Plan | EIA to Togetherness Strategy |