Communities and Local Government

FiReControl Project Report

Action Plan

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and Local Government

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October 2006
Department for Communities and Local Government: London

On 5th May 2006 the responsibilities of the Office of the Deputy Prime Minister (ODPM) transferred to the Department for Communities and Local Government (DCLG)

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Document Purpose

This document serves two purposes; firstly a formal response to the Race Equality Impact Assessment and secondly to act as guidance to all workstreams in meeting their responsibilities under the Race Relations Act.

Summary of Key Points/Messages

The FiReControl project and all associated work streams are required to impact assess all policies where appropriate in order to meet its obligations under the Race Relations Act. Thus far the project has taken into account race equality issues when formulating policies but not always in a formal way. This document helps to formalise a process of impact assessments for the project.

Action required on current version

Recipients should review the contents of this document.

Document Context

The document is in response to a Race Equality Impact Assessment commissioned by the Equalities and Diversity Unit of the then Office of the Deputy Prime Minister procured a Race Equality Impact Assessment (REIA) on behalf of the FiReControl Project in March 2006.

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Document	Reference	version

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INTRODUCTION

1. The Project welcomes the Race Equality Impact Assessment (REIA) and the opportunity it has given to engage and learn more about how equality should be considered within the remit of FiReControl. We take seriously the comments and recommendations that have been made and in this response lay out formally how we plan to move forward, embedding race equality within the Project's way of working.

2. Specifically we welcome the recognition by Equal Measures that the project is more likely to provide an opportunity for a positve impact rather than negative.

3. The FiReControl project and all associated work streams are required to demonstrate compliance and action where appropriate in order to meet Race Equality.

4. To aid this process in the future a policy screening form has been developed based on one produced by the Commission for Racial Equality. This form is annexed at the end of this document with a full explanation of how it should be used and examples of its application.

5. This response is broken into four sections; firstly a sketch is made of the background of FRS work on race equality to give a little more context to the project's endeavours; secondly a response is made to the specific areas the report highlighted as having potential for race impact; thirdly we give relevant responses and actions to the recommendations found in the conclusion of the REIA; in conclusion we explain the lessons learned from the process and give instructions on how the new policy screening form for race equality impact should be used.

BACKGROUND

6. The Equalities and Diversity Unit of the then Office of the Deputy Prime Minister commissioned a REIA on behalf of the FiReControl Project in March 2006. A consultant from Equal Measures undertook the assesment visiting the project on numerous occasions and meeting with a cross section of the national team.

7. Discussion of race in relation to the project needs to take account of the overall moves by DCLG and the FRS to make progress in the area of equality and diversity. The link below takes you to the main themes and priorities now being pursued. http://www.communities.gov.uk/index.asp?id=1123959

8. The extent to which the FRS is embracing this agenda is reflected in national and local community initiatives based around faith festivals, partnership working which follows community cohesion models, and a conscious effort through publicity and media to present positive images and attitudes. Clearly this has great importance for internal staff communication as well as with community stakeholders and the wider public.

9. There is also a greater FRS awareness of the links between social deprivation and fire risk. In terms of general safety advice and information, the Home Office development of the Single Non-Emergency Number will also be a driver for public confidence and understanding, and improved service delivery.

10. Much of this outreach work and community engagement has to be managed and taken forward as part of individual FRS community fire safety initiatives, such as the home fire risk assessment programme. However, control centres also have an important role to play and there should be equal emphasis on a diverse workforce as in other parts of the service.

RESPONSES ON SPECIFIC AREAS

11. The REIA identified a number of areas in which there was potential for race impact. Here are the project's comments on each area.

Employment

12. The report rightly notes that current control rooms are not racially diverse environments. It is an aspiration of the project that the improved operating environment, greater career opportunities, and potentially more flexible working patterns that RCCs will bring should encourage more applicants from a wider variety of ethnic backgrounds.

13. The project's People and Organisation Development (POD) workstream, together with senior HR representatives from each region, are committed to enabling Race Equality to be met through the guidance they are producing on HR policy and procedures for the new companies to consider adopting. The new companies will be reminded of their obligations under the Race Relations (Amendment) Act for REIA of all policies, and supported in their decision making on policy by the guidance produced.

14. The policies and procedures developed and adopted need to comply with the National Framework, the Fire Services Act 2004 and the breadth of the employment legislation, in particular all of the strands of equality.

15. To provide an indication of how this will be put into practice these are some principles that will be adopted.

- All policies must be impact assessed in the light of the guidance produced by the Chief Fire Officers Association.

- The impact of race equality and the scope for improving diversity will be included from development to implementation.

- The framework document includes the following statement at 17 to ensure that Equality is considered and the appropriate action taken when the opportunity arises.

16. The policies and procedures are designed to ensure that all candidates are treated fairly, with dignity and respect. It is consistent with equality best practice through an impact assessment, relevant legislation and, specifically, the Disability Discrimination Act, the Race Relations and the Race Relations (Amendment) Act, and the Sex Discrimination Act, and mechanisms are in place to ensure that the process runs smoothly and efficiently from end to end.

17. The responsibility of taking action in respect of Race Equality does not ultimately rest with the national project team. Responsibility for employment matters in the new RCCs falls to the company who will be managing and controlling the Regional Control Centres and by extension local FRAs who will own it. This means that there is a joint responsibility between the new companies and the FRAs to ensure that where decisions are taken on such matters as defining criteria for selection for redundancy, an assessment of the impact on the current staff needs to be undertaken. In addition, opportunity to improve diversity should be taken where appropriate, eg in taking any appropriate positive action when carrying out external recruitment. There is a wealth of good practice being used within the FRSs. For example, it would be beneficial to link into many of the established networks locally and nationally to assist with improving representation within the workforce.

However the national project will provide guidance to the new employers and the FRAs in order to help them to comply with statute.

Building Locations and Design

18. As part of the process of choosing RCC locations, consideration was given to demographics and proximity to workforce, with input provided from the Department's statisticians. Ethnicity was taken into account but there were strong policy reasons for weighting other criteria more heavily. The RCCs are part of the Critical National Infrastructure, so resilience had to be a key factor in the selection of sites.

19. We foresee a risk of there being a shortage of possible sites for the London RCC. The availability and cost of land is such that it has been necessary to amend the RCC design and tailor the original evaluation criteria with the intention of making more sites available. Analysis suggests that the criterion of locating an RCC in an area that may encourage diversity of employment could further increase the risk of sites not coming forward. If this were the case we would attach a low priority to ethnicity compared with the criteria that would affect the resilience of the RCC.

20. On the recommendation relating to Developers obligations under the Race Relations Act, we will contact the developers and remind them of their obligations, asking for details of what steps are being taken to meet these obligations.

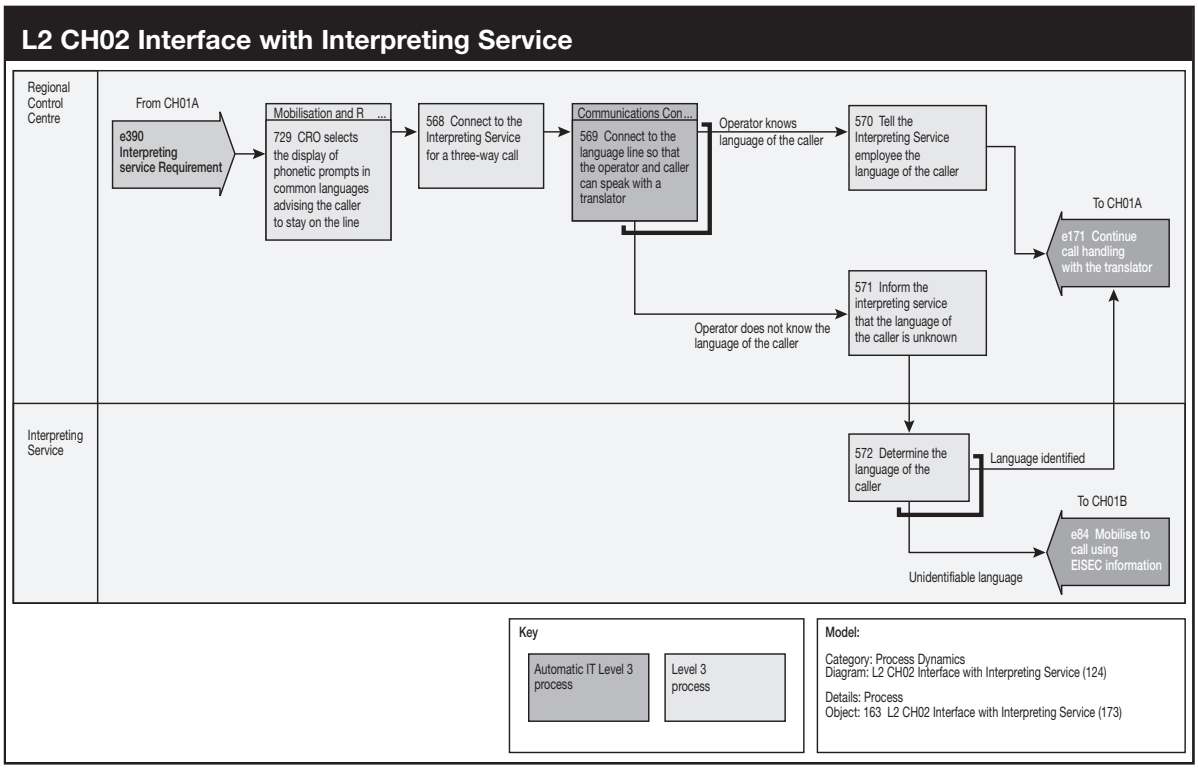
Service Delivery

21. The report rightly acknowledges that the new technology solutions that the Project will provide offer clear benefits for all communities in terms of service. In particular, the ability to locate all callers will specifically benefit those who find communication difficult, enabling a response to reach them even if they are unable to state their location.

22. Much discussion was had both during the assessment and since about the provision of interpretation facilities within control rooms to allow equal access to the service to all. The following requirements have been placed on suppliers who are bidding to provide the infrastructure services contract for RCCs;

- "The Contractor shall be responsible for the provision of a Translation Service for assistance during emergency call taking."
- "The MRMS should provide a facility for the Authorised User to display phonetic prompts for a number of common languages advising the caller to stay on the line. The language should be identified with the prompt."
- "The MRMS must provide the facility for an Authorised User to create and amend phonetic prompts."

23. The process is envisaged as follows:



24. This level of provision will exceed the current service allowing quicker and easier access to interpretation facilities within the control centre. However continued research at FRS level supports earlier anecdotal evidence that even in the most ethnically diverse areas of the country (like London) the need to use interpretation facilities is very rare (see Annex B). This suggests that services provided by FiReControl will be suitable to meet customer need in this area.

Procurement

25. The Project operates its procurement in conjunction with and under direct guidance from a central DCLG unit who specialise in this area. We understand that they have recently undergone a similar REIA and as such we will accept fully any recommendations they look to undertake in response to that process. This said, the Project will ensure that just like any other area, it is meeting all its requirements for procurement as they relate to Race Equality.

RESPONSES TO SPECIFIC RECOMMENDATIONS:

Recommendation	Action
The ethnic composition of existing staff who seek/obtain employment / redeployment/ redundancy should be subject to continued monitoring so that disparities can be investigated (although it may not be possible to influence individuals' choices about re-location opportunities).	The workstream will include a reference to ensuring race equality impact is included in all policies and procedures being developed to support the employment/ redeployment/redundancy.
Procedures for selection into the new posts, whether 'ring-fenced' or not, should be transparent and fair, checked for adverse impact.	We are working with Senior Regional Human Resource representatives to develop guidance on policies and procedures which can be adopted on a regional basis. These will meet this recommendation. Recommendations are also to be made with regards ensuring monitoring is on-going to evaluate impact. All procedures produced include a statement to ensure that race equality impact assessment is completed as appropriate.
Application and selection rates should be monitored for all posts.	This practice is already embedded in current policies and procedures, however during the transition arrangements the project will monitor application and selection rates for any new staff, where it is responsible for the recruitment. Monitoring will be recommended for other recruitment processes carried out by FRAs and the RCC companies.
Every effort should be made to use the various outreach strategies already adopted by some FRS to try to ensure that ethnic minority applicants are well represented among those seeking employment in any vacancies arising either in respect of jobs not 'ring-fenced' or of posts left vacant as a result of a net surplus of current staff seeking redundancy. Outreach efforts should be sustained over a long period, with a view to improving the ethnic diversity of control centre staff.	Recommendations can be absorbed into guidance to FRS on staffing.
If possible, diversity considerations should play some part in the choice of London location should a decision be made not to use the current site, even if only as an 'other things being equal' criterion after key resilience and other criteria are met.	It will be considered for inclusion when finalising the site evaluation criteria. However for strong policy reasons, the criterion of locating an RCC in an area that may encourage diversity of employment may be of lower priority than those relating to resilience.
The technological potential for the new centres to meet language needs and to help non-English speakers should be fully exploited, and the use of interpretation facilities should be monitored and reviewed regularly, with additional staff training provided should the need for this be suggested by the monitoring and reviews.	The requirements for the Infrastructure Services Contract already meet this specification. Equally a current review of interpretation facility usage seems to suggest it is rarely required. Ongoing monitoring and evaluation of the measures in place will be recommended to the new companies.
Outreach and publicity efforts may be required to ensure that people with language needs feel that they can turn to the 999 call as a first resort, rather than possibly feeling the need to rely on third parties to make contact for them.	This recommendation will be passed on to the relevant area of policy within DCLG.
Consideration may need to be given to other ways of ensuring that ethnic minority communities are aware of what they need to do in the event of a fire.	This recommendation will be passed on to the relevant area of policy within DCLG.

Continued

Recommendation	Action
Subject to what is already in development agreements/contracts already let, FiReControl should contact developers and contractors to remind them either of their contractual obligations in relation to race equality or of their legal obligations under the Race Relations Act, and to ask them what steps are being taken to meet these obligations.	We will contact the developers and remind them of their obligations, asking for details of what steps are being taken to meet these obligations.
Future procurement should make full use of the opportunities afforded for building race equality into all stages of procurement throughout the procurement chain.	The project will ensure that its procurement meets all obligations under the race relations act but will also await advice from central procurement following its own REIA.
As wider recommendations, there may be a need for specific guidelines to ensure that all workplace designs take account of the needs of a diverse community, as the RCC design did in this project. There may also be a need to ensure that location choices take account of the kind of social inclusion objective touched on in current draft guidance on 'Choosing Locations for Government Business'	The project will pass this recommendation onto the relevant government department.

RACE SCREENING POLICY:

26. To ensure that the good practice continues, a simple screening form has been developed (Annex A) based on the template developed by the Commission for Racial Equality. The form is designed to help anyone developing a policy to ensure they are not negatively impacting one group over another, this is not only relevant for race but could easily be used with minor adjustments for disability and gender assessments.

27. The form should be completed for all new policy objectives during their early stages so as to be most effective and to allow for maximum possible positive impact. Examples of when the form could be used are:

- When considering a new piece of guidance of regions, for example the guidance that was provided for the establishment of local authority companies.
- When taking a major decision on behalf of the project.

28. In order to integrate this procedure with project reporting, a reminder to complete the form will be added to the template for a product description due to be circulated to the regions. Once completed the form should be filed with PSO for future reference.

CONCLUSION

29. This has been a valuable process for the project to confirm its understanding of race equality and to show the need to be able to more easily demonstrate the positive impact FiReControl will bring. The screening process we have developed is expected to further embed race equality into the project.

30. We will review this position in six months time to ensure the process is operating effectively.

ANNEX A

FiReControl Race Equality Impact, Policy Screening Form

Consider each of the questions in turn. They should help to identify whether the policy has implications for equality of opportunity. In each case, use your best judgement and, if you think there are equality implications, explain briefly why you think so in the boxes.

(a) What is the purpose of the proposed policy and who is it intended to affect?

(b) Is there any evidence, or other reason to believe, that different groups have different needs, experiences, issues and priorities in relation to this particular policy?

☐ Yes ☐ No ☐ Maybe

(c) Is there any evidence, or other reason to believe that different groups could be affected differently by the proposed policy?

☐ Yes ☐ No ☐ Maybe

(d) Is there any evidence to suggest that any part of the proposed policy could discriminate unlawfully, directly or indirectly, against people from some racial groups?

☐ Yes ☐ No ☐ Maybe

(e) Is there an opportunity to promote racial equality more effectively by altering this policy or considering working with others in the wider community?

☐ Yes ☐ No ☐ Maybe

(f) Have previous policies, research, monitoring data, consultations etc, with relevant groups, organisations or individuals indicated that this particular policy may create problems, which are specific to them?

☐ Yes ☐ No ☐ Maybe

(g) Additional evidence/information (which does not fall into the above categories)

☐ Yes ☐ No ☐ Maybe

ANNEX B

Responses from FRAs on current interpretation facility usage

Fire & Rescue Authority	Do you use/ have access to an external translation service (eg Language Line)?	How many times, say in 2005, was it used?	How is the training for Control Room Operators in handling non English speaking and the use of the Translation Service in that process undertaken?
KENT	KFRS have never used the service in anger.	It is mainly used now for written translation for leaflets etc… We extended the use so that crews can now use it at scene, if required, via the Control Room. This has not yet been required.	We train on a bi-monthly basis (by using the training facility with the company and using some of our bilingual staff).
BUCKS	Don't use the service		
HAMPSHIRE	Do not currently use Language Line services and to date we have not experienced any problems as a result. We do use EISEC which assists in providing address of subscriber information automatically.		
SURREY	Yes, Language Line	Nil	All control staff currently undertake two days training focusing specifically on emergency call management. - This includes role plays using a variety of scenarios including language difficulties
LONDON	We are infrequent users of Language Line. But have unlimited access (24 -7) to professional qualified interpreters in over 100 languages; Text-to Speech over the phone translation of documents.	We have only used the service about 8-10 times since moving to Greenwich View Place (2 years). And about 30 calls/ conferences in total since 2001.	On site training day provided by language line.