Equality Impact Assessment (EIA)

Recruitment and Retention Policy

Equality Impact Assessment Form

Purpose

This Equality Impact Assessment (EIA) ensures that the service's policies, projects and provision does not unlawfully discriminate against any person, especially those who fall under protected characteristics outlined in the Equality Act 2010. EIA's go well beyond our legal requirements and public sector equality duties. This document sets out to identify any risk(s) to people and provides some description to how we intend to mitigate such risk.

Once an EIA has been complete, it will need to be checked and signed off by the relevant Head of Department. If the person completing the EIA is unclear about any of the content, please see some support and guidance from the Inclusion team using the following email address: equalities@cheshirefire.gov.uk.

Name of policy / initiative / service to be impact assessed	Recruitment and Retention Policy
Corporate objective being addressed	
Department / function carrying out the assessment	Human Resources and Transformation Team
Who is responsible for the implementation of the policy / initiative / service? (function head /department manager)	Managers, Leaders and Human Resources
Who is involved in the impact assessment process?	Human Resources Policy Officer Equality and Inclusion Officer
What are the aims / objectives / expected outcomes of the policy / initiative / service?	This policy sets out the guiding principles and procedures for all internal and external recruitment, selection and retention activity within the Service. The policy ensures that all relevant statutory and non-statutory requirements are achieved and the recruitment and selection process is robust.

Who is intended to benefit from the policy?	The policy outlines the importance for all recruiting line Managers; Leaders, Human Resource Staff and any other relevant decision makers involved in the recruitment and selection process are fully aware of this policy and are committed to its implementation.
Is the policy/initiative/service for external or internal purposes?	Internal
Does this policy/initiative/service affect the On-Call duty service?	Yes
Are other organisations involved in the delivery? If yes please state who:	n/a
What information / previous experience do we have i.e. a similar initiative and what did this information tell us? (info can be demographic data i.e. census findings, research findings, comparisons between similar policies in our Service and other Services, survey data, equality monitoring data, ad hoc data gathering exercises)	- Historical and current workforce data from our internal HR systems. - Equality monitoring information and insight. - Other interconnecting policies, which support recruitment and selection.
Has a similar impact assessment been conducted by other Fire and Rescue Services or local authorities in respect of a similar policy / initiative / service? If yes – is it possible to adapt / incorporate findings	Various council, NHS trust and university EIA's have been reviewed to identify best practice and risk factors.
Date of next policy / initiative / service review (if applicable)	February 2024

Equality Matrix and Scoring

The equality impact assessment is based on the RAG risk scoring as follows:

LIKELIHOOD				
Unlikely	Low probability	Possible	High probability	Almost Certain
1	2	3	4	5
VL	L	M	H	VH

IMPACT		
5	VH	Catastrophic – legal action (discrimination claim)
4	H	Major – serious matter that may lead to negative publicity and disciplinary action within service context
3	M	Moderate – external complaint or internal grievance
2	L	Minor – Additional small amendment or changes to policy, initiative or service.
1	VL	Little impact – minor considerations only required.

		IMPACT				
		VL	L	M	H	VH
		1	2	3	4	5
VH	5	5	10	15	20	25
H	4	4	8	12	16	20
M	3	3	6	9	12	15
L	2	2	4	6	8	10
VL	1	1	2	3	4	5

(LIKELIHOOD – row axis)

Overall Rating	Description	Monitoring
1 – 5 Manageable Risk	The risk may be so low that we choose to accept it and instead simply record that the risk has been identified and that due to its low likelihood or impact no further action will be required. Alternatively, minor considerations may be needed on implementation.	Department will maintain oversight

6 -10 Medium	The EIA owner will need to consider slight amendments or further controls to the substance of the policy/initiative/service to take account of any issues identified OR GM to confirm that all reasonable steps have been taken to mitigate the risk and no further reasonable action is possible	and continue to manage locally
12 – 15 High	The policy / initiative / service cannot be rolled out until detailed external and/or internal consultation has taken place with those that the policy / initiative / service affects.	Updates provided to the Recovery Planning Team with monthly updates to SMT
16 – 25 Very High	Take immediate action. If legal action is likely then we cannot go ahead with the policy / initiative / service, without fundamentally changing it. If even with this mitigation, the impact remains severe, then consultation with internal and/or external groups will need to go ahead.	Planning Team with monthly updates to SMT

Outlined below are relevant groups who may be affected by the policy / initiative / service and suggested impacts (**please note that these suggestions are not exhaustive and you will need to consider whether there are any further impacts**). Enter a commentary explaining the potential risk and impacts on both employees and external community groups. Specify any controls, which are currently in place to address and mitigate these impacts. Insert any statistics you currently have (both nationally and locally) to identify who is/will be most affected by the policy / initiative / service e.g. 17 – 24 year olds are over represented in Killed and Seriously Injured statistics etc. Please document all impacts, both negative and positive.

Equality Impact Assessment			
Protected Characteristics or Equality Theme			**Impact/Risk**
Age (younger, working age, older or particular age group)			The policy outlines how every job applicant, internal and external; applying for a vacant post will receive fair and equitable treatment, regardless of their age, whilst also seeking to recruit only the best people for the job. Selection is based on merit alone using the Service's Recruitment and Retention Policy and guidance.

The only age restriction is where prospective candidates have to be 18 years old or over to fulfil an operational role. There is an opportunity to include a question in the FAQ section to provide clarity that a person needs to be aged 18 or over to take up an operational role.

The policy outlines several entry points for people to join the Service and all are inclusive across all age groups. The FAQ section could feature an example where the Service actively encourage people across all age groups to apply for a particular role (i.e. apprenticeship) which may be |
| Likelihood | Impact | Overall | |
| 1 | 3 | 3 | |

			wrongly perceived by the public as a role for a specific age group, when it is in fact open to all age groups.

The policy misses an opportunity to refer to positive action or examples of how any targeted advertising for vacancies successfully reaches out to women concerning recruitment. |
| **Disability** (i.e. physical, sensory, long-term health condition, hidden) | | | The policy outlines how the Service are committed to equality of opportunity, the right for any person with a disability to be treated with dignity and respect and the elimination of unfair and unlawful discrimination in all its policies, procedures and practices.

The policy highlights how a person with a disability is guaranteed an interview for employment when they meet the essential criteria, given they meet the relevant person specification or where it is possible to offer reasonable adjustments to the work environment. |
| Likelihood | Impact | Overall | |
| 1 | 4 | 4 | The policy highlights how the application forms are available in different formats (i.e. large print, braille, moon, audio etc.) upon request and any written material used during the selection process will be available in a form that is accessible to any candidate).

The policy highlights how they intend to appoint people into vacant posts based on merit, the Service may in appropriate circumstances, apply Positive Action initiatives. The policy provides an example where it can be demonstrated that two candidates are as qualified as each other to undertake the role in question, appointment to a candidate who has a protected characteristic in preference to another candidate who does not possess that particular characteristic is justified where there is an underrepresentation within the existing workforce. This is in accordance with section 158 of the Equality Act 2010. This particular approach does carry some risk and therefore selection decisions based on this approach should be well thought-out.

The policy highlights that exit interviews are a useful way to capture information to help improve future selection, employee retention and to identify/resolve any particular departmental problems which the employee has felt unable to resolve sooner. The information gathered from exit interviews help identify any trends where a person with a disability may be disadvantaged, excluded or discriminated against. Although the Service will do everything it can, this mechanism is a useful |

		   	way to capture any cases where the Service could make positive changes in the future as a way to retain talented and valuable staff.

Mental Health			As a Service, CFRS are fully aware that under the law, they do not ask any questions about the nature or severity of a candidate's disability and/or mental health pre-offer. Although the Service follow this law, consideration could be highlighted in the policy to provide clarity.
Likelihood	Impact	Overall	Although the policy does not present any risks of discrimination to people with mental health, there is a missed opportunity to provide examples how the Service are proactively supporting staff with mental health conditions and there is no reference to the range of provision that has been developed in recent years.
2	3	6	

Gender Re-assignment / Identity (someone in transition from one gender to another or a person who does not conform with the gender assigned to them at birth)			The policy misses an opportunity to provide any examples how the Service are actively targeting trans people and those who identify as non-binary. Trans people feature as part of the Services 50/50 campaign, which is a bold advertising campaign which challenges traditional stereotypes of fire staff being white, heterosexual and male. This forward thinking initiative should be included in a policy that focusses on recruitment and retention.
Likelihood	Impact	Overall	
2	3	6	

Pregnancy and Maternity (Pregnancy, maternity leave, breast-feeding)	The policy has some reference to maternity, but there are no examples or reference which highlight the positive impacts on pregnancy for prospective staff members or existing staff.

Likelihood	Impact	Overall	Although the service, actively promote inclusion for people who are pregnant and/or returning to work from maternity leave, there is an opportunity to provide clarity and examples in the policy.
2	3	6	The FAQ section may be the ideal location to provide some examples and clarity.

Race (Ethnic origin, nationality, colour, including Gypsies, Roma & Travellers)			The policy highlights how the Service specifically targets different ethnic groups with advertising and marketing of vacancies. This consideration overlaps with our intention to recruit from the widest possible talent pool and our positive action work.
Likelihood	Impact	Overall	The policy highlights that application forms will be made available in different formats (i.e. large print, braille etc.) upon request, there is no reference to providing forms or guidance documents in an alternative language. Although, it must be acknowledged that the Service are able to translate materials such as application forms, inclusion in the policy could provide clarity, especially where there is a demand to provide application forms for a person who may not be fully confident with English language at that moment in time.
1	4	4	

Religion/Belief System (Christian, Muslim, Hindu, Jewish, Buddhist, Sikh, Vegan etc.)			The policy misses an opportunity to demonstrate how the Service effectively promotes religious awareness amongst staff and how there is lots of support for staff with religious needs or belief systems.
Likelihood	Impact	Overall	This provision in place helps to create an inclusive workplace where people with religious needs feel supported embraced and understood. Reasonable adjustments (i.e. flexibility, amendments to break time or Rota) can be arranged, especially at certain times of the year when religious people may need to prepare or be involved in religious festivals, celebrations or observations.
1	3	3	

| Gender (Men or women) | | | Women make up just over half of the Cheshire population, so recruitment and retention is an extremely important objective for the Service.

The policy highlights how they intend to appoint people into vacant posts based on merit, the Service may in appropriate circumstances, apply Positive Action initiatives. The policy provides an example where it can be demonstrated that two candidates are as qualified as each other to undertake the role in question, appointment to a female for example in preference to a male is justified where there is an underrepresentation within the existing workforce. This is in accordance with sections 158 and 159 of the Equality Act 2010. This particular approach does carry some risk and therefore selection decisions based on this approach should be well thought-out.

The policy highlights that exit interviews are a useful way to capture information to help improve future selection, retention of female staff and to identify/resolve any particular departmental problems which a female employee has felt unable to resolve sooner. The information gathered from exit interviews help identify any trends where females have been disadvantaged, excluded or discriminated against in the workplace. Although the Service will do everything to avoid these situations, this mechanism is a useful way to capture any cases where the Service could make positive changes that retain our talented females in the future. |
|---|---|---|---|
| **Likelihood** | **Impact** | **Overall** | |
| 1 | 3 | 3 | |
| Sexual Orientation (Gay, Lesbian or Bisexual) | | | There is no current evidence to suggest that a person's sexual orientation has any specific impact on sickness levels. Therefore, the Recruitment and Retention policy is not likely to have a negative impact on prospective or existing staff relating specifically to sexual orientation.

In terms of existing staff that identify as lesbian, gay, bi or pansexual, staff surveys consistently find that some of our happiest staff members are from the LGB+ community. This is a result of our investment in work around LGBT+ inclusion in recent years. The policy could include an example which states that our Service is the top performing organisation in the UK in relation to LGBT+ inclusion. |
Likelihood	**Impact**	**Overall**	
1	1	1	
Geography & Deprivation			In light of on-call recruitment, some areas find it more challenging than others to recruit staff into these specific roles. Although the Service may place more resource into different geographical areas when trying to fulfil vacancies, recruitment and selection is a fair and equal process as long

Likelihood	Impact	Overall	as prospective candidates can meet certain conditions (i.e. be located within the 5 minute from the station in order to respond to an emergency).
1	4	4	
On Call System or considerations for part time staff			This policy applies equally to all recruitment and selection activities undertaken within the Service for uniformed employees and non-uniformed support staff including permanent, temporary, casual and on-call employment.
Likelihood	Impact	Overall	
1	3	3	
Other community groups			We have no current evidence to suggest that marriage or civil partnership has an impact on the recruitment and selection process. Therefore, this policy is unlikely to have any specific impact to people where marriage or civil partnership is relevant.

Do any of the above criteria have a score of 12 and above and therefore need to move to a full equality impact assessment?

Yes ☐   No ☐

If yes, please contact the Equality and Inclusion Officer on 01606 868414 or e-mail benji.evans@cheshirefire.gov.uk to proceed with the full impact assessment.

If no, and any of the criteria has a score of between 1-5 or 6-10 what additional control mechanisms or amendments can you put into place to reduce the score even further? Please identify what the score will be after the control mechanism is in place.

What positive outcomes or changes will be taken as a result of any points identified by this impact assessment?

This EIA has highlighted good examples of where the Service are promoting equality and inclusion. There are some missed opportunities for the Service to showcase the excellent support they provide for their staff which can widen access for people with specific equality needs to join the Service and also retain them to have a long and fulfilling career once they are in Service.

Post initiative evaluation

Where applicable, please provide an overview (age range, gender, ethnicity etc.) of who attended the event(s), or were involved in or affected by the policy or initiative, and any relevant comments or complaints that were received in terms of equality and inclusion. The information should then be used to address any relevant concerns.

Before finalising, please return to equalities@cheshirefire.gov.uk for review by the Inclusion team.

Once completed please publish on Corporate Docs, CPS or return to equalities@cheshirefire.gov.uk