

Emergency Cover Review (ECR): Equality Impact Assessment Form

Equality Matrix and Scoring - the Integrated 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

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

		IMPACT					
		VL	L	M	H	VH	
		1	2	3	4	5	
LIKELIHOOD	Almost Certain	5	5	10	15	20	25
	High Probability	4	4	8	12	16	20
	Possible	3	3	6	9	12	15
	Low Probability	2	2	4	6	8	10
	Unlikely	1	1	2	3	4	5

Overall Risk Rating	Description	Monitoring
1 – 4 Manageable	The risk may be so low that the Service chooses to accept it and instead simply records 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 upon implementation.	The Project Lead will maintain oversight and continue to manage locally.
5 – 10 Medium	The EqIA owner will mitigate identified risks through slight amendments or implement further controls that reduce or eliminate the risk. Alternatively, the owner could confirm that all reasonable steps have been taken to mitigate the risk and no further reasonable action is possible.	
12 – 15 High	This policy, project or service cannot be rolled out until detailed external and / or internal consultation has taken place with those that this area of work affects.	Scores above 12 will require further action, at which point it is advisable to consult with the relevant project sponsor or Principal Officer.
16 – 25 Very High	High risks have been identified, so take immediate action. If legal action is likely, then the Service cannot go ahead with the policy without fundamentally changing it. If the impact remains severe even with this mitigation, then consultation with internal and / or external groups will have to take place.	

EQUALITY IMPACT ASSESSMENT FORM

Purpose

The Public Sector Equality Duty contained in section 149 of the Equality Act 2010 requires public authorities to have due regard to a number of equality considerations when exercising their functions. An Equality Impact Assessment (EqIA) is a tool that helps us to place equality, diversity, cohesion and integration at the heart of everything we do and make sure our strategies, policies, services and functions do what they are intended to do and for everybody. This Equality Impact Assessment (EqIA) ensures that the Service's policies, projects and provision do not unlawfully discriminate against any person, especially those who fall under protected characteristics as outlined in the Equality Act 2010. We need to ensure that all our strategies, policies, services and functions, both current and proposed, give proper consideration and due regard to the needs of diverse groups. This document sets out to identify any risk(s) to people and provides some description as to how the Service intends to mitigate such risk.

Title	Emergency Cover Review (ECR): Main consultation phase with considerations prior to strategic decision making.
Corporate objective being addressed	<p>Objective 1: To work towards making improvements to the health, safety and wellbeing of people in North Wales.</p> <p>Objective 2: To continue to work collaboratively to help communities improve their resilience.</p> <p>Objective 3: To operate as effectively and efficiently as possible, making the best use of the resources available.</p> <p>Objective 4: To continue to identify opportunities to encourage greater engagement with people, communities, staff and stakeholders.</p> <p>Objective 5: To maintain a suitably resilient, skilled, professional and flexible workforce.</p> <p>Objective 6: To develop ways of becoming more environmentally conscious in order to minimise the impact of our activity on the environment.</p>
Department / function carrying out the assessment	Planning, Performance and Transformation.

Who is responsible for the implementation of the policy?	North Wales Fire and Rescue Authority
Who is involved in the impact assessment process?	<p>Chief Fire Officer Dawn Docx Deputy Chief Fire Officer Stewart Forshaw Assistant Chief Fire Officer Helen MacArthur Assistant Chief Fire Officer Stuart Millington Area Manager Anthony Jones – Head of Planning, Performance & Transformation Group Manager Sandra Williams - Service Transformation Manager Station Manager Adam Leatham – Project Officer, Emergency Cover Review Tracey Williams – Head of Corporate Communications Bethan Millington – Deputy Head of Corporate Communications Rachel Corner - Deputy Head of Human Resources Natalie Jones - Welsh Language Officer Justin Evans – Head of Training and Development Benji Evans – Equality, Diversity and Inclusion Officer</p>
What are the aims / objectives / expected outcomes of the policy / initiative / service?	<p>The main outcomes of the consultation phase focused around capturing comprehensive feedback from internal and external stakeholders across North Wales concerning the consultation options and what they want and need from their fire and rescue service. The comprehensive engagement that took place during this Emergency Cover Review consultation explored public views on emergency fire and rescue cover across all geographical locations across North Wales, existing and new emerging risks and what people see as key priorities for the future.</p> <p>The initial mapping exercise helped identify a range of stakeholders which included different equality interest groups. Arrangements were made to engage with different groups across North Wales between Friday 21st July and Saturday 30th September 2023. This engagement enabled the Service to understand the potential risk of discrimination and any identified how risks could therefore be mitigated. This impact assessment also set out to identify to what degree risk of discrimination could occur regarding the different consultation options or parts of each option. This information can help inform The Authority decision making which meets the legal requirements set out in the Equality Act 2010, particularly section 149, the Public Sector Equality Duty.</p>
Who is intended to benefit from the policy?	Internal and external stakeholders.

Is the policy / initiative / service for external or internal purposes?	Internal and external.
Does this policy / initiative / service have an impact upon the On-Call duty service?	Yes, all stakeholders are directly involved in this consultation.
Are other organisations involved in the delivery? If so, please state which these may be.	<p>This equality impact assessment is focussed upon the discharging of duties and powers of fire and rescue authorities as set out in Part 2 of the Fire and Rescue Services Act 2004 (FRSA 2004) and other relevant orders made under Section 9 conferring additional responsibilities.</p> <p>Whilst the Authority seeks to establish partnership working with relevant stakeholders there are no organisations that are directly involved in the delivery of the above duties.</p>
What information / previous experience does the Service have, i.e. a similar initiative and what did this information tell us? (information 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).	Various staff within the Service have experience of public consultations. In addition, NWFRS has adopted the advice set by the Consultation Institute who have independently quality assured our processes, planning and engagement throughout the pre-consultation and consultation. The Service have benefited from data that is published by the likes of the Office of National Statistics, Stats Wales, equality charities, emergency incident data and other internal employment monitoring data relating to the workforce. The engagement with relevant stakeholders during the pre-consultation phase has provided vital insight into strategic partners, equality interest groups and the general public. The mapping exercise during the pre-consultation helped identify gaps and opportunities to ensure wider engagement with further ethnic minority groups as well as people across all age groups during the main consultation.
Has a similar impact assessment been conducted by other Fire and Rescue Services or local authorities in respect of a similar policy? If so – is it possible to adapt / incorporate their findings?	Yes, there have been similar EqlAs from other fire and rescue service’s public consultations. These have been shared with the Service to understanding previous practice and lessons learnt. For example, specific strategies to engage with the Muslim community to ensure people from seldom heard communities provide feedback. Previous EqlAs help us identify risk and we were then able to implement interventions that mitigate this risk. EqlAs from other public organisations helped reflect on their experiences and identify different considerations and our approach to public consultation.
Date of next review (if applicable)	This EqlA assesses risk throughout the consultation phase (21 July - 30 Sept). Data and insight captured within this EqlA helped inform post consultation and strategic decision making with regards to which option, parts of a particular option or a combination of options. Whichever option is agreed and implemented, mitigation of any identified risks of discrimination or inequality will need to take place.

Version control record	<p>Version 1 – 17/07/23 – Original draft</p> <p>Version 2 – 09/08/23 – Updated following initial desktop analysis</p> <p>Version 3 – 25/10/23 - Updated following the responses received and information heard throughout the consultation</p> <p>Version 4 – 01/11/23 - Updated following the responses received and information heard throughout the consultation</p> <p>Version 5 – 09/11/23- Updated following the responses received and information heard throughout the consultation</p> <p>Version 6 - 20/11/23 – Updated following discussion and feedback with TCI</p> <p>Version 7 - 22/11/23 – Formatting and layout amendments.</p> <p>Version 8 - 24/11/23 – Changes to the response to ‘who is involved’</p> <p>Version 9 - 27/11/23 – Amendment to response to question ‘which organisations are involved...’</p>
Completion date of this EqIA	Version 10 28/11/23 – Removal of submission instructions, title change and minor formatting.

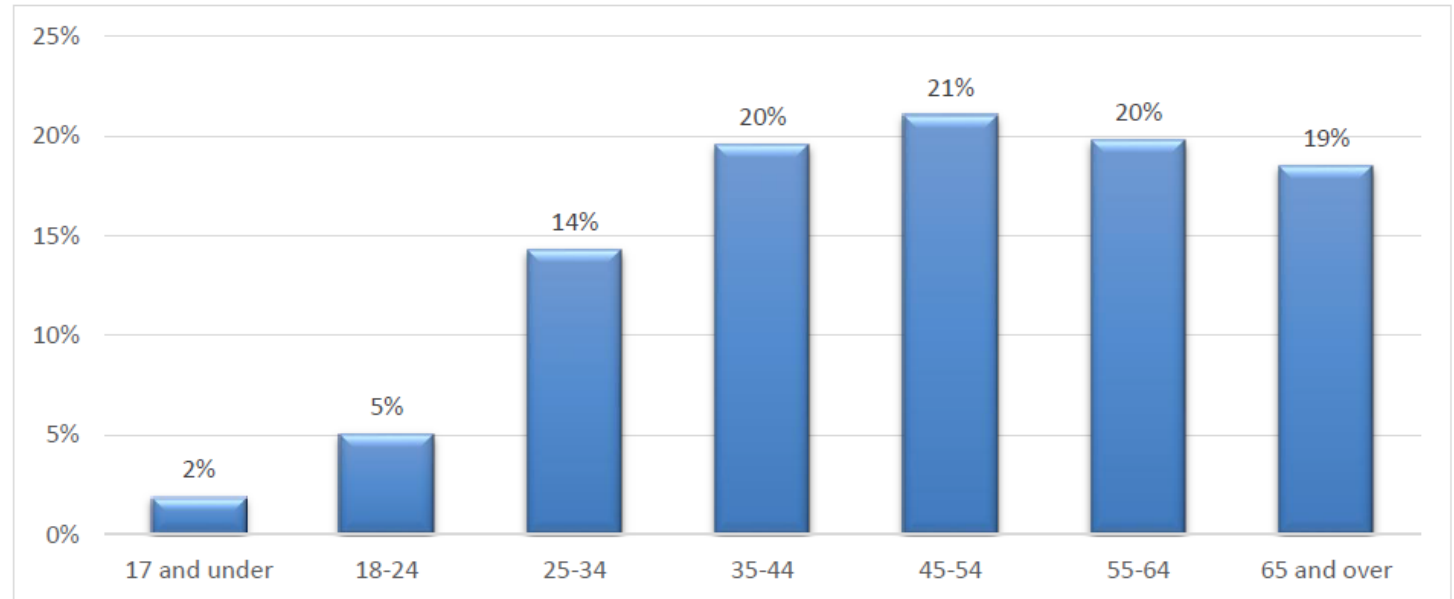
Equality Impact Assessment

Protected Characteristics or Equality Theme	This section will highlight potential risk of discrimination against each protected characteristic. Consideration will be given for intersectionality in some sections where relevant. The commentary will also include mitigation and how any identified risk will be reduced or eliminated.
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Age			
Likelihood	Impact	Overall	External Stakeholders
3	2	6	<p>The total population across North Wales is 687,000 (ONS, 2023a). The trend of population ageing has continued, with more people than ever before in the older age groups. The ONS (2023a) states that 22.3% of the population were aged 65 years and over. Out of all local authorities across Wales, Conwy (27.4%) and the Isle of Anglesey (26.4%) have the highest percentages of people aged 65 years and over. Conwy (1.5%) has the highest percentage of people aged 90 years in Wales.</p> <p>With intersectionality in mind, it is useful to explore disability and age due to a notable difference in the data between 2011 and 2021, particularly in the younger and older age groups (ONS, 2023b). For females aged 15 to 19 years, the percentage of disability was 13.3% in 2021, 8.1 percentage points higher than in 2011 and 7.9 percentage points higher than in 2001. This trend continued into the 20- to 24-year age group, where disability prevalence increased substantially, from 6.2% in 2011 to 17.9% in 2021. For males, the increased prevalence of disability in 2021 began at earlier ages; 8.6% of males aged 5 to 9 years were disabled in 2021, compared with 5.6% in 2011 and 6.5% in 2001 (ONS, 2023b).</p> <p>During the consultation, the Service received 1,726 responses which can be broken down to 1,500 online and 226 paper-based. People across all age groups provided feedback and the response can be viewed as reflective of North Wales. In terms of age, responses of people responding can be broken down into the following age categories Under 17 (2%), 18-24 (5%), 25-34 (14%), 35-44 (20%), 45-54 (21%), 55-64 (20%) and 65+ (19%). Through the 17 equality interest focus groups that were organised, people across all age groups were engaged, but also people that fall under more than one protected characteristic.</p>

The table below provides an outline of the age range of the respondents:

Chart 3.1.4.1 – Age - Which age group are you?



Base: all respondents excluding 'no response' (1,416)

Overall, two-thirds of respondents (68%) agreed that Option 1 met the needs of their communities. Feedback during the public consultation sessions found that comments such as 'jobs being protected', 'Closest to current model', 'safest option' and 'no station closures' emerged. Nothing directly related to age was raised emerged within the questions relating to each option, although there were various general comments such as 'puts lives at risk', 'increases in response times', 'cover is reduced' and 'increased risk at night-time'.

One specific question in the questionnaire asked 'Are there any other equality issues that we could be thinking about?' and 1,302 people (76% of total respondents) provided no response or answered 'No, none or nothing'. There were ten respondents that stated 'older people' and five respondents that stated 'young

		<p><i>people or youths</i>’ without providing any specific details to how these people experience inequality or ‘equality issues’.</p> <p>During the equality focus groups, people aged 55 and above made up 39% of the respondents and their feedback did provide some specific insight. Some concerns relating to older people being less mobile and less likely to escape in a developing fire was raised at different groups. This emphasised some concerns around what some older people perceived to be ‘reduced fire cover’ in specific locations such as Deeside, Conwy, Holywell and Wrexham where a slower response could be fatal for an older person.</p> <p>Midway through the consultation, it was identified that not many people aged 25 and under were engaging in the consultation sessions or completing the online questionnaire. As a result, the Equality, Diversity and Inclusion Officer organised focus groups at various youth groups and colleges in Wrexham and Flintshire, although it can be acknowledged that some students live in Denbighshire. University freshers’ fairs were also used to engage with youths and young adults which saw over 250 people engaged by the end of the consultation.</p> <p>The Service received feedback from a group of older people that were unable to attend the public engagement event in Conwy and they were unable to access the online questionnaire. To widen access, the Service organised a specific focus group in partnership with the ‘Brew and Biscuit’ Group in Llandudno Junction. Officers attended and helped capture feedback from 28 older people by supporting them to complete online and physical copies of the questionnaire. Various equality focus groups were organised with older people throughout the consultation period to widen access for those who were unable to attend the public engagement events, but also ensure feedback was captured from people who are digitally excluded.</p> <p>Concerns were raised at the Wrexham Islamic Centre Youth Group and there was a strong feeling that many ‘elders’ and older members of the Muslim community were at risk, mainly because of their limited mobility. Feedback suggested that some older people in this community face additional challenges because Welsh or English is not their first language and due to different cultural practices, they may not be taking appropriate preventive measures. To mitigate this risk, the Service the offer Safe and Well Checks and other fire safety interventions which can be promoted to reassure the Muslim community.</p> <p>Responses to the question ‘<i>Do you feel there are any other risks we should be considering or planning for?</i>’ included many different themes. Specific to age, respondents stated ‘<i>Ageing population</i>’ on 13 occasions with the main concern centring around the increasing risk of people falling and becoming less independent, thus at an increased risk in a domestic fire. To mitigate this risk, arrangements will be made for fire safety to meet with the respondents and there is scope for Safe and Well Checks to be conducted. Group visits can be organised to widen access and this engagement can also reinforce the messages that</p>
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			<p>the Service has specific teams of staff that actively engage with the community and not all non-operational activity is completed by operational firefighters.</p> <p>Specific concerns relating to access emerged in the main public consultation session in Conwy. Similar issues were raised in one focus group with older people in Llandudno Junction which centred around many older people living in older buildings with narrow access and limited parking. There were also concerns around the 20mph speed restrictions which respondents felt would adversely impact on the fire and rescue services ability to respond to fire. It was communicated to respondents attending the focus groups that, to some degree, our Service can legally break the speed limit. This is the case when responding on blue lights and exceeding the speed limit where is deemed safe enough to do. This information did help ease some concerns around response times, although some older community members felt response times would still be too slow if fire engines were coming from further afield [If Conwy Fire Station was to close]. To ease concerns around blocked access because of illegal parking, the Service promotes awareness campaigns to encourage people to avoid parking on yellow lines and on opposite sides of the roads which can restrict access, especially on narrow streets. Awareness campaigns of this nature can help nudge good behaviour which enable fire engines and other fire vehicles to pass safely and gain access when responding to emergencies. There are situations where the responding fire appliances may not be mobilised from the nearest fire station. For example, where the nearest fire appliances are already engaged at another incident. The Service will always send the nearest available resource.</p>
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Likelihood	Impact	Overall	
3	4	12	<p>Internal Stakeholders</p> <p>Firefighters that provided feedback as part of the internal focus groups highlighted several concerns relating directly or indirectly with age. There were several firefighters that referred to fatigue and the potential impact of working longer hours when increased travel times are considered. Feedback suggested working longer hours will negatively impact all firefighters, but particularly older firefighters that may have to travel from Deeside and Rhyl to places like Porthmadog, Dolgellau and Corwen. Older female firefighters felt having to travel further away to work from where they live will have a greater impact because they are more likely to have children. This assessment highlights multiple people having concerns around their individual situations. To mitigate these concerns, firefighters (regardless of age) that are involved with any relocation process would have an opportunity to state their preferred work locations and although this cannot be guaranteed, every effort will be made to accommodate requests.</p> <p>With intersectionality in mind, half of the firefighters that provided feedback felt travelling longer distances would have a greater impact on firefighters that experience extreme menopause symptoms. Menopause usually occurs between the ages of 45 and 55, but it can happen earlier (NHS, 2022). Menopause has an adverse impact on one's physical and psychological wellbeing. Comprehensive coverage has been provided for Menopause and other types of disability within the Disability section of this EqIA. To mitigate risk, the Service have relevant policies in place to provide support and reasonable adjustments for staff. Also, it is important to note that the Service has recently developed a menopause policy and training will be provided to staff to help promote inclusion.</p>

Disability			External Stakeholders
Likelihood	Impact	Overall	

3

2

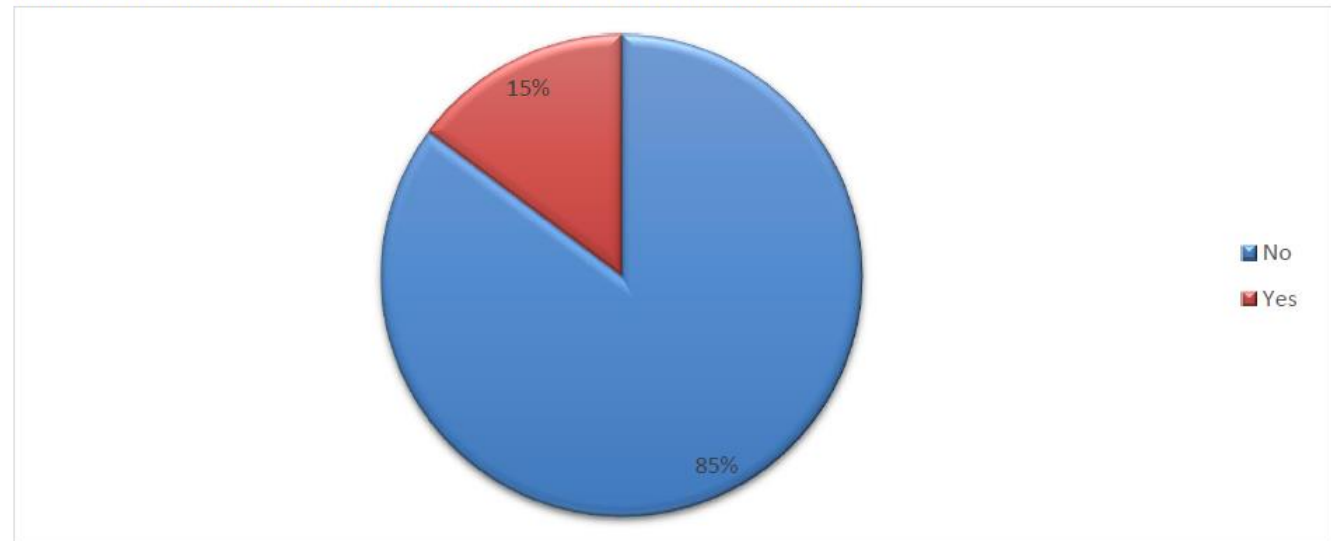
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According to ONS (2023c), 21.1% of the population have a disability and/or long-term health condition. Although, Gwynedd (18.1%) is one of the local authorities with the lowest proportion of disabled people in Wales, the average percentage of disabled people across North Wales region is higher than other parts of the UK. With intersectionality in mind, 22.3% of females and 19.8% of males were disabled. The percentage of those who were limited a little was 11.9% for females and 10.3% for males. A higher proportion of females than males indicated that they were limited a lot; 10.4% and 9.5% respectively (ONS, 2023b).

During the consultation, comprehensive feedback from people with a disability and/or long-term condition was captured through the public engagement events and via some additional equality focus groups that were organised with partners Headway Conwy and Denbighshire, Holywell Dementia and Older Peoples Group, Ynys Môn Older People and Brew & Biscuit Group in Conwy.

15% of respondents (excluding 308 who stated 'prefer not to say') stated they have a disability which is representative of North Wales. This can be seen in the chart below:

Chart 3.1.4.3 – Disability – Are you disabled or have a long-term health condition?



Base: all respondents excluding 'no response' (1,392)

			<p>Within the main consultation questionnaire, respondents mentioned ‘ageing population’ on thirteen occasions with concerns linked to ability to escape a fire and potential falls which can increase the risk of people experiencing an injury, limited mobility and placing people in a situation where they can live independently which are all markers that the Service use to measure risk to fire in domestic dwellings. The NHS (2021) point out anyone can have a fall, but older people are more vulnerable and likely to fall, especially if they have a long-term health condition. Falls are a common, but often overlooked, cause of injury. Around 1 in 3 adults over 65 and half of people over 80 will have at least one fall a year.</p> <p>There were fifty respondents that stated ‘increasing population’ as an emerging risk. Fire incidents data tells us that there is no direct correlation between an increasing population (which will include people across all groups and disabilities) and increased fire risk due in part to new properties being built to higher fire standards which include multiple preventative measures.</p> <p>During the public engagement events and equality focus groups, people raised concerns with access issues and the impact of the new 20mph speed limit needed to be considered. As discussed in the age section, there was particular reference to narrow streets and limited access to properties in Conwy and other locations such as Deeside, Holywell and Wrexham. Respondents were concerned about older people, especially those with limited mobility as a result of a disability and long term health conditions. Specific feedback from representatives at Autistic UK explored how the Service was capturing feedback from autistic and other disabled people, along with interest in how many autistic staff the Service has, and how services such as Safe and Well Checks are delivered to autistic people. It was explained to the respondents that have connected and will continue to connect with autistic and other disabled people through relevant charities and community partners that have established relationship with the people we are targeting. It was communicated that currently around 123 (Which equates to 13.4%) of our workforce have disclosed a disability, but this figure is likely to be higher because some people choose not to tell their employer, plus some people are waiting on an official neurodiverse diagnosis and various health conditions. It was explained that although some firefighters have already received Autism Awareness training, all firefighters will have received this training by 31 March 2024.</p>
Likelihood	Impact	Overall	

3	4	12	<p>Internal Stakeholders</p> <p>Firefighters that provided feedback as part of the internal focus groups highlighted several concerns relating to a disability, but also situations which could adversely impact on their physical and mental health, thus potentially leading to a long-term health condition(s).</p> <p>Some firefighters felt the potential of travelling further distances across North Wales may result in them feeling bored, having poor posture and poor recovery following busy shifts. To ease these concerns and to promote best practice regarding of the outcomes of this consultation, the Service’s Health, Wellbeing and Fitness Advisor has provided some advice specific relating to safe and preventative driving habits.</p> <p>With intersectionality in mind, many firefighters felt travelling longer distances would impact more on female firefighters, especially ones that experience extreme menopause symptoms which can impact on physical and psychological wellbeing. Performance and concentration, increased risk of fatigue, mood, self-confidence, sleep and many other things. To mitigate any potential risks, firefighters that are involved with any potential relocation of firefighters to ensure they have an opportunity to state their preferred work locations and although this cannot be guaranteed, every effort will be made to accommodate requests. With regards to reasonable adjustments, usually inclusive practices will be adopted in line with the Service policy to support any person with a disability or long-term health condition (i.e. Menopause Policy, Modified Duties, Reasonable Adjustments and Phased Return to Work Policy).</p> <p>Eight firefighters disclosed what can be described as caring responsibilities. Five firefighters disclosed that their partners or immediate family members experience symptoms as a result of diabetes, epilepsy, menopause and mental health. More than one firefighter has a child that has been diagnosed or has suspected autism and developmental disabilities which can present situations where ‘only a parent’ can manage and provide appropriate support. Although respite provisions are available, there was concern that the usual one or two days every eight weeks that is on offer is not considered enough. Potential changes to duty systems may have a sufficient impact on a firefighter’s ability to share parental and caring responsibilities with their partners. Due consideration for these specific needs will be given during any potential relocation process.</p> <p>One firefighter stated their partner has been unwell impacting their ability to work. This has reduced their household income and the firefighter’s salary has become the main source of household income. The firefighter advised that travelling further afield would impact their ability to support childcare and</p>
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			<p>their partner's ability to work, potentially preventing them working altogether. The relocation process will involve consultation, so reasonable adjustments can be considered to eliminate or minimise any potential adverse impact(s) where possible.</p> <p>One firefighter disclosed that they have a caring responsibility where they look after a family member who has a chronic condition. This firefighter was concerned about their reduced ability to provide care if they have to change duty systems and/or location. Any potential relocation process would involve consultation, so firefighters in this position or similar position would have an opportunity to explain their situation which will enable the Service to eliminate or minimise any potential adverse impacts where possible.</p> <p>Two firefighters raised similar concerns where a potential change of duty system or change of workplace location may result in them having to seek alternative employment because of potential caring responsibilities of older family members in the near future. Potential relocation of firefighters would need to be carefully managed to mitigate any risk and based on a case-by-case basis although, it must be acknowledged that there is a difference in 'potentially' caring for someone in the future and currently 'caring for someone'. Any firefighters that could be involved in a relocation process will have the opportunity to raise their changing circumstances. This dialogue would enable the Service to show due regard and make a fair evidence-based decision at the appropriate time to avoid any risk of discrimination by association.</p>
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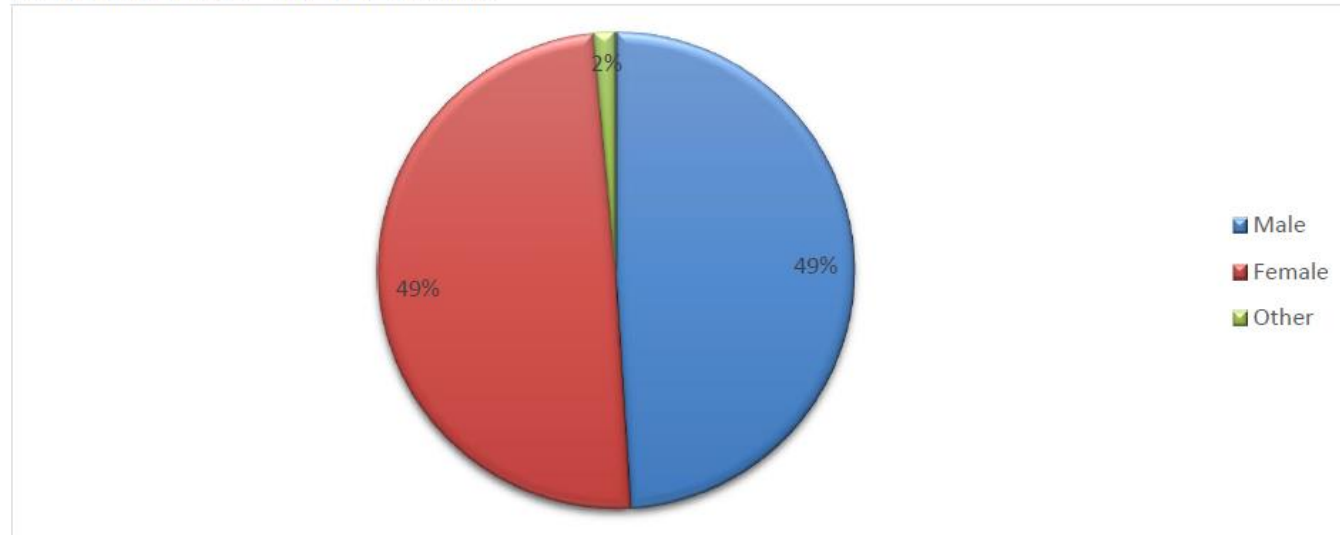
Mental Health and Wellbeing			External Stakeholders
Likelihood	Impact	Overall	
4	3	12	<p>Although mental health falls under the definition of disability, this has been separated as it can occur naturally during a project of this nature. Mental health and wellbeing considerations cover a broad group of people that experience low mood, stress, anxiety, depression. To ensure the Service captures the impact and potential impact on the emergency cover review on its people and the public, comprehensive engagement was conducted with stakeholders.</p> <p>The consultation questionnaire included specific questions which explored public feedback on our workforce in terms of actual and perceived impact of changes on our staff. One question ‘<i>Which decision-making criteria is most important to you?</i>’ was useful for capturing the public’s views of what they view as a priority. Although only 3% of respondents stated ‘<i>Workforce</i>’ as their top priority, it was listed as the third most popular second choice and most popular third choice.</p> <p>Commentary from 155 respondents (just over 10%) was noted concerning workforce wellbeing with specific reference to the value of retaining an efficient and well-trained workforce. There was reference to the importance of having high morale, maintaining work-life balance and specific mention to how it is unfair for the Service to make massive changes to workplace conditions and travel times. Respondents took the opportunity here to discuss the impact of the proposed options on staff wellbeing, with the impacts upon employees and their families raised. The need for a work / life balance, support for staff who may have to relocate and the potential negative impacts from changes in shift patterns were discussed, with several respondents referring to fair pay for public sector workers.</p> <p>68% of respondents either strongly agree or agreed that Option 1 would meet the needs of our communities. It is important to note that Option 1 does not involve a reduction in firefighters. Job insecurity has been a contributor towards adverse mental health and wellbeing in the public sector in the past (Felstead et al, 2017; Flint et al, 2013; Gallie et al, 2017). Although, mental health was raised by some respondents throughout the consultation, a large majority of the comments relating to adverse mental health and wellbeing was in connection with to Options 2 and 3. The consultation provides evidence that the public clearly feel Option 1 provides the best emergency fire cover from the available options. There is some evidence that the public feel Option 1 has the least adverse impact on staff mental health and wellbeing and specific comments referring to Option 1 resulting in no fire station closures which ultimately protect firefighter jobs which was seen as a huge positive. In contrast, the feedback also suggests that Options 2 and 3 were not supported for many reasons including ‘<i>job losses</i>’ and ‘<i>staff numbers reduced</i>’ which could negatively impact on firefighters’</p>

			income and financial wellbeing. It is important to note that although the public may perceive the adverse impacts of implementing Option 1 to be low, consultation with our staff does suggest the impact could be greater. Further details are provided in the next section titled 'internal stakeholders.
Likelihood	Impact	Overall	
4	3	12	<p>Internal Stakeholders</p> <p>Firefighters from Deeside, Rhyl and Wrexham felt any increased travel time, on top of a busy shift, could adversely impact their physical and mental health. According to the feedback received, mental health and wellbeing was the biggest area of concern. 35 out of 37 firefighters referred to experiencing adverse mental health as a direct result of the consultation process and the uncertainty of what the future holds for them. The Service recognises that with change comes uncertainty which can be challenging for those involved and has signposted staff to relevant support mechanisms throughout this process. It is noted that, to date, no issues have been raised with HR Specialists from internal stakeholders in relation to concerns surrounding the process.</p> <p>Specifically, firefighters at Deeside and Rhyl are anxious and worried about the possibility of changing duty systems and/or moving workplace location, which could result in increased travel, less recovery time and spending less time with their partner/children/family. To a lesser degree, firefighters at other locations including Holyhead, Llandudno and Wrexham also raised concerns about the potential of being asked to move locations because of a potential 'ripple effect' of the Service needing to 'accommodate' firefighters from Deeside and Rhyl. These potential risks will be mitigated as far as possible through the management of relocation process.</p> <p>As part of this process, firefighters will be able to inform the Service of their preferred location, whilst this cannot be guaranteed, and every effort will be made to accommodate individual needs. Firefighters involved in any relocation of workplace will be able to highlight their individual situations which will enable the Service to consider the impact on them and mitigate risk where possible. To support firefighters at this time, members of the Service Leadership Team have visited the affected fire stations to communicate and update firefighters about the decision-making process and relevant support mechanisms have been highlighted to staff.</p> <p>In terms of physical and psychological health firefighters raised concerns. They referred to increased travel time meaning they would have 'less recovery time', '<i>It [Travelling] gets boring driving extra miles and navigating traffic on busy roads</i>', '<i>Sat in the car too long is not good for your posture</i>'. In response to the recognised link between driving and fatigue, the Service's Health, Wellbeing and Fitness Advisor has previously provided some specific advice and top tips to staff. Other advice relating to fitness, healthy lifestyle, sleep rest and preparing for safe driving has been promoted as part of an annual cycle of promoting good healthy practices. In September, a 20mph</p>

			<p>speed restriction was implemented in Wales and many firefighters felt this reduced speed limit would increase travel times to the workplace even more.</p> <p>Some firefighters highlighted that the proposed changes could reduce their ability to maintain a healthy social life which could adversely impact mental health. One group collectively agreed that potentially working 'extended work hours can impact my physical and mental health, it is vital to manage and take care of yourself and I feel this may become compromised. We [firefighters] made a sacrifice to miss out on lots of social activities when we signed up, but the little social time that we have built around our busy shift patterns is not good. Changing schedules can affect our ability to participate in social activities or spend quality time with friends and loved ones'. Concern was raised in relation to mental health. To ensure the Service makes fair decisions regarding the relocation process, individual circumstances would be duly considered to minimise impact where possible.</p>
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Gender			External Stakeholders
Likelihood	Impact	Overall	
4	1	4	<p>According to ONS (2021a), the North Wales population is evenly split across females (51.1%) and males (48.9%). Although engagement with males and females will occur organically through contact with different equality interest groups, some specific gender-based organisations enable us to connect with gender groups with specific needs (e.g. older people, unemployed, parents, victims of domestic violence).</p> <p>The Service works in partnership with various charities (i.e. North Wales Women's Centre) who are well connected with women across North Wales. This has helped establish strong connections with different gender groups across all age groups via various community groups, youth clubs, place of worship and education institutes that we worked with to capture comprehensive feedback. The gender breakdown of the respondents can be seen in the chart below:</p>

Chart 3.1.4.2 – Gender - How do you identify?



Base: all respondents excluding 'no response' (1,398)

Concerns were raised at one of the equality focus groups regarding potential changes to the duty system and shift patterns likely to have a greater impact on women with this group of people often the primary care givers and parents. Concerns were raised for the existing female workforce, but also the workforce in the future with the potential for the duty systems discouraging females off from joining. Further research could be conducted to explore this further. A public perception survey with people across different age groups could help investigate this further. The Service has recently conducted a Fire Family staff survey reporting in October 2023 and the feedback from this can also be used to inform this issue.

Specific reference to gender imbalances in terms of females being the primary carer for children and others requiring care. This has been covered in more detail in 'Pregnancy and Maternity' and 'Socio-economic status' sections. The latter section helps cover topics such as costs associated with being a carer under what is known as community of place and community of interest. Due to intersectionality, other considerations relating to different gender groups (i.e. people who live alone) have been captured in other sections of this EqIA.

Likelihood	Impact	Overall	
3	3	9	Internal Stakeholders

	<p>Some staff commented that female firefighters could be disproportionately affected by a potential duty system change at Deeside, Rhyl and Wrexham. Six out of the ten female firefighters that provided feedback said they are the primary carer for their children and stepchildren. Two firefighters said they share parental responsibilities 50/50 with partners who have 'rigid' jobs which have been built around the firefighter's work including initial training and the various work locations once they were posted out on station. However, sixteen male firefighters also raised concerns about their ability to parent and provide childcare which suggests the ability to parent could impact firefighters regardless of gender.</p> <p>It was apparent during the internal focus groups that many male firefighters are co-parents on an equal basis and their partners have employment in different sectors (including fire and other public sector organisations). Feedback suggests that the wider public sector does not provide much flexibility to accommodate a change to a firefighter's duty systems and one firefighter explained that '<i>Some firefighters have partners who work for the NHS, Health and Social Care etc, you can't just expect them to change their work patterns to accommodate us [firefighters], it doesn't work like that</i>'. The number of male firefighters raising 'childcare' as an issue clearly demonstrates that all genders may be impacted by potential changes to duty systems and locations and not solely an issue for females.</p> <p>In total, 22 firefighters disclosed they have children with 12 of them having two or more children. Two have children living with them on a 50/50 split basis having separated from their partners, indicating that any changes to routines could be unsettling. Potential changes to duty systems and/or change to workplace locations may have a detrimental impact onto some parents. The potential relocating of firefighters would provide an opportunity for them to explain their specific situations and needs would be carefully managed to ensure any risk is mitigated to eliminate or minimise any adverse impact(s). Childcare costs were indicated as a concern for firefighters on all sites, but this has been discussed in detail within the socio-economic status section of this EqIA.</p>
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Pregnancy and Maternity			External Stakeholders
Likelihood	Impact	Overall	
2	3	6	<p>A number of pregnant people and people on maternity leave were engaged with during the public engagement events and the equality focus groups. No equality issues that specifically relate to pregnancy and maternity emerged from the feedback received.</p> <p>Partners that helped us connect with this target audience included the North Wales Women's Centre, North Wales Pride, Bangor and Wrexham Universities plus others. Although nothing</p>

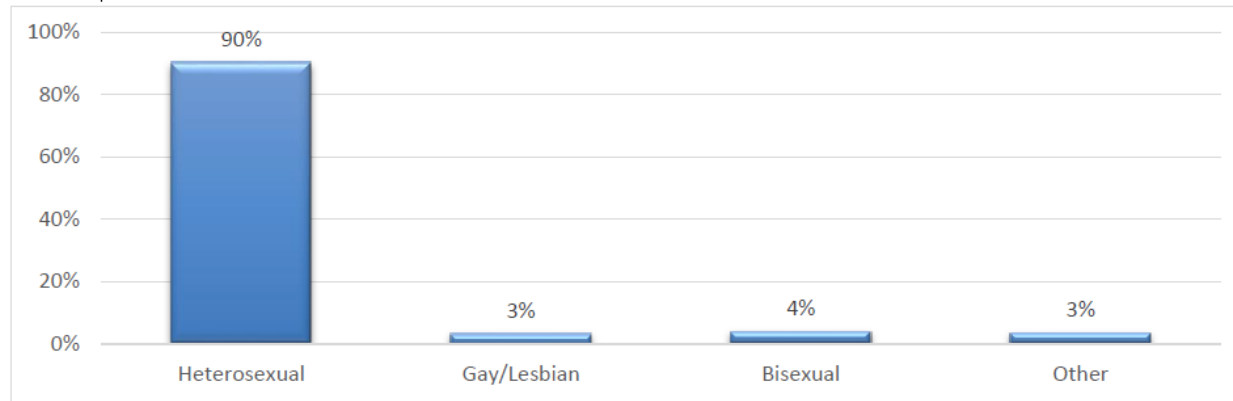
			specific relating to pregnancy and maternity emerged, some students at Bangor and Wrexham Universities felt the duty system in Option 1 was attractive compared to the '9 to 5' office hours that they currently work or have previously worked. Although some students, university staff and people that provided feedback at other equality focus groups felt that Option 1 fails to offer enough flexibility, especially if you consider a family with a new baby to look after.
Likelihood	Impact	Overall	
3	3	9	<p>Internal Stakeholders</p> <p>Male and female firefighters that didn't currently have children, but aspired to one day have their own family felt that potentially travelling the extra distance across North Wales to new Wholetime stations in Dolgellau and Porthmadog could create a barrier for retaining and recruiting talented people in the future. Although there is no evidence at this stage, firefighters felt that all three options (if implemented), had the potential to negatively impact on the Service's ability to recruit young parents, especially women in the future. The feedback suggested the main reasons focus around lack of work/life balance, inability to do the school run, increased travel times, living temporarily in other areas would make it impossible for a 'new mother' to be a firefighter and childcare costs would be too high for someone on a new recruit's salary. One group highlighted that many people have moved away from different parts of the UK to become a firefighter in North Wales, so they don't have family members near-by to help with childcare, so the Service would need to consider how any potential changes in duty systems or other changes that could potentially result in female firefighters deciding to leave the Service.</p> <p>To mitigate these concerns, firefighters that are involved with any potential relocation of workplace would have an opportunity to state their preferred work locations and whilst this cannot be guaranteed, every effort will be made to accommodate requests for staff to be located as close as possible to where they live. Naturally, careful consideration is always given to pregnant staff, those on maternity leave as well as people who have recent returned from maternity leave to help ease them back into the workplace. The Service recognises that all individual needs and aspirations should be considered for all firefighters involved in any relocation process.</p>

Gender Re-assignment / Identity			External Stakeholders
Likelihood	Impact	Overall	
3	1	3	<p>The exact number of transgender and/or non-binary people in North Wales is unknown. However, Stonewall (2022) estimates between 0.5% and 1% of the population is transgender and/or non-binary which give us some kind of indication who we needed to engage with during the consultation. The Service connected with many transgender and non-binary people through the equality focus groups and feedback can be deemed comprehensive and representative.</p> <p>Several themes emerged during the consultation, but only a small number that specifically related to potential barriers that could impact transgender and/or non-binary people. The Unique Transgender Network demonstrated an interest in prevention work and wanted to understand more about North Wales Fire and Rescue Service's engagement with the community and with other equality groups. The main area of concern that emerged in different focus groups was the perception that any reduction in staff could negatively impact on the Service's ability to attend Pride and other community events and conduct important prevention work. There were concerns surrounding potential closure of fire stations, with particular concern for Conwy station. There were specific concerns for the proposed duty system changes at Deeside and Rhyl and the removal of the third fire appliance at Wrexham was raised at all three focus groups that the Service organised in partnership with Unique Transgender Network.</p> <p>It was explained to people that raised this concern, that the Service has several dedicated departments that conduct non-operational activity. For example, the Fire Safety department completes a great deal of the Safe and Well Checks (i.e. fire safety in the home), fire safety audits in business settings, fire safety in education settings to name a few. Operational firefighters conduct a percentage of the Services overall community engagement. However, Option 1 proposes new Wholetime cover in Corwen, Dolgellau and Porthmadog which would increase the Services capacity and ability to engage with transgender and the wider community to undertake (i.e. Safe and Well Checks in the home) in these key strategic locations, thus adding social value.</p>
Likelihood	Impact	Overall	
1	1	1	Internal Stakeholders

			<p>The Equality, Diversity and Inclusion Officer liaised with the Service's FirePride LGBTQ+ Staff Network during the pre-consultation phase to identify any potential concerns and nothing emerged. During the main consultation, nothing directly relating to transgender and/or non-binary people emerged in the internal focus groups. Therefore, risk can be deemed low.</p>
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Sexual Orientation			External Stakeholders
Likelihood	Impact	Overall	
4	1	4	<p>Stonewall estimates between 5-7% of the population are lesbian, gay, bisexual or another sexual orientation which is other than heterosexual (See NHS, 2015). Stonewall (2022) has published more recent reports which suggest younger people are more likely to be open about sexual orientation and gender identity. North Wales has a growing LGB+ community and the emergence of new pride events, support groups and staff networks in the workplace means that engagement with this audience is more meaningful than previous years. With intersectionality in mind, it is useful to know the age profile of people who identified as LGB+ which tends to be younger than the overall population. More than half of those who identified as LGB+ (57.9%) were aged between 16 and 34 years (ONS, 2021d). In contrast, less than a third of the overall population were aged between 16 and 34 years (29.6%). This intelligence helps our service know who to engage.</p> <p>To ensure the Service was able to reach out and capture the needs of people across different sexual orientations, a comprehensive mapping exercise was conducted as part of the pre-consultation to engage with key partners. Engagement with the wider LGBTQ+ community was achieved through effective partnership working with various LGBTQ+ charities and support groups that enabled the Service to capture comprehensive feedback. The Service also engaged with people at the Colwyn Bay Pride event which took place during the pre-consultation period and at North Wales Pride which took place the day before the consultation was launched.</p> <p>10% of the respondents (see table below) identified as LGB+, excluding those who 'no response'.</p>

Chart 3.1|4.4 – Sexual Orientation?



Base: all respondents excluding 'no response' (1,275)

Informal discussions with the wider LGBTQ+ community suggested they welcomed the efforts of the Service to engage and consult with them. There was no feedback which suggests this community will be directly or indirectly impacted by the proposed changes. The views of the LGB+ community did not differ from people who identified as heterosexual or straight. Option 1 was their preferred choice, there was opposition for Option 2 and strong opposition for Option 3. This feedback can be deemed comprehensive and representative of the LGB+ community in North Wales.

Likelihood	Impact	Total	
2	4	8	<p>Internal Stakeholders</p> <p>The Equality, Diversity and Inclusion Officer liaised with the Service’s FirePride and LGBTQ+ Staff Networks during the pre-consultation phase to identify any potential concerns and nothing emerged at this stage. During the main consultation, some concerns did emerge within the internal focus groups.</p> <p>Feedback identified themes surrounding parenting, childcare and caring responsibilities. It became apparent during the focus groups that some people in ‘same sex’ relationships encounter complex challenges surrounding having children (i.e. IVF), adopting children and childcare.</p>

			<p>Firefighters highlighted that some LGB+ people are made to <i>'jump through hoops'</i> when adopting children and they often have to attend extra appointments to <i>'check their suitability'</i>. It was also highlighted that some LGB+ people were disowned by their families when they <i>'came out'</i>, so there are often <i>'no family members around to help with childcare, so there does need to be some consideration about moving firefighters to other locations because the impact can be huge'</i>. Some firefighters highlighted challenges in terms of processes and many appointments that relate to adoption and IVF and that these should be considered for all staff, but also for people thinking of joining the fire Service in the future. One Firefighter said, <i>'If we are serious about inclusion, this is the level you need to go to widen access and people will join and stay if they are looked after'</i>. Firefighters expressed concern about the ongoing issues of not knowing what is happening, resulting in increased stress levels caused by the Emergency Cover Review, but the impact of not being able to attend appointments (i.e. IVF, adoption plus others) should they potentially be required to work further away from where they live. The Service has a policy in place with regards to support staff attendance at appointments relating to pregnancy and IVF. There were various concerns raised that could negatively impact on LGB people and it is recognised that any relocation process needs to consider their needs to help mitigate risk and minimise the impact.</p>
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Marriage or Civil Partnership			<p>Although marriage and civil partnership is not covered within the Public Sector Equality Duty, North Wales Fire and Rescue Service still wanted to show due regard for this protected characteristic based on fact that people who are 'single' may be place at a disadvantage as a result of the proposed changes.</p> <p>External Stakeholders</p>
Likelihood	Impact	Overall	
2	1	2	

			48.1% people aged 16 and over are married or in a civil partnership (Stats Wales, 2020). Although this is a sufficient group of people, there are no identified risks specific to marriage and civil partnership at this stage. During the pre-consultation phase and initial mapping exercise, the Service felt it would organically connect with people that are married or in a civil partnership so was confident in capturing comprehensive feedback. Therefore, it was not deemed appropriate to target people as a result of their relationship status. During the consultation, nothing emerged in any of the public consultation sessions or equality focus groups that was of any concern with regards of a person's relationship status. Therefore, risk can be deemed low.
Likelihood	Impact	Overall	
3	3	9	<p>Internal Stakeholders</p> <p>Although there were no concerns from an external perspective, it should be acknowledged that internal stakeholders did raise several concerns which require consideration. Thirty of the thirty-seven firefighters that provided feedback at the internal focus groups raised concerns that had a direct or indirect impact on their partner or ex-partner where children are concerned. This section of the EqlA enables us to investigate one's 'relationship status' in detail where the impact on the proposed changes can be explored. Relationship status intersects with other protected characteristics including sex and gender, sexual orientation, disability and others. For example, in terms of gender, females are often the primary carers for children, so the impact of the proposed changes could have a greater impact on females when compared to male firefighters. 90% of single parents in the UK are female (Gingerbread, 2019) which suggests changes to duty systems and work location may have a greater impact on some female firefighters if they are a single parent. This may not be the case and some people have good childcare provision in place or family members to help with childcare, but this insight enables us to consider the potential risk.</p> <p>When you consider a person's legal relationship status the intersection with different protected characteristics is important. For example, take sexual orientation, 68.8% of people that identify as Lesbian, Gay or Bisexual (68.8%) are more likely to be single, compared to 34.4% of people that</p>

			<p>identify as heterosexual or straight (ONS, 2019). This type of data analysis can really help the Service to better understand how some people are more likely to be single or even live alone. Some people who are not in a relationship or live alone will only have one income, therefore they could be more likely to experience financial hardship. Financial considerations will be explored in far more detail in the socio-economic status section of this document. Any firefighters that will be involved in a relocation process may benefit from being open and transparent about their relationship status and this information can help ensure all their individual needs are given due consideration (and potential impacts are considered) and this can inform decision making.</p>
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Religion and/or Belief		
Likelihood	Impact	Overall
3	2	6

External Stakeholders

The Service acknowledges that North Wales is a diverse region with regards to people’s religious affiliations, belief systems and those who are not religious or align to any belief system. Christianity is the largest religious group (46.3%). The next largest religious affiliation is Muslim (2.2%), and other religions include Hindu (0.4%), Buddhist” (0.3%), Sikh” (0.1%) and Jewish (0.1%). Other listed religious groups include Pagan (0.2%), Spiritualist (0.1%), and Spiritual (0.1%). There is no reference to the Bahai religion in the official data, but we wanted to include this small religious community because staff from the Service have worked closely with several people that align to ‘Bahai’ and they have been actively involved with the consultation via the North Wales Interfaith Forum and Bangor Interfaith Group. The number of people in North Wales reporting “No religion” was larger than those reporting any individual religious affiliation, with 46.5% of the population (WG, 2022b). This latest census data indicates approximately half the North Wales population have religious affiliations, so places of worships and faith-based organisations provide a logical platform for us to engage with the religious community.

To ensure the Service captures feedback from people across different religions and belief systems, the consultation was extensively promoted through religious groups, faith-based organisations and places of worship. For example, engaging with people at Wrexham Islamic Centre, the Service was able to connect with British citizens that have migrated from Turkey, Pakistan, Iraq, Iran, India and different parts of west Africa. Through the Wrexham African Community, who are based at St Mary’s Cathedral, staff managed to connect with people from different parts of Africa. The North Wales Interfaith Forum played a key role in helping the Service connect with small religious groups.

The table below provides a breakdown of different religious groups, although 393 people decided to skip this section.

Table 3.1.4.2 – Religion and/or belief – Do you affiliate with any particular religion, faith or belief system?

	Number of respondents	% of respondents
No religion	606	45%
Christian (all denominations)	683	51%
Muslim	15	1%
Buddhist	7	1%
Hindu	1	<1%
Jewish	2	<1%
Sikh	2	<1%
Bahai	1	<1%
Any other religion	16	1%

Base: all respondents excluding 'no response' (1,333)

Not directly related to the Emergency Cover Review, some feedback highlighted the need for the Service to engage more regularly to promote fire safety messages. Feedback from different religious groups highlights some concerns around the lack of engagement from our Service and the fact we are proposing reducing fire cover in areas which have higher concentrations of religious people, especially those from ethnic minority backgrounds.

Feedback was captured from youths and young adults at the Ethnic Minorities & Youth Support Team (EYST) that run youth provision in Wrexham. Young people from all ethnic backgrounds including British, Eastern European, Asian and African heritage disclosed different religious beliefs, although no specific risks emerged in relation to their religion or belief. Other feedback from this group has been covered in the 'Race' section.

Respondents at the Wrexham Islamic Centre were particularly concerned about the proposal where Wrexham could potentially see its third fire appliance moved to another location. There was a

			strong view that Wrexham's third fire appliance would reduce the Service's capacity to complete non-emergency work including Safe and Well Checks, attending community events and visits to the Mosque. It was explained that the Service has dedicated teams of staff that oversee fire safety work. Also, it was explained that now the Equality, Diversity and Inclusion Officer has connected with the Wrexham Islamic Centre as well as other faith-based organisations, arrangements can be made for other Service staff to visit and promote different services.
Likelihood	Impact	Overall	
2	1	1	Internal Stakeholders The Equality, Diversity and Inclusion Officer has liaised with the Service's Religion, Ethnicity and Cultural Heritage (REACH) Staff Network during the pre-consultation phase to identify any potential concerns and nothing emerged. During the main consultation, no concerns directly relating to religion emerged. Therefore, risk can be deemed low.

Race			External Stakeholders
Likelihood	Impact	Overall	Like other regions in Wales, North Wales has become more ethnically diverse in the past decade. According to the census data in 2021, ethnic minority groups has increased from 4.4% in 2011 to 6.2% in 2021 (WG, 2022b). For clarity, ethnic minority is any ethnicity outside of white 'Welsh, English, Scottish, Northern Irish and British'.
4	3	12	The largest ethnic minority group in every local authority in Wales was "Other White". The proportion of the population identifying with this ethnic group was highest in Wrexham (4.8%) and Flintshire (3%). Within the high-level "White" ethnic group, Conwy was the local authority with the highest proportion of those identifying as "Irish" (0.7%) in Wales. Interestingly, 5.3% of households were multiple ethnic group households, up from 4.2% in 2011 (WG, 2022b).

With intersectionality in mind, the Service has acknowledged potential language, communication and cultural barriers exist. Nationally in Wales, 2.9 million usual residents aged three years and over spoke English or Welsh as their main language (96.7% of the population, down from 97.1% in 2011).

Of the usual residents in Wales who did not select English or Welsh as a main language in 2021, 78% said they could speak English well or very well, while 22% could not speak English very well or at all. As in 2011, Polish was the most common main language after English or Welsh at 0.7% of the population. Arabic (0.3%) was the most common main language aside from English, Welsh or Polish in 2021. British Sign Language (BSL) was the preferred language of 900 people (which equates to 0.03%) usual residents aged three years and over across Wales. This insight was extremely important during the pre-consultation phase and the Service was able to organise translation when required. For example, Portuguese translation was arranged at an in-person briefing session at Ty Pawb in Wrexham back in June 2023. Community members were clear about the consultation at this stage, and they received information relating to the main consultation via a community leader who spoke Portuguese fluently. Specific engagement with the travelling community along the Llangollen Canal during the pre-consultation period in June helped raise awareness and encourage people to provide feedback in main consultation once it went live in July.

Key consultation information was provided in different formats from the outset to help widen access – including easy read documents and large print versions. Key information was located on the Service’s website, and this enables community members to select their preferred language as well as facilitating accessibility requirements. A statement ‘*If you require any information in an alternative format, please contact us*’ was included on all documentation. The Equality, Diversity and Inclusion Officer received several requests forwarded and supplied this documentation.

The Service was able to build on the existing contact list established during the pre-consultation phase. For example, although contact was made with the Ethnic Minorities and Youth Support Team (EYST) back in June, they helped organise a meaningful focus group where connection was made with 29 people that live or work in North East Wales. The feedback was particularly informative because many of the young people have previously lived in the middle east, eastern Europe and parts of South America. With intersection in mind, EYST enabled the Service to capture feedback from people across different ethnic groups and some of them affiliate to different religions, each holding unique cultural practices, experiences and viewpoints.

The questionnaire that community members completed during the consultation featured a question '*Are there any other equality issues that we could be thinking about?*' and some specific comments relating to race can be summarised as ensuring minority groups take part in the consultation and addressing language barriers. Interpretation of different languages was arranged at several equality focus groups in the pre-consultation and during the main consultation phases. Printed information was translated into Welsh and English as standard and other languages were available on request. Comprehensive information relating to the consultation was provided online via the Service website and this was available in 77 languages which helps overcome potential language barriers. The questionnaire feedback features some generic comments which includes recruiting a more diverse workforce which can lead to delivering a more inclusive service to the community we serve.

In the equality focus groups, several concerns were raised. Young people at the Wrexham Islamic Group were concerned about the potential lack of firefighters to conduct 'community' work and Safe and Well Checks if staff numbers were reduced; they shared the view that they felt their communities were not currently communicated with enough and the removal of the third fire appliance would worsen the situation. Respondents were informed that the Service have dedicated teams of staff that conducted non-operational tasks including Safe and Well Checks. It was communicated that operational firefighters do carry out some community engagement work and Safe and Well Checks and this will not change in the future regardless of whether Wrexham has two or three fire engines.

			Concern was raised at the Wrexham Islamic Centre Youth Group that older members of the Muslim community were at risk, with challenges faced by those who do not have Welsh or English as their first language. This feedback has been communicated with the Service's fire safety department for consideration. The Service has interpretation and translation services it can access to promptly organise community visits and Safe and Well Checks if required. The desired position is to recruit talented people who can add value by communicating in multiple languages that are most popular in specific locations.
Likelihood	Impact	Overall	
1	5	5	<p>Internal Stakeholders</p> <p>The Equality, Diversity and Inclusion Officer liaised with the Service's Religion, Ethnicity and Cultural Heritage (REACH) Staff Network during the pre-consultation phase to identify any potential concerns and nothing emerged. During the main consultation, no current concerns directly relating to race, ethnicity or nationality. Although risk can be deemed low at this stage, cultural practices need to be considered on an ongoing basis due to some ethnic group being far more likely to care for elders and older people in their households (i.e. parents or grandparents). Although firefighters have highlighted how duty systems and workplace location should be considered, these types of considerations are also currently managed through existing policies such as special leave.</p>

Socio-Economic Duty	<p>This section includes a profile of North Wales which provides statistical data, narrative and context. The Service have based this socio-economic analysis on the Equality and Human Rights Commission's Equality and Human Rights Measurement Framework which includes education, work (employment), health, living standards, justice, and participation. Specific commentary has been provided through various sub-sections education, employment, health and living standards which all link to how the Service has promoted accessibility and widen access for some people to actively participate in the consultation process. This feedback provided essential insight which the Service can use to inform decision making.</p> <p><u>A profile of North Wales</u></p>
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Likelihood	Impact	Overall	
5	3	15	<p>North Wales has a population of 687,000 people spread over a geographical area of 2383 square miles (or 6,172 square kilometres). North Wales is made up of six counties which include Conwy, Denbighshire, Flintshire, Gwynedd, Ynys Mon, and Wrexham. It encompasses a diverse landscape, including Eryri national Park, mountainous regions, coastal areas, and rural communities. The region is well connected, with major highways, railways, and ports providing access to the rest of the UK and Europe. The largest city in North Wales is Wrexham, which serves as a hub for commerce and industry, while other major conurbations include Bangor, Caernarfon, Colwyn Bay, Deeside, Llandudno and Rhyl. The region is also home to several universities and colleges, providing a strong talent pool for local and international businesses that are located here. Additionally, the region is a popular tourist destination, attracting visitors from all over the world with its stunning coastline, rich history, and unique culture. Welsh, as a language for living, remains at the heart of the modern Welsh identity. Enjoying family life, education, work and leisure all through the medium of Welsh is testimony to the importance of the language to the people of Wales.</p> <p>According to the Census 2021, some of the most deprived areas in Wales are concentrated in North Wales coastal and border towns (ONS, 2021; WG, 2021a). These areas include Rhyl and Kinmel Bay. In Rhyl South West, around 70% of households are affected by deprivation. Other areas, such as Abergele, Denbigh West and Gronant also have fairly high rates of deprivation, at around 60%. Around 50% of homes are affected by at least one type of deprivation in St Asaph, Dyserth and Mostyn. Caia Park Community in Wrexham lies within the 10 most deprived areas for the income, education and community safety domains. Other deprived areas include coastal communities across Flintshire include Deeside, Delyn and Alyn. Comprehensive engagement was conducted in these deprived areas and a full breakdown can be found in the geography section. Feedback was captured from 185 people in Flintshire. Although 265 people (Which equates to 15% of the respondents) did not state where they are from on the questionnaire. Some people that attended the equality focus groups claimed to live-in Deeside, Rhyl and Wrexham areas which indicates that further feedback was captured from the most deprived areas in North Wales.</p> <p>To ensure the Service could engage and receive meaningful feedback from people across North Wales, but also those living in these deprived areas, the correct communication methodology had to be adopted. To explain this further, during the pre-consultation phase, the Emergency Cover Review Working Group acknowledged that many people would experience barriers to accessing the consultation and providing essential feedback. For example, some people don't have access to the internet, so the online questionnaire would not be suitable for them. Some people have little or no means of travel or financial</p>

			<p>capacity to access public transport, so attending in person consultation sessions can be challenging. The wide range of communication and engagement methods adopted by the Service enabled the Service to connect with people that are (or may be) at an increased risk of experiencing inequality, financial hardship and socio-economic disadvantage.</p> <p>With intersectionality in mind, most children living in poverty live in working households at a rate of around seven in ten (See WG, 2019) and families with children are most at risk of in-work poverty, especially lone parents. As discussed in various sections of this document, young people, parents, especially single parents were targeted to provide feedback. 17 public engagement events in the community enabled local people to provide feedback face-to-face in accessible venues with good transport links. The Service acknowledged that some people do not enjoy social interaction and therefore would prefer virtual technology (e.g. Teams) to access online sessions. Two online sessions were planned, although attendance was very low. Further consultation with hundreds of community partners identified there was no need to organise any further online sessions. In addition to the public engagement events, 17 equality focus groups were organised to widen access for people that fall under the definition of deprived and poverty to include single parents, people not in education or employment. The mapping exercise that was conducted at the start of the pre-consultation was extremely useful to identify key partners and the types of communication the Service would need to consider to capture feedback that can inform decision making after the consultation.</p> <p>Printed information and questionnaires were made available in post offices, shops, community centres, places of workshop and other key venues in villages, towns and cities to help widen access. The printed questionnaires were FREEPOST, thus removing any financial barriers and encouraging members of public to return completed copies. A total of 226 printed questionnaires were received, some of them were completed in the focus groups, some were handed to staff in person, and some were returned via the FREEPOST option which suggested this option was justified.</p> <p>Although the large majority of responses were submitted via the online questionnaire, the physical printed documents were very beneficial to many people. 226 printed questionnaires were submitted, and this demonstrates the importance of having a combination of methods to capture feedback. It must be acknowledged that 1500 responses were submitted online and between 50-70 responses were completed during the public engagement events or equality focus groups using a Service laptop. This was based on requests for our staff to assist community members to complete the questionnaires, while some</p>
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community members disclosed that they did not have access to the internet or smart phone technology due to financial pressures.

Education and Employment

A household is classified as deprived in the education dimension if no one has at least level 2 education and no one aged 16 to 18 years is a full-time student (ONS, 2021). Although no specific equality themes emerged from the feedback during the public consultation, it is important to acknowledge the educational profile and demographics which provides some context to potential barriers to employment, further education and higher education. The Welsh Government (2021b) estimate 9.4% of 16 to 18-year olds in Wales are Not in Employment, Education or Training (NEET), compared to 15.3% of 19 to 24-year olds. North Wales (14.4%) has the highest proportion of young people (aged 16 to 24) who are NEET, when compared to 13.1% in South Wales who have the lowest. With intersectionality in mind, 55.8% (26,600) of males aged 16 to 24 years old were NEET, compared to 44.2% (21,100) of females aged 16 to 24. Disabled young people are more likely to be NEET than young people that are not disabled and the proportion of disabled people who are NEET rises from 18.1% at age 16 to 18 to 41.2% at age 19 to 24 (WG, 2021b).

The employment rate for people aged 16 to 64 in Wales was 73.0% in the year ending March 2023, down 0.6 percentage points on the previous year (WG, 2023). Unemployment rates differ across North Wales with Gwynedd (26.4%), Denbighshire (26.1%), Conwy (24.2%), Ynys Môn (22.6%) (Wrexham (22.1%) and Flintshire (21.3%). North Wales has some positive news regarding employment. According to the Welsh Government (2021), the lowest estimated economic inactivity rates in Wales were in the Vale of Glamorgan (15.7%), Gwynedd (16.4%) and Swansea (17.1%). Option 1 adds value in Gwynedd through the potential creation of new wholtime duty systems which could create new full-time employment for people living in this area that aspire to become firefighters.

Employment (or working) does not preclude experiencing poverty. To explain further, in-work poverty has risen over the last 5 years and a total of 12.7 per cent of workers live in poverty due to low pay or limited hours (JRF, 2020). Low-paid work is the biggest contributor to in-work poverty as it makes it very difficult to escape poverty, mainly because some people don't get paid enough or there are not many well-paying jobs in a particular area (JRF, 2020). Pay gaps and in-work poverty affect certain groups much more than

others and the risk of in-work poverty is greater for disabled and ethnic minority workers (WG, 2019). Therefore, engagement with people that are both unemployed and employed across different protected characteristics is equally important.

To ensure North Wales Fire and Rescue Service was able to reach out and capture the needs of people who meet the criteria for low economic status and deprivation, a comprehensive stakeholder mapping exercise was conducted as part of the pre-consultation. This process identified key partners across different geographical locations that could help us capture feedback. Partners included local businesses, charities, foodbanks, places of worship, faith-based organisations, community groups and public organisations. These partners played their part in helping us promote the consultation and encourage participation. This range of partners helped ensure the Service captured feedback from people who were currently unemployed, in education, people who are retired and people who are unable to work for medical reasons. The main report also refers to the responses that we received from local businesses and industries which helped us capture feedback from people who are employed. As a Service, we wanted to ensure the research methodology enabled us to capture feedback from people from all backgrounds with regards to income and socio-economic status. Nothing 'equality related' emerged from the feedback.

External stakeholders

Overall, two-thirds of respondents (68%) agreed that Option 1 met the needs of their communities. Respondents that strongly agree or agreed to Option 1 can be broken down and ranked as follows; Conwy (76%), Gwynedd (73%), Wrexham (67%), Anglesey (66%), Denbighshire (58%) and Flintshire (58%). Specific feedback and equality themes have been highlighted in the relevant sections of this EqIA.

During the main consultation, various themes emerged relating to financial pressures, affordability, cost of living increases and consideration for firefighters pay. Despite the financial pressures on people in society, there was overwhelming support from respondents to appropriately finance their local fire and rescue service. Only 3% of respondents selected 'Affordability' as the most important criteria, 41% of respondents selected it as their least most important from a group of six which clearly indicates 'affordability' is not a concern.

In the questionnaire, only 3% of respondents felt Option 3 was the best option with reasons for their choice surrounding a saving which reduces the cost to the taxpayer. In contrast, 93% disagreed with Option 3. Many respondents hold the view that affordability should not be considered, due to the importance of the service and it 'not being about money'. In considering each of the three options, small numbers of respondents spontaneously commented that they would be happy to pay more for an adequate or better service (Option 1 – 1%; 25 respondents, Option 2 – 1%; 18 respondents, Option 3 – 1%; 9 respondents).

Whilst many of those providing formal responses acknowledged the necessity for financial savings, they felt that the primary concern needed to remain the provision of services based upon a risk assessment of demand, irrespective of cost and that careful thought needed to be given to preserving human lives before monetary considerations. The overwhelming support for Option 1 could justify adopting this option, but it is recommended that this would be subject to careful consideration for the potential impact(s) on internal stakeholders.

Health and Living Standards

In terms of health, a household is classified as deprived if any person in the household has general health that is bad or very bad or is identified as disabled (ONS, 2021). There is a direct link between the cost of living crisis and health with 60 per cent of people in Wales say their health has worsened due to rising costs (NHS, 2022b).

Life expectancy is an important consideration when exploring living standards and health. In Wales, life expectancy at birth was 82 years for women and 78 years for men for 2018-20 (WG, 2022c). This was a slight reduction for both males and females, following higher death rates in 2020 during the COVID-19 pandemic. Healthy life expectancy was 62 years for females and 61 years for males in 2018 to 2020.

WG stats (2022c) suggests the highest life expectancy for women in North Wales was 83.1 years in Conwy and Gwynedd, while in men it was Gwynedd (79.5). The lowest life expectancy for women in North Wales was in Denbighshire (81.1) and in men it was Denbighshire and Wrexham (78.3).

You can compare the figures across North Wales here:

			Healthy life expectancy			Life expectancy	
			County	Women	Men	Women	Men
			Anglesey	63.6	64.2	82.9	79.3
			Conwy	66	63.4	83.1	78.4
			Denbighshire	65.8	63.3	81.1	78.3
			Flintshire	64	64.2	82.2	79.2
			Gwynedd	68.1	65.1	83.1	79.5
			Wrexham	63.3	63.8	81.3	78.3
			<p>It is extremely useful to understand where people are at risk in the community. Although there was lots of generic feedback from the public during the consultation, there was limited feedback which suggested the Service could be at risk of discriminatory practice.</p> <p>Through our prevention and business fire safety work, the Service proactively provides advice and guidance to keep domestic and business properties safe.</p>				
Likelihood	Impact	Overall					
			<p>Internal Stakeholders</p> <p>Under the socio-economic duty, the Service is required to identify, consider and mitigate any risk(s) of putting the firefighters at an 'disadvantage' as a result of the proposed changes. When implementing the duty in practice, the Service have shown due regard to the following best practice by following the Welsh Governments 'A Moral Equal Wales' mapping duties guidance. The Service have also adopted Public Health Wales guide 'To using Socio-economic Duty in policy and practice in Wales' which includes a five-stage process of planning (Identifying if it is a strategic decision), evidence gathering (consulting and receiving feedback), assessing (Which will be conducted as part of any relocation of firefighters, decision</p>				

			<p>making (Working Groups, Fire and Rescue Authority meetings) and recording of relevant information which captures written and verbal dialogue, especially concerning strategic decision making.</p> <p>With regards to internal stakeholders, socio-economic disadvantage can be disproportionate in both communities of interest and communities of place, leading to inequality of outcome, which can be further increased when considering intersectionality. During the internal focus groups, various concerns were raised relating to increased costs that have the potential to place some firefighters at a disadvantage. The cost of living with specific reference to increased rent, mortgage, food, household energy and fuel were reasons firefighters are experiencing increased financial pressures. Firefighters generally acknowledged that these increasing costs make it challenging, but as one person described <i>'any additional increases of cost to them would be highly damaging'</i>.</p> <p>Various themes emerged during the internal focus group which include:</p> <p>Increased travel costs emerged as a concern in all focus groups. These costs centred around increased fuel costs and wear and tear on vehicles as a result of having to travel further to work if they are required to move to another work location. Time lost to additional traveling was seen by a small group of firefighters as a loss to potential earning because they won't be able to do any on-call cover or overtime. To mitigate this type of risk, the Service would work to mitigate any additional costs to their employees that could potentially be relocated to a place of work that is further away to their current location. This type of allowance would be for an agreed period of time to minimise any potential impact.</p> <p>Childcare costs, a theme which constantly emerged in the focus groups. Twenty-two Firefighters out of Thirty-Seven are parents, with twelve of them having two or more children. Feedback suggested childcare costs are very expensive, especially for those who have more than one child. Many firefighters don't have family members that are able to assist with 'Free' childcare and some firefighters have partners that work away or work opposite shifts, so changes are likely to increase the childcare provision they require. The Service will consider childcare when undertaking any potential relocation of employees.</p> <p>Caring responsibilities was highlighted by firefighters at Deeside, Rhyl and Wrexham. Although there was no indication that their caring roles had a direct financial implication on the firefighters, it did impact on their ability to work overtime, work on-call or even earn money via a second job. The Service will consider caring responsibilities when undertaking any potential relocation of employees.</p> <p>Pet Welfare was highlighted by two firefighters, both where dogs are concerned. Although one dog can be defined as a pet, another dog is an assistance dog, so careful consideration is required to ensure</p>
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			<p>changes in duty systems or workplace location doesn't negatively impact on the animal welfare. Not a lot of detail was provided, but there may be costs associated with a dog sitter if the animal will be left unattended beyond a reasonable timeframe which may occur as a result of new duty system or extended travel time. Due regard is required to mitigate any potential case of discrimination by association. The Service has a legal duty to consider any particular need(s) that fall under one or more protected characteristic.</p> <p>Some firefighters also disclosed they are 'single' and only one income comes into their household, so any increase to existing costs would be unmanageable. For various reasons, many firefighters disclosed they experience financial hardship because of increased financial pressures and the proposed changes are almost certain to place them at a further disadvantage. To mitigate any risk of being disadvantaged, firefighters that are involved in the potential relocation of workplace will be able to explain their situation to the Service. This opportunity enables them to explain their individual needs and challenges which will allow the Service to consider this in decision-making. To satisfy the socio-economic duty, it is recommended that the Service considers the costs to identify those who could be financially disadvantaged as a result of any proposed changes. It is the Service's responsibility to determine which costs and to what degree any potential increases can be justified or not justified.</p> <p>Single increases in costs such as fuel to travel to work can be easily justified by the employer. However, it may not be justified in situations where an employee experiences a combination of different increases in cost that could result in them having sufficient and unmanageable cost increases.</p>
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Welsh Language		
Likelihood	Impact	Overall
4	1	4

External Stakeholders

The Emergency Cover Review has been communicated in Welsh and English. Careful consideration has been given when producing information (written and verbal) to ease translation and ensure the end users has access. The same consideration has been given to interpretation when organising public consultation session and equality focus groups.

The number of people that stated they could speak welsh in North Wales is 235,567 and this equates to 34.3%. The Service is extremely proud to communicate in Welsh and always work hard to meet (and where possible exceed) the Welsh standards. The most recent data published by the Welsh Government suggests 29.1% of people aged three and over were able to speak Welsh. This figure equates to 883,600 people and there is evidence that the Welsh language is growing in popularity as a spoken language and as a first spoken language. With intersectionality in mind, we acknowledge that the highest percentages of Welsh speakers in Wales can be found in Gwynedd (77%) and the Isle of Anglesey (67%) which are both located in North Wales (WG, 2022).

In the case of Option 3 that considers the closure of five on-call fire stations, two of the on-call stations are in areas with a high volume of Welsh speakers, and they also employ a majority of Welsh speakers - Cerrigydrudion and Llanberis Fire Stations. The closure could not only impact on the public's ability to use Welsh with the Service, but also negatively affect employment opportunities for Welsh speakers in rural areas.

Another two stations are part of a wider area that is considered a Welsh 'heartland' – Abersoch and Beaumaris. However, despite the wider area being traditional Welsh 'Heartlands' both stations are within areas that can be considered linguistically sensitive due to the decline of Welsh speakers residing in these areas as a result of both being considered high tourism areas and hotspots for second/holiday homes. Again, this could not only impact on the public's ability to use Welsh with the Service in areas where the Welsh language is vulnerable but also lead to a reduction in employment opportunities for Welsh speaking people in linguistically vulnerable areas.

Conwy Fire Station, whilst not in an immediate Welsh 'Heartland' area, is a bilingual employment opportunity for Welsh speakers in the area. Conwy County has a large disparity of Welsh speakers between the North and South of the county with the coastal areas, including Conwy town, having fewer Welsh speakers than the rural areas and therefore can also be considered a linguistically sensitive area in terms of Welsh speakers.

Redistributing staff and creating more day staffed stations, in Welsh 'Heartlands' and in rural areas with high numbers of Welsh speakers could have a positive impact on the Welsh language within the local areas. Providing opportunities for the public to engage with a day staffed fire station in

			<p>Welsh. This could have a positive impact on the public's perception of the Service as a bilingual organisation that provides services in Welsh.</p> <p>Additionally, creating new day staffed stations in the proposed areas and redistributing staff from other areas of the Service could have a positive impact on our staff's ability to use Welsh with the public, as the proposed new day staffed stations are in areas considered to have a high number of Welsh speakers.</p> <p>68% of respondents either strongly agree or agreed that Option 1 will provide the best fire cover. Option 1 can be justified as the best option for many reasons which includes the Service's ability to preserve, promote and use the Welsh Language. To explain further, Option 1 retains the existing firefighter workforce which include many Welsh speakers and some who primary language is Welsh. Option 3 included fire station closures at five different locations.</p>
Likelihood	Impact	Overall	
4	1	4	<p>Internal Stakeholders</p> <p>In the main questionnaire, the question '<i>Are there any other equality issues that we could be thinking about?</i>' prompted some responses from staff. A number of respondents commented here in relation to employment diversity, with the main focus falling upon the Welsh language. Whilst some felt employees should have a certain level of Welsh and that Welsh should be protected, others commented that they felt the requirement to speak Welsh was not required and may be limiting in terms of recruitment.</p> <p>Although it is always a balancing act to recruit the right skills into the relevant roles and ensure staff can communicate in Welsh, the Service commits to meeting the requirements set out in the Welsh Language Standards to ensure services can be accessed by the public equally in Welsh and English.</p>

Geography and Location			
Likelihood	Impact	Overall	
4	1	4	<p>External Stakeholders</p> <p>North Wales is a large geographical area which has several urban areas that are highly concentrated with diverse people and groups. In contrast, some rural areas have extremely small numbers of people</p>

			<p>residing in the area.</p> <p>The region includes the localities of Wrexham, Deeside, Rhyl, Colwyn Bay, Flint, Bangor, Llandudno and Holyhead. The largest localities in North Wales are the city of Wrexham and the conurbations of Deeside, Rhyl and Prestatyn, where the main retail, cultural, educational, tourism, and transport infrastructure and services of North Wales are located. Bangor, St Asaph and Wrexham are the region's cities, Bangor is Wales' oldest city, whereas St Asaph is one of Wales' smallest and Wrexham which became a city in 2022 is the region's largest settlement.</p> <p>North Wales has some well-established community groups across the six counties which enable the Service to engage and connect with people. It was acknowledged during pre-consultation (i.e. Stakeholder Mapping exercise) that some areas don't have any established community groups and social hubs which makes connecting with people in some geographical areas more challenging. Well planned community engagement through a combination of public engagement events and equality focus groups has helped the Service capture comprehensive feedback that can be deemed representative.</p> <p>The breakdown of respondents can be seen below:</p>
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			Local authority area	Number of respondents	% of respondents
			Anglesey	125	7%
			Conwy	425	25%
			Denbighshire	181	11%
			Flintshire	185	11%
			Gwynedd	239	14%
			Wrexham	306	18%
			Not stated/No response	265	15%
			<i>Base: all respondents (1,726)</i>		
			<p>Overall, two-thirds of respondents (68%) agreed that Option 1 met the needs of their communities. Respondents that strongly agree or agreed to Option 1 can be broken down and ranked as follows; Conwy (76%), Gwynedd (73%), Wrexham (67%), Anglesey (66%), Denbighshire (58%) and Flintshire (58%).</p> <p>There were various petitions submitted by local authorities, town and parish councils, members of parliament and union representatives in specific geographical locations. These petitions centred around the opposition of the proposed closure of the five fire stations, removal of the third fire appliance at Wrexham and changes to duty systems at Deeside and Rhyl. Each of these petitions referred to specific geographical locations and although there is no specific reference to risks of discrimination, there is the view that the proposed changes (or options) will put lives at risk. Full details can be found in the Emergency Cover Review report titled: '<i>A report on the responses to the consultation</i>'.</p>		
Likelihood	Impact	Overall			
3	3	9	<p>Internal Stakeholders</p> <p>Although staff from all geographical locations had the opportunity to participate in the main consultation, firefighters in specific locations also provided feedback through participation in the internal focus groups. Those firefighters from Deeside, Rhyl and Wrexham provided feedback, alongside some other wholetime staff from Holyhead, Llandudno and three firefighters from unknown locations. Specific commentary has been highlighted in the relevant sections of this EqIA. In terms of geographical location there was general acknowledgement that better fire cover is required in</p>		

			Gwynedd and there was strong opposition to the closure of fire stations in five key locations and opposition to proposed changes of duty systems in key locations. Risk to the firefighters involved will be carefully mitigated and managed through any potential relocation of firefighters where a process that will promote equality, inclusion and fairness based on individual needs will be adopted. This process will also consider where a firefighter lives and current works.
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On-Call System or Part-Time Staff Considerations for			External Stakeholders
Likelihood	Impact	Overall	
5	3	15	<p>By the very nature of an emergency cover review, on-call staff are directly involved in the consultation. Some on-call teams played a very important role to help promote the public consultation sessions which enabled our Service to connect with people living within their local communities.</p> <p>During the main consultation, community members were very passionate and complimentary towards their local on-call firefighters. Concerns surrounding the closure of on-call fire stations emerged at all public consultation sessions and equality focus groups. Although feedback did not specifically raise any concerns of the Service directly discriminating against any protected group of people, it was strongly suggested that closure to fire stations would put lives in the community at risk, plus job losses would have huge impact on the on-call firefighters that give us so much to help protect people in their community.</p> <p>The consultation has provided an opportunity to raise awareness about challenges with recruitment of on-call firefighters in some areas. Discussions and feedback during the consultation centred around how the Service can increase availability. Suggestions also included generating more interest, making the role more incentivised and reviewing how on-call firefighters are paid. The need to foster interest in young people whilst still at school was well supported in a public forum, along with another suggestion of holding recruitment opportunities at local business and industrial parks. The suggestions are in addition to the key recommendations which emerged in the Services review into the on-call retained system which was concluded in 2022.</p>
Likelihood	Impact	Overall	Internal Stakeholders
4	2	8	

			191 staff provided feedback in the main consultation and this equates to 11% of the workforce. Some on-call staff attended the public engagement events and provided some feedback through this platform. All on-call staff were consulted with as part of the internal feedback sessions which saw members of the Senior Leadership Team visit all the affected stations during the early stages of the consultation. This provided an opportunity for on-call firefighters to speak openly and raise concerns. There was very little support for closing any fire stations at this time. Although the Service may be able to objectively justify closing any fire station without the risk of discrimination, reputational damage needs to be considered.
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Other Equality Interest Groups			During the pre-consultation phase, there was a slight concern that some people may not engage with our Service due to their lack of confidence and trust in accessing public services. On reflection, we are confident that we captured comprehensive feedback from a majority of the groups of people we set out to engage with at the start of the project. In future consultations, we need to improve the ways we engage with people who have sensory disabilities, engage with a broader range of ethnic minority groups and focus more on specific rural areas to capture feedback.
Likelihood	Impact	Overall	
3	3	9	

Do any of the above criteria have a score of 12 and above assessment?

Yes No

If yes, please contact the Equality, Diversity and Inclusion Officer via e-mail benji.evans@northwalesfire.gov.wales 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 in place.

Some sections have a score of 12 which is classified as medium risk. These scores represent specific risks that have the potential to have an adverse impact on internal and/or external stakeholders. Mitigation can reduce the risk through showing due regard and carefully considering need, sometimes at a micro and individual level. This EqlA has highlighted all the risks that have emerged during the consultation. The Service has a suite of relevant policies and inclusive processes to manage the risks that have been identified and this will ensure effective decision making will remove any risk of discrimination or situations where our people could experience sufficient disadvantage because of changes to their working arrangements or workplace location. A robust relocation process will be conducted and during this period, firefighters will have the opportunity to explain their personal situations which may include specific equality needs. This process will include a preferencing exercise and the Service will use this process to identify and consider potential risk of discrimination and disadvantage. This information will inform fair decision making which helps the Service promote inclusion.

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

This EqlA demonstrates how the Service has shown due regard for potential risks of discrimination and socio-economic disadvantage. The dialogue with internal and external stakeholders has also helped ensure that our Fire and Rescue Authority has the relevant information to make well informed decisions. The consultation process has captured comprehensive feedback across a representative research population which has provided both insight and direction. This EqlA has also provided some recommendations that help mitigate the risks identified and this can help the Service achieve the best positive outcomes. The information within this EqlA can also play a role in helping decision makers objectively justify some decisions which cover some complex topics. Some firefighters based in the south Gwynedd and other parts of North Wales will embrace the opportunity to work wholetime in their local community and in another area. The consultation has identified how the proposal to create new wholetime fire stations which result in wholetime firefighter's positions being available in Gwynedd, thus helping to widen access and has the huge potential to meet careers aspirations in these geographical areas for future generations.

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.

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