

BOARD PAPER

Item Number	Item 6 – Paper 3
Title of Paper	Review of equality, diversity, and inclusion coverage within published Fire Standards
Decision or Information	For information and decision
Date of Meeting	21 st December 2022
Presented by	Fire Standards Team
Attachments	Appendix A – Equality, Diversity, and Inclusion Report

Summary

As part of the discussion about the third phase of Fire Standards development, the question of whether equality, diversity, and inclusion (EDI) was referenced appropriately in the published Fire Standards or whether a separate Fire Standard may be required was raised.

The Fire Standards Team advised the Board that EDI had been considered when developing each of the published Fire Standards and integrated, where relevant. However, the Board decided that it would be helpful for a review of the published standards to be carried out to ensure that EDI was referenced sufficiently and appropriately and to determine if a standalone standard was required.

In line with the Board’s instructions, the Fire Standards Team commissioned an independent consultant with expertise in Leadership and EDI to review each Fire Standard and to produce a report (which is at Annex A) with their findings, including any recommendations they may have. On the back of that report, this paper makes recommendations for the next steps.

Recommendations

The Board is asked to:

1. Review the report and consider its conclusions and recommendations; and
2. Agree the following actions which based on the report’s recommendations:
 - a. The Fire Standards Team to ensure that a suitable methodology is used when developing and reviewing Fire Standards to ensure appropriate references to EDI are made;
 - b. The findings in relation to the Protection Fire Standard are explored with the NFCC Protection Team and any consequential changes made; and
 - c. The findings of the report in relation to the Core Code of Ethics are discussed with the “owners” of the Core Code.

Fire Standards – Equality, Diversity, and Inclusion Coverage Report

This report has been prepared for the Fire Standards Board by Claire Whitehead-Wall, Leadership Consultant. It reports on an equality, diversity, and inclusion (EDI) gap analysis exercise undertaken on published Fire Standards during November 2022.

Two questions were posed for consideration within the exercise:

1. Is there sufficient coverage of EDI in the 12 previously published Fire Standards?
2. Is there a need for a separate Fire Standard for EDI?

Equality, diversity, and inclusion go hand in hand, but the concepts have important differences. For clarity, the following CIPD definitions¹ of equality, diversity and inclusion have been used to benchmark the standards:

- **Equality** ensures that every individual has equal opportunities, regardless of their background, identity or experience.
- **Diversity** refers to the representation and recognition of people with different characteristics. In the UK, it is against the law to discriminate against someone with a ‘protected characteristic’. These include: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation. In addition to protected characteristics, employers may also wish to consider diversity of other characteristics, such as socioeconomic background, as well as considering intersectionality, wherein people may have multiple, overlapping identities that can impact their experiences.
- **Inclusion** is about going beyond representation and recognition, to valuing these differences and enabling everyone to thrive at work. An inclusive workplace is one where people feel they can perform to their full potential, and that they belong in the organisation without needing to conform or mask their identities.

For best practice purposes I have referred to the inclusion aspect of this definition as inclusivity throughout this report.

¹ (CIPD (2021) Inclusion and diversity in the Workplace Factsheet, London: Chartered Institute of Personnel and Development)

This report considers the coverage of EDI within the following Fire Standards:

1. Code of Ethics
2. Community Risk Management Planning
3. Data Management
4. Emergency Preparedness and Resilience
5. Emergency Response Driving
6. Fire Investigation
7. Operational Competence
8. Operational Learning
9. Operational Preparedness
10. Prevention
11. Protection
12. Safeguarding

Each standard was reviewed for coverage of EDI in a desk-based analysis exercise.

Six standards were found to have no explicit reference to EDI in them. The need for an explicit reference was considered, but it was not believed necessary for these particular standards at this time because they stand well without an explicit EDI statement. It would seem inappropriate to insert such a statement for the sake of it, almost like putting in a “it ticks a box” statement which is not how EDI should be represented.

It would be good practice for review processes to consider the need for an explicit reference to EDI as part of the periodic review cycle for standards. Something like an Equality Impact Assessment might be a useful vehicle to use to undertake that review, but it is for the review process owners to decide their preferred review methodology.

Six standards were found to have an explicit reference to EDI (see Appendix B). In all cases, this was deemed sufficient coverage of EDI for that standard.

Code of Ethics Fire Standard

The Core Code of Ethics Fire Standard has an explicit reference to inclusivity in point 9, however when you link through to the actual Core Code of Ethics there is only reference to Equality and Diversity. This could be interpreted that the Core Code of Ethics does not reference inclusivity enough compared to the standard. The Core Code references equality and diversity in several places plus contains a specific section about them. However, there does not appear to be the same weight given to references to Inclusion or Inclusivity.

The national landscape has evolved over the last few years and particularly since 2019 there has been a movement for organisations to take EDI further: to embed it in organisation culture and move to true inclusivity.

The Chartered Management Institute's (CMI) 2022 Annual Report suggests:

"Promoting true diversity and being genuinely inclusive is important in its own right, for organisational success. It is also a fundamental part of creating a sustainable culture and embedding sustainability in the heart of an organisation. Put simply, that has to be the way of the future." - Professor David Grayson, 75th Advisory Council

And CMI's "The Everyone Economy Report" published in June 2022, states:

"...diversity and inclusion are key to securing sustained success in business, public services and all organisations, and we all have a long way to go."

For that reason, I would ask the Fire Standards Board to consider providing feeding of these findings to the authors of the Core Code of Ethics.

Protection Fire Standard

The Protection Fire Standard lists a number of "Linked Qualifications". It was noted that qualifications below Level 7 have no 'or equivalent' options listed. The query is whether there could be historic equivalent qualifications that would be adequate and in not recognising this, it could be considered as discrimination? Therefore, to be truly inclusive, I would suggest considering whether the term "or equivalent" should be added for those qualifications at Levels 3-6?

For that reason, I would suggest the Fire Standards Board clarify this with the relevant subject matter experts and potentially amend the Fire Standard.

Potential of EDI Fire Standard

I then considered the need for a separate Fire Standard for EDI. Best practice highlights that EDI should be an integral part of organisational culture and the fabric of the organisation.

In order to improve culture within an FRS, there is a need to work to ensure EDI is embedded through good leadership, transparency, and honesty which organisations need to continually review to ensure they are improving where it is needed to achieve true inclusivity.

Having a separate EDI Fire Standard risks putting EDI into a 'silo' and so risks the organisation failing to embed it fully into all areas of the organisation.

For that reason, I strongly believe that EDI should underpin all Fire Standards and not be separated out into its own standard.

Conclusions

Having undertaken the gap analysis exercise and desk-based research I have the following conclusions for the Board to consider:

1. Of the published Fire Standards, six already have explicit EDI coverage so no further action is required at this stage.
2. Six have no explicit reference to EDI but this should be reviewed as part of their next periodic review process.
3. I would urge the Board to ensure that the Fire Standards periodic review process includes the need to check for EDI references.

Recommendations

I would propose that the Board consider:

1. For the Code of Ethics Fire Standard:
Findings from the report are shared with the authors of the Core Code of Ethics for consideration.
2. For the Protection Fire Standard:
It is clarified if qualifications below Level 7 should have equivalents accepted.
3. A standard-alone EDI Fire Standard
That EDI does not have a separate Fire Standard, it is instead considered to underpin all Fire Standards.

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8th December 2022

Review of Published Fire Standards – desk-based evaluation analysis

Fire Standard	Explicit Coverage of EDI?	Further Action
1. Code of Ethics	Yes. Found in “What is required” section multiple points	The Core Code of Ethics covers Equality and Diversity in its EDI Principle, should this be extended to include Inclusivity? Extract as example: Core Code of Ethics Guidance page 18 “You actively seek or use opportunities to promote equality and diversity” – should it be Equality, Diversity and Inclusion?
2. Community Risk Management Planning	Yes. Found in “What is required” section point 3	No further action, review currency as part of normal review process
3. Data Management	No mention of inclusivity in this standard	Consider if “data is accessible to all” – inclusivity coverage could be explicit. Review as part of normal review process
4. Emergency Preparedness and Resilience	No mention of inclusivity in this standard	Unsure of the need to overtly include reference in this standard. Review as part of the normal review process
5. Emergency Response Driving	No mention of inclusivity in this standard	Unsure of the need to overtly include reference in this standard. Review as part of the normal review process

Fire Standard	Explicit Coverage of EDI?	Further Action
6. Fire Investigation	Yes. Found in “What is required” section point 12	No further action, review currency as part of normal review process
7. Operational Competence	No mention of inclusivity in this standard	Unsure of the need to overtly include reference in this standard. Review as part of the normal review process
8. Operational Learning	No mention of inclusivity in this standard	Unsure of the need to overtly include reference in this standard. Review as part of the normal review process
9. Operational Preparedness	Refers to legislative responsibilities but no specific mention of equalities legislation. No specific mention of inclusivity	Unsure of the need to overtly include reference in this standard. Review as part of the normal review process
10. Prevention	Yes. Found in “What is required” section multiple points	No further action, review currency as part of normal review process
11. Protection	Yes. Found in “What is required” section point 1b	Current qualifications listed, for inclusivity should this section include ‘or equivalent’ at all levels not just Level 7
12. Safeguarding	Yes. Found in “What is required” section multiple points	No further action, review currency as part of normal review process