

Equality Impact Assessment (EIA) Form

The **purpose** of an EIA is to give **as much information as possible** about potential equality impacts, to demonstrate we meet our **legal duties** under the Equality Act 2010.

Please read the EIA Guidance [on Hotwire](#) before completing this form.

Once you open the template please save it on your OneDrive or SharePoint site. Do not open the template, fill it in and then click Save as this will override the template on Hotwire.

NOTE – All boxes MUST be completed before the document will be reviewed.

1. What is the name of the policy, project, decision or activity?
Proposal to increase the period of maternity leave during which staff are entitled to from 15 weeks full pay and 24 weeks half pay to 46 weeks full pay; increase the allowance for maternity wear from £30 to £200; bring forward the start of maternity support leave (MSL) to commencement of labour, rather than birth; changes to policy wording to make provision of MSL for watch-based staff clearer.

Overall Equality Impact of this policy, project, decision or activity (see instructions at end of EIA to complete):

High		Medium	X	Low	
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2. Administration	
Name of EIA author	Joe Drohan
Have you attended an EIA Workshop	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Department and Team	People Services; People Partner Team
Date EIA created by author	24/04/2023
Date EIA signed off by Inclusion Team	15/08/2023
Date Actions completed	



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External publication	Are you happy for this EIA to be published externally?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> If No state why:
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3. Aim and Purpose	
What is the aim and purpose of the policy, project, decision or activity?	Changes to the Brigade's maternity and adoption pay to improve the experience of new and expectant mothers / primary adopters and their partners, benefiting the Brigade's recruitment and retention of female staff.
Who is affected by this work (all staff, specific department, wider communities?)	New and expectant mothers and their partners; staff adopting children.
What other policies/documents are relevant to this EIA?	Policies 555a and 555b.

4. Equality considerations: the EIA must be based on evidence and information.	
<p>What consultation and engagement has taken place to support you to predict the equality impacts of this work?</p> <p>Consultation must take place with ESGs (including RB ESGs), Learning Support and affected groups.</p>	<p>The proposal to increase maternity pay was originated by the Women's Action Committee (WAC) following consultation with their members. It has not been possible to conduct wider consultations on the proposed changes due to the timeframes requested by the Commissioner. WAC and wider TU colleagues will be consulted on the changes made to the policy to ensure they align with the original intent, once the funding needed to make the changes has been agreed by the Fire and Resilience Board.</p>

5. Cultural consideration: the EIA must consider how the work improves the culture of the organisation	
<p>How does this piece of work contribute to improving the culture of the organisation? How does this piece of work improve staff divides? Can you provide evidence?</p>	<p>This policy change aims to enable women / primary adopters to take their full maternity / adoption leave entitlement, should they wish to, by significantly reducing the financial impact of taking time off. It also identifies funding for maternity / adoption leave cover, which seeks to reduce the operational impact and therefore stigma of taking time off.</p>

6. Wellbeing considerations	
<p>How will this piece of work impact the physical and mental wellbeing of staff and communities in London?</p>	<p>The ability to take longer off before being impacted financially will reduce the number of people returning before they are fully ready to. As part of wider plans to improve the overall approach to maternity / adoption leave, this will give staff returning the opportunity to</p>



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	regain their fitness and put plans in place to enable the right work life balance.
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7. Assessing Equality Impacts

Use this section to record the impact this policy, project, decision or activity might have on people who have characteristics which are protected by the Equality Act.

Protected Characteristic	Impact: positive, neutral or adverse	Reason for the impact	What information have you used to come to this conclusion?
<i>Example: Age</i>	<i>Adverse</i>	<i>Moving this service online will adversely affect older people, who are least likely to have access to a computer or smart phone and may not be able to use the new service.</i>	<i>GLA Datastore: X% of the London community are aged 70 or over. GLA data shows that only 10% of those over the age of 70 have regular access to a computer or smart phone.</i>
Age (younger, older or particular age group)	Neutral	<p>This change is more likely to impact staff of an age more likely to have children. Between 2017 and 2022, 75.4% of staff taking maternity leave were aged 30-39; 17.4% were aged 20-29 and 7.2% between 40-49.</p> <p>Shared parental leave was more like to be taken by older staff, with 71.9% of users aged 30-39, 18.8% aged 40-49 and 9.4% aged 50+.</p> <p>30-39 was also the most common age group to take maternity support leave, at 70.3%.</p> <p>The impact is neutral, however, as this profile is unlikely to change as a result of the changes proposed.</p>	LFB Staff Statistics, April 2023
Disability	Positive	Studies have found links between longer periods of maternity leave and decreased depressive systems ¹ . By increasing the amount of paid time available to new	Psychiatry.org - Parental Leave Brings Mental Health Benefits, Especially for Mothers.

¹ <https://www.psychiatry.org/News-room/APA-Blogs/Parental-Leave-Mental-Health-Benefits>

(physical, sensory, mental health, learning disability, long term illness, hidden)		mothers, this policy makes it easier for women to remain off longer if they feel this would be of benefit to them, thereby reducing the risk of stress, anxiety or depression.	
Gender reassignment (someone proposing to/undergoing/ undergone a transition from one gender to another)	Neutral	By law, if a person changes legal gender, they do not lose their legal status as the mother or father of an existing child. That means that a transgender woman remains her child's legal father if she legally becomes a woman and a transgender man remains his child's legal mother if he legally becomes a man. It should be noted that the Brigade does not currently collect data on gender reassignment.	Gender Recognition Act 2004; Equality Act 2010
Marriage / Civil Partnership (married as well as same-sex couples)	Neutral	The proposed changes would apply to new mothers / primary adopters regardless of their marital status. The aim of the policy is to enable those who wish to take longer periods of maternity or adoption leave to do so by delaying the point at which the decision becomes a financial one; this should greatly reduce the pressure where the mother or primary adopter is also the primary or sole earner in their household. Further work is planned to review shared parental leave, which would further reduce this stress. The Brigade does not currently collect data on marriage / civil partnership.	
Pregnancy and Maternity	Positive	In addition to the potential for decreased incidence of stress, anxiety and depression set out above, the proposed change also seeks to increase the financial wellbeing of those on maternity or adoption leave. A	Survey analysis: Maternity Leave and the cost of living crisis - Maternity Action

		<p>recent study² showed that new and expectant mothers are making significant and unsustainable cuts to their quality of life, such as cutting meals and not heating their homes in order to live within the reduced income they receive whilst on maternity leave. Although this study was not specific to firefighters or the fire and rescue sector, it may be considered that female firefighters face similar issues while on maternity leave. This policy change represents an increase of 68.5% of paid time off and so should make a significant impact on the financial challenge this group faces.</p> <p>Although the overall impact for pregnant staff is considered to be positive, there are potentially staff who are pregnant who will not benefit from the proposed changes to maternity pay. Staff who experience stillbirth or miscarriage before 24 weeks of pregnancy, or who give birth as part of a surrogacy arrangement will not be eligible for maternity pay. This is a continuation of current arrangements so is not a direct negative impact. However, it may be considered that increasing a benefit predominantly provided to staff who carry a baby beyond 24 weeks or adopt a child, will potentially lead to a reduction in equality between different groups of pregnant staff based on their individual circumstances. LFB’s existing maternity policy states that “sympathetic consideration will be given as to what action is necessary by way of granting a period of paid leave or sickness absence” so there is existing provision for this to be mitigated.</p>
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² <https://maternityaction.org.uk/2023/04/survey-analysis-maternity-leave-and-the-cost-of-living-crisis/>

<p>Race (including nationality, colour, national and/or ethnic origins)</p>	<p>Neutral</p>	<p>Ethnicity pay gap reporting shows that LFB staff from ethnically diverse backgrounds had a median pay gap of 0.8% and a mean pay gap of 4.52% in 2022. Given this, the issues concerning the financial impact of maternity or adoption leave likely disproportionately affect ethnically diverse, which this proposal will help to alleviate.</p>	<p>LFB Staff Statistics, April 2023</p>
<p>Religion or Belief (people of any religion, or no religion, or people who follow a particular belief (not political))</p>	<p>Neutral</p>	<p>No change from current policy.</p>	
<p>Sex (men and women)</p>	<p>Neutral</p>	<p>The majority of benefit will be enjoyed exclusively by women (maternity leave and allowance for maternity wear); men are however equally eligible to take adoption leave as a primary adopter.</p> <p>Male staff will not be directed affected by this policy change. As LFB does not pay for shared parental leave above the statutory minimum amount, male staff do not have access to these benefits currently (except as primary adopters), and this will continue. It may be considered that increasing a benefit predominantly provided to one sex leads to a reduction in equality between sexes within LFB. However, this assessment has to be balanced against the variety of other factors affecting experiences of LFB employment for women and men.</p> <p>Currently, women make up 18.26% of the LFB workforce (10.04% in Ops): this change represents positive action to advance equality of opportunity by enabling more women to remain in the workforce while</p>	<p>LFB Staff Statistics, April 2023</p>

		<p>taking the time off they're entitled to after the birth of a child.</p> <p>Whilst this change will primarily have a positive impact, there is a potential negative impact on women and primary adopters not being able to maintain their skills and development (especially on the ops side) while on leave. Caring responsibilities have been deemed as being a contributing factor to gender pay gaps due to extraction from the workplace leading to missed opportunities, which typically impact women more than men, however this an extant issue that this policy change does not necessarily exacerbate. LFB has committed to undertake a holistic review of parental leave policies, including work to make women's return to the workplace easier, thereby decreasing the length of time they are non-operational.</p>	
<p>Sexual Orientation (straight, bi, gay and lesbian people)</p>	<p>Neutral</p>	<p>No change from current policy.</p> <p>While maternity leave can only be applied to women (and so would be unavailable to gay male couple, for example), adoption leave can be taken by anyone regardless of gender or sexual orientation and is broadly analogous to maternity.</p> <p>Further work is required to understand the impact of this policy change on staff who are not in straight/heterosexual relationships. For instance, while all female staff would be eligible for maternity pay after giving birth to a live infant, this would not be the case for a lesbian member of staff who becomes a mother after their partner gives birth. As LFB does not have pay</p>	<p>LFB Staff Statistics, April 2023</p>

	<p>for shared parental leave above the statutory minimum amount, lesbian staff do not have access to these benefits currently (except as primary adopters or by giving birth), and this will continue. It may be considered that increasing a benefit predominantly provided to straight/heterosexual staff and leads to a reduction in equality between LFB staff of differing sexual orientations. It should be noted however that the purpose of this policy change is, in large part, to ensure that women who give birth are able to remain absent from work for sufficient time to allow their bodies to recover, which would not apply to those people identified above.</p> <p>6% of Brigade employees identify as LGB: 8.1% of Control staff, 6% of FRS staff, and 5.9% of Operational staff.</p>	
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8. Impacts outside the Equality Act 2010

What other groups might be affected by this policy, project, decision or activity?

Consider the impact on: carers, parents, non-binary people, people with learning difficulties, neurodiverse people, people with dyslexia, autism, care leavers, ex-offenders, people living in areas of disadvantage, homeless people, people on low income / in poverty.

Extended maternity and adoption pay will enable more staff to take the full amount of maternity leave, particularly those on a lower income. Between 2017 and 2022, 42.2% of staff who took maternity leave returned to work within nine months – the point at which half-pay runs out. This change will remove or lessen the financial barrier that may prevent staff on lower household incomes from taking more of their leave entitlement.

9. Legal duties under the Public Sector Equality Duty (s149 Equality Act 2010)

How does this work help LFB to:

Eliminate discrimination?	This change will make it more financially viable for women to use the full amount of maternity leave being offered and will improve their workplace experience prior to maternity leave with enhanced maternity clothing allowance.
Advance equality of opportunity between different groups?	The extension of paid maternity leave will enhance the offer to female staff, making LFB a more attractive place for women to work and increasing our recruitment and retention of women. A further consideration is that increasing the likely period of maternity leave will advance the opportunities of those seconded in to backfill them, as they will have longer in-role to develop.
Foster good relations between different groups?	This policy change is in response to a request made by the Women’s Action Committee of the FBU and will improve the relationship between LFB, that group’s membership, and women in the organisation generally.

10. Mitigating and justifying impacts		
Where an adverse impact has been identified, what steps are being taken to mitigate it? If you’re unable to mitigate it, is it justified ?		
Characteristic with potential adverse impact (e.g. age, disability)	Action being taken to mitigate or justify	Lead person responsible for action

11. Follow up, actions and evaluation		
Where the Inclusion Team or other stakeholders have recommended actions in order to demonstrate due regard, these must be recorded here and delivered in accordance with time scales. Additionally, what is the organisational learning in relation to this piece of work in regards to the Equality Act 2010.		
Action recommended and person responsible for delivery	Target date Action to be completed by	Date action completed

Lessons learnt and evaluation		
Free text		


Now complete the RAG rating at the top of page 1:

High: as a result of this EIA there is evidence of significant adverse impact. This activity should be stopped until further work is done to mitigate the impact.

Medium: as a result of this EIA there is potential adverse impact against one or more groups. The risk of impact may be removed or reduced by implementing the actions identified in box 8 above.

Low: as a result of this EIA there are no adverse impacts predicted. No further actions are recommended at this stage.

Document Control

Signed (lead for EIA / action plan)			Date	15/08/2023
Sign off by Inclusion Team	Deborah Alleyn		Date	15/08/2023
Stored by				
Links				
External publication	Are you happy for this EIA to be published externally?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	If No state why: