

## Equality Impact Assessment

<b>Title of Policy</b>	The next Fire and Rescue Framework for Scotland.
<b>Summary of aims and desired outcomes of Policy</b>	The Fire and Rescue Framework for Scotland will provide guidance and support to the Scottish Fire and Rescue Service (SFRS) on its priorities and objectives in carrying out its functions.
<b>Directorate: Team</b>	Safer Communities: Fire and Rescue Unit.

### Executive Summary

The public sector equality duty required the Scottish Government to assess the impact of applying a proposed new or revised policy or practice. It is a legislative requirement. Equality legislation covers the characteristics of age, disability, gender reassignment, sex, pregnancy and maternity, race, religion and belief, and sexual orientation.

An equality impact assessment (EQIA) aims to consider how policy (a policy can cover: activities, functions, strategies, programmes, and services or processes) may impact, either positively or negatively, on different sectors of the population in different ways.

The EQIA has been developed to consider impacts on equality from the new Fire and Rescue Framework for Scotland (“The Framework”), which will be brought into force by SSI.

It is a requirement of Section 40 of the Fire (Scotland) Act 2005<sup>1</sup> (as amended) that Scottish Ministers prepare such a Framework document, and do so in consultation with SFRS, bodies representing SFRS staff, COSLA and any other relevant bodies.

The Framework is the statutory vehicle through which Scottish Ministers set out priorities and objectives that the Scottish Fire and Rescue Service (SFRS) must have regard to in carrying out its functions. The Fire (Scotland) Act 2005 states that Scottish Ministers will keep the Framework under review, and ‘may from time to time revise it’.

As part of the EQIA process, the Scottish Government considered potential impacts of the new Framework on people with one or more protected characteristics. The EQIA concluded that the new measures are neither directly nor indirectly discriminatory on the basis of age, disability, sex, pregnancy and maternity, gender

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<sup>1</sup> [Fire \(Scotland\) Act 2005](#)

reassignment, sexual orientation, race, religion or belief and marriage and civil partnership.

Through the EQIA process, the Scottish Government identified that the new measures within the Framework provide the opportunity to promote equality for people with one or more of the protected characteristics.

## **Background and Scope of the EQIA**

The current Framework has been in place since September 2016 and sets out 10 strategic high level priorities for the Service. It is less prescriptive than the previous 2013 Framework, a reflection of the fact that SFRS was by then an established national body. It also asked SFRS to explore new ways of working to allow it to contribute an even greater role in the protection of Scotland's communities.

Given the changes to the public sector landscape since 2016, coupled with the fact that Scotland is facing ever more complex challenges and risks - the consequences of which are having profound impacts at community level – the Scottish Government believe it is timely to re-fresh the strategic direction for SFRS within a new Framework.

Officials have been working on the development of the new Framework over the course of 2021 to develop the new priorities which will form the Scottish Ministers' 'ask' of the Service.

As part of the consultation process the Scottish Government has also sought the views of other external organisations where possible. These include Inclusion Scotland, Disability Equality Scotland, British Deaf Association Scotland, Stonewall Scotland, the Chair of the Scottish Independent Living Coalition, VOX Scotland, Scottish Commission for Learning Disability (SCLD) and Deaf Scotland; and organisations concerned with women's equality in the workplace and society, such as Engender and Close the Gap.

The 7 strategic priorities in the new Framework are outcome focused, set within the context of Scottish Ministers' Programme for Government, and can be broadly categorised under the 4 pillars of Christie – people, performance, prevention and partnership. These priorities form the basis for the narrative of the chapters in the Framework.

Underpinned by Scotland's National Outcomes, the strategic priorities set out within the Framework serve to collaboratively drive forward how the Service can do more for the people of Scotland, while adapting to the changing nature of risks facing communities across the country.

Many of these priorities are overarching and are relevant for several aspects of SFRS's role. SFRS must have regard to these priorities when developing its Strategic Plan – in essence the Framework sets out at a high level what we expect the SFRS to focus upon, and its Strategic Plan will set out the details of how SFRS intend to do this.

Specifically, the EQIA assesses any impacts of applying a proposed new or revised policy or practice against the needs relevant to a public authority's duty to meet the public sector equality duty. The Scottish Government has also considered whether the measures could constitute direct and/or indirect discrimination.

The needs are to:

- Eliminate discrimination, harassment and victimisation;
- Advance equality of opportunity; and
- Foster good relations

## Key Findings

SFRS should use the priorities within the framework as a driver to shape its continuing ambitions relative to equalities. In addition to continuing its good work in this regard, the Framework sets a priority for SFRS to modernise and continuously improve and this is applicable to equality considerations:

*SFRS should continually improve and modernise the service it provides so that it can do more to improve outcomes for communities across Scotland. Modernisation proposals should be considered, developed and delivered using sound evidence and should include but not be limited to ensuring SFRS is using its people, assets and financial resources in the most efficient and effective manner and that the role of firefighters is modernised to allow the Service to address new and emerging risks in our communities.*

SFRS's Mainstreaming and Equality Outcomes Report 2021<sup>2</sup> is in accordance with its legal duties under the Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012, as amended. It is the Service's fifth Mainstreaming Report and continues to provide updates on progress since its previous reports published in 2013, 2015, 2017 and 2019. The report provides detail on the following:

- The steps that SFRS has taken to mainstream the general equality duty across the organisation;
- Progress made towards achieving the SFRS's 5 corporate Equality Outcomes;
- A revised set of Equality Outcomes that SFRS will work towards achieving over the next four years;
- Employee information together with details on progress that the SFRS has made in gathering and using the information to better meet the general equality duty;
- Information on the gender composition of SFRS's Board members; and
- Current pay gap information relating to gender, ethnicity and disability.

SFRS recognise that mainstreaming equality means not assuming that the circumstances, issues, challenges and needs of people who share a protected characteristic will be the same in every case. Recognising that individuals are

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<sup>2</sup> [SFRS Mainstreaming and Equality Outcomes Report 2021](#)

complex is key to developing a person-centred approach to public service provision and employment practice.

The SFRS view is that the protected characteristics as set out in the Equality Act 2010 should not be viewed in isolation when trying to address underlying inequalities, improve social justice and enhance the life chances of people in Scotland. Therefore, the approach taken to equality by SFRS is to view them intersectionally, in recognition that a person's identity and needs may not be comprised of just a single characteristic. Rather, it may be comprised by the relationship between overlapping social identities and protected characteristics.

SFRS recognises that mainstreaming equality means more than simply having equality as a standing agenda item at every meeting. In everything that it does and in the decisions it makes, it must consider the three needs of the Public Sector Equality Duty (PSED). By doing so SFRS should be able to ensure that it will be best placed to meet the needs of those affected by its decisions. It will be better informed of how best it can improve the circumstances of employees and communities. This approach will underline its commitment to improving the wellbeing, health and prosperity of the people living and working in Scotland.

Engaging with communities is central to the ethos of designing and delivering services that meet the needs of communities and is valuable in informing the evidence base upon which decisions are made. Ongoing evaluation and review is a cornerstone of this process and a Planning and Evaluation Policy and Procedure was developed by SFRS's Community Safety Engagement Team to increase its positive impact on our communities and helping the Service to secure greater effectiveness in the delivery of its services.

Each SFRS function is responsible for designing policies and procedures that meet the equality duty at the point of service provision. In short, equality considerations are mainstreamed into policy and procedural design and those implementing SFRS's policies meet the needs of the service recipient at the point of service delivery.

SFRS's Positive Action Strategy 2019-22<sup>3</sup> outlines the benefits of diversifying the workforce and details the priorities and actions the Service intends to develop and implement, in collaboration with internal and external partners, to promote SFRS as an Employer of Choice to Scotland's diverse communities, to attract, recruit and retain people from underrepresented groups.

Playing an active role in equality related events such as Deaf Awareness Week, LGBT History Month, International Women's Day and Black History Month provides a high profile means to target specific community groups with fire safety advice and remind all of Scotland's communities that SFRS is a public service for everyone and that it takes the obligation of meeting their needs very seriously.

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<sup>3</sup> [SFRS Positive Action Strategy 2019-2022](#)

## **Home Fire Safety Visits**

As part of its commitment to building a safer Scotland, SFRS offer everyone in the country a free Home Fire Safety Visit (HFSV), however it places particular focus on the most at risk. The visit takes place upon request and is undertaken by SFRS staff. They take place as a result of a referral from another agency, a request from the residents themselves or a family member, or as a result of an incident in the area, after which all residents are offered this service. This helps SFRS assess risk and provide the necessary advice and support.

The HFSV includes questions and observations around fire safety, wellbeing and any other lifestyle issues that might impact on personal safety. SFRS make a record of the residents' responses and it documents anything it has seen that relates to the questions and the purpose of the visit. SFRS staff are also alert to the signs of loneliness, fragility, potential slips, trips and falls hazards, signs of drug addiction and/ or alcoholism and general health risks within the home. SFRS will make referrals to other organisations where appropriate, to try and help ensure the safety and wellbeing of residents.

As the pandemic took hold last year and people were spending more time within their homes, SFRS took prompt action in implementing the "Make the Call" campaign in response to the number of fire fatalities in domestic properties. This was developed specifically for people at higher risk of injury from fire: those over the age of 50, who smoke, and have mobility issues, or live alone, or use medical oxygen. The "Make the Call" campaign encourages these individuals, their carers, family, friends and service providers to contact SFRS for a free HFSV.

## **Summary – Protected Characteristics**

Given the importance of assessing the impact on each of the protected characteristics, the Scottish Government has considered the measures in the Framework against the needs of the general equality duty as set out in section 149 of the Equality Act 2010 to eliminate unlawful discrimination, harassment and victimisation, advance equality of opportunity between people who share a protected characteristic and those who do not, and foster good relations between people who share a protected characteristic and those who do not. The Scottish Government has also considered whether the measures could constitute direct and/or indirect discrimination.

The Scottish Government has considered the evidence gathered and the inputs provided, both in the development of the new Framework and as part of our review of the impact of the current Framework. These in turn will help in the consideration of the existing and potential impacts – negative and positive – that the Framework might have on each of the protected characteristics. It is recognised that the equality duty is not just about negating or mitigating negative impacts, as we also have a positive duty to promote equality. Therefore it should be recognised that any mitigating actions do not stand alone and form part of that wider consideration of the duty.

The strategic priorities in the Framework are designed to be inclusive and support equality issues of all people and communities in Scotland. The currently identified impacts on each of the protected characteristics are explored in more detail below.

## Age

SFRS's official 2019-20 Incident Statistics<sup>4</sup> confirm there is a strong relationship between age and rates of fatal casualties. The rates for those aged below 16 are less than a tenth of the Scotland average, while the rate for those aged 80-89 is more than triple the average figure and for the over 90s it is over five times higher.

For non-fatal casualties the picture is quite different. The rate does not simply increase with age, rather adult age categories below 80-89 have relatively similar rates. Those aged 17-29 have a 38% higher than average rate and those aged 60-69 have a slightly lower than average rate. Those aged 80-89 have 1.8 times the average rate and those aged over 90 have 3.2 times the average rate.

The prevalence of fire and other emergency incidents amongst the over 60s remains noticeable and rightly has specific attention in SFRS's prevention and protection engagement and education efforts aimed directly at this group and those who may act as their carers. Initiatives arising from the need to take specific action to support this vulnerable group includes the pilot project with Bon Accord Care providers where carers and those they supported were both present during home fire safety visits to ensure that the safety messages were understood and acted upon.

Official Fire Safety and Organisational Statistics 2019-20<sup>5</sup> confirm that SFRS staff older than 50 make up 31.3% of the workforce, up 30.4% from the previous year. This proportion has increased every year since this series began six years ago. Those older than 40 make up 63.9%.

928 wholtime operational staff are in their 50s (25.5%), up 197 over three years, while 1,476 wholtime staff are in their 40s (40.6%), down 181 over three years.

Consideration of the age characteristic has helped focus the Framework for all age groups and SFRS's interaction with them. Particular examples being the SFRS Youth Volunteer Scheme discussed at 'Service Delivery – Embracing Future Opportunities', the consideration of engaging young citizens in developing web and social media presence under 'Partnership Across the Wider Public Sector' and the work to reduce avoidable injury amongst older people at home under 'Improving Wider Community Safety'. The age characteristic also impacts on the SFRS workforce and the 'People' strategic priority discusses the need for clear succession planning and retirement modelling and a well-established workforce model that provides fairness and equality across the Service. The Framework's 'People' section also discusses the importance of engaging with youth organisations on equality issues and ensuring equality impacts are assessed in the procurement process by service providers.

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<sup>4</sup> [Fire and Rescue Incident Statistics 2019-20](#)

<sup>5</sup> [Fire Safety and Organisational Statistics 2019-20](#)

## Sex (including pregnancy and maternity)

Of the 27 fatal casualties in 2019-20, 20 were male. In the last ten years 60.3% of fatal casualties were men. The rate of fatal casualties per million population is markedly different by sex, the average rate of fatal casualties in Scotland over the last ten years was 8.1, for women the average rate was 6.2 while for men it was 10.0. On average the rate of fatal fire casualties is 61.3% higher for men than women.

There is also a difference in sex in non-fatal casualty rates though the difference is smaller. The ten-year average rate for non-fatal casualties per million population in Scotland is 227, while for men it is 256 and for women 195. There is a 31.3% higher rate for men than women on average. In 2019-20 54.7% of non-fatal casualties were male.

On 31 March 2020 SFRS had a total headcount of 7,930 staff. The gender balance of staff does not vary much year-to-year and overall is around 86% men. For wholetime operational, retained, retained full-time and volunteer staff the workforce is mostly men (93.9%, 92.9%, 80.6% and 82.9% respectively) and there has been gradual change in this over many years. In the last five years, the number of wholetime operational staff who are women increased by 35.4% while those who are men decreased by 7.5%, this amounted to 58 more staff who are women and 278 fewer men.

Similarly, for retained duty staff there was an increase of 36 staff who are women (20.9%) and a decrease of 49 staff who are men (1.8%). For control staff the gender balance is 83% women. The gender balance for support staff is more even overall with 54.6% of staff who are women.

SFRS's Equal Pay and Gender Pay Gap Report 2021<sup>6</sup> confirms the Service's commitment to the principle of equal opportunities and equal treatment for all employees, regardless of their backgrounds or personal circumstances. The report demonstrates the current Gender Pay Gap within the organisation. It also provides an overview of the extensive work which has already taken place to positively balance its workforce in a manner more representative of the diverse communities of Scotland, and provides an insight into future activities intended to build on the progress already achieved. Although some of SFRS's plans were recalibrated as it reacted to the global pandemic, its commitment to equality activities has remained a firm focus throughout.

SFRS launched a Women's Network on 8 March 2021 to coincide with International Women's Day.

Consideration of the sex characteristic has helped shape the Framework in terms of both impacts on the SFRS workforce and the communities it serves. Through clear direction on ensuring equality mainstreaming through all functions there is an expectation that the gender balance of frontline firefighters needs to be addressed although the SG acknowledge that this can primarily be achieved through

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<sup>6</sup> [SFRS Equal Pay & Gender Pay Gap Report 2021](#)

recruitment and is a long term commitment that will not be met quickly through one or two recruitment campaigns. Strategic priority 6 strengthens our ambition for a modern 21<sup>st</sup> century fire service which may offer more work opportunities for those who currently may not consider a traditional firefighter role.

## **Disabled People**

Disability can increase the likelihood of an individual accidentally causing a fire and can hinder escape when one occurs. In terms of accessibility the Life Opportunities Survey<sup>7</sup> asked participants about any barriers they faced getting into rooms in their own homes. It found that disabled people were more likely than other adults to have difficulty getting in and out of rooms in their homes.

Fire fatality and serious injury victims are more likely to be falling asleep or asleep, or to have an underlying medical condition or illnesses. Excessive and dangerous storage, as well as temporary lack of physical mobility, are factors contributing to an increase in both fatalities and serious injuries. The likelihood of a fatality increases if the victim is disabled<sup>8</sup>.

Some disabled people may have specific needs in relation to communication. During this impact assessment process, the importance of accessible communication was highlighted. Since SFRS's publication of its last Mainstreaming Report the Service has been working closely with third sector community groups such as Deaf Action and has prepared a range of [BSL safety videos and other materials](#) on its website. In its commitment to eliminate discrimination; advance equality; and foster good relations with respect to disability, SFRS has also collaborated to produce a safety guide for students who are deaf and are moving into independent rented accommodation.

The accessibility of SFRS's published materials is an important feature in making the Service transparent and accountable. Where it can SFRS will provide printed materials in large print documents and formats suitable for use with screen readers. Communications around the policy will be considered to ensure that the Regulation meets the tests of PSED.

SFRS has worked with the Royal National Institute of Blind People (Scotland) to create audio versions of 14 SFRS leaflets which have been promoted on social media as well as being shared with SFRS personnel and partners. Working with RNIB Scotland SFRS has created and distributed a Braille version of the 'Your Guide To Fire Safety' booklet which contains key fire safety messages. This is also available as a print on demand resource.

SFRS's Positive About Disability Guide<sup>9</sup> was published in September 2020. As part of its commitment to equality, diversity and inclusion and its obligation as a 'Disability Confident' employer, SFRS has made a commitment to create a workplace which is positive about disability where it has removed all unfair discrimination and bias and where it encourages all employees to treat others equally.

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<sup>7</sup> [Life Opportunities Survey - Wave on results, 2009/2011](#)

<sup>8</sup> [BRE Scottish Fire Deaths briefing paper](#)

<sup>9</sup> [SFRS Positive Disability Guidance](#)



Consideration of the disabled characteristic has helped shape the narrative included within the Framework's priorities including 'People' section, strategic priority 6. This section discusses the disability characteristic with regard to SFRS's workforce and identifies the continued need for SFRS to progress its work to be an employer for all and continue to build on its Equality and Diversity Charter and the Positive About Disability Guide mentioned. It also discusses the importance of ensuring equality impacts are assessed in procurement by service providers.

## Race

Previous research had indicated that overall, ethnicity does not appear to be a significant predictor of the likelihood of dwelling fires (Corcoran et al, 2011; Chhetri et al, 2010; Asgary et al, 2010; Nilson et al, 2015)<sup>10</sup>. However, ethnicity can impact upon some of the causal factors associated with dwelling fires, for example, cooking related fires may be proportionately higher amongst some ethnic groups (Syfire, 2013)<sup>11</sup>.

It is also important to be aware that a community or cultural group consists of individuals, some of whom may align with the cultural norms and practices of the community or cultural group, and some who may not. Therefore it is useful when examining the relationship between ethnicity and fire injury risks to appreciate the social context in which fire injuries occur as well as the statistical analysis of the quantifiable aspects of fire injury incidences. A more thorough understanding of the relationship between ethnicity and accidental dwelling fire risks would support fire and rescue services in making informed decisions regarding fire prevention strategies.

SFRS has produced a [pictorial booklet](#) which contains key fire safety messages and is intended for people who do not read English or for whom English is not their first language. The Service has distributed printed copies across Scotland and it is widely used by its personnel when engaging with communities.

SFRS's website functions well with Google Translate to provide individuals access to its web content in languages other than English.

Consideration of the race characteristic has helped shape the narrative included within the Framework's priorities, including the 'People' section, strategic priority 6. This section discusses race and ethnicity with regard to the SFRS workforce and identifies the continued need for SFRS to progress its work to be an employer for all and continue to build on its Equality and Diversity Charter. The data for staff on ethnicity is routinely collected in SFRS's annual organisational statistics but as it is a voluntary disclosure many staff opt not to disclose this information. The section also discusses the importance of ensuring equality impacts are assessed in the procurement process by service providers.

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<sup>10</sup> [An exploration of community and culture related fire risks](#)

<sup>11</sup> [Community Fire Risk Model - July 2013.PDF \(syfire.gov.uk\)](#)

## **Religion or Belief**

Overall, there is limited fire-related data in relation to the religion or belief of people given that the current Incident Recording System does not routinely capture such information. However fire investigation teams may discuss these factors in their reports where relevant. There is no further evidence available at this time to suggest that the Framework will have a disproportionate impact on the basis of religion or belief.

During a preliminary engagement visit with the Gurdwara Singh Sikh Temple in Glasgow City, SFRS found potential sleeping risks around the use of the building. To minimise these risks, a pre-determined attendance was put in place and local stations briefed on the changes. This initial engagement led to a fire safety open day being provided at the Temple, which resulted in approximately 100 members of the Sikh Community receiving fire safety messages. Home Fire Safety Visits were also arranged and approximately 50 people to date have received lifesaving CPR training. One of the local Crew Commanders, utilised their self-taught knowledge of Urdu to help build these positive relations. SFRS received a letter of commendation from the Gurdwara Singh Group for its work and those involved increased their knowledge and appreciation of Sikh culture and now have a greater understanding of the Sikh Community as a whole.

Consideration of the religion or belief characteristic has helped shape the narrative included within the Framework's priorities including the 'People' section, strategic priority 6. Strategic priority 6 discusses religion and belief with regard to the SFRS workforce and identifies the continued need for SFRS to progress its work to be an employer for all and continue to build on its Equality and Diversity. It also discusses the importance of ensuring equality impacts are assessed in the procurement process by service providers.

## **Gender Reassignment**

Overall, there is limited fire-related data in relation to gender reassignment given that the current Incident Recording System does not routinely capture such information. There is no further evidence available at this time to suggest that the Framework will have a disproportionate impact on the basis of gender reassignment.

Consideration of the gender reassignment characteristic has helped shape the narrative included within the Framework's 'People' section including strategic priority 6. Strategic priority 6 covers gender reassignment with regard to the SFRS workforce and identifies the continued need for SFRS to progress its work to be an employer for all and continue to build on its Equality and Diversity Charter. It also discusses the importance of ensuring equality impacts are assessed in the procurement process by service providers.

## **Sexual Orientation**

Overall, there is limited fire-related data in relation to sexual orientation given that the current Incident Recording System does not routinely capture such information. There is no further evidence available at this time to suggest that the Framework will

have a disproportionate impact on the basis of sexual orientation. However this will be kept under review as part of the monitoring of this EQIA.

As part of its Positive Action Strategy and its commitment to addressing underrepresentation of particular groups within SFRS, the Service delivered its first LGBT specific Recruitment event on 20 January 2021, with the event facilitated by one of its HR Advisors, the Chair of the LGBT Employee Network and its two Senior LGBT Equality Champions.

To ensure SFRS promoted the recruitment event throughout Scotland it ran its own social media campaign, but to ensure further reach, it enlisted the help of various LGBT organisations - for example Hidayah, a charity specifically set up to support LGBTQ Muslims, Stonewall Scotland and LGBT Youth Scotland.

SFRS's ongoing commitment to participating in the Stonewall Diversity Champion programme and submitting to the Stonewall Workplace Equality Index has resulted in a number of improvements with regard to key changes to policy, procedure and internal recording systems, the formalisation and launch of SFRS's LGBT Employee network, LGBT specific awareness training for all senior managers and introduction of visible cues i.e. rainbow lanyards to demonstrate the Service's support for the LGBT community.

Consideration of the sexual orientation characteristic has helped shape the narrative included within the Framework, including the 'People' section, strategic priority 6. Strategic priority 6 covers gender reassignment with regard to the SFRS workforce and identifies the continued need for SFRS to progress its work to be an employer for all and continue to build on its Equality and Diversity Charter. It also discusses the importance of ensuring equality impacts are assessed in the procurement process by service providers.

### **New Fire and Rescue Framework for Scotland**

As well as reaffirming SFRS's obligations under the Human Rights Act 1998 the Framework provides detail on how SFRS must also comply with the Equality Act 2010 and the Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012.

The Framework explains that SFRS should promote workforce diversity through positive action on recruitment, retention and promotion to encourage greater involvement of under-represented groups to develop a workforce and Board that greater reflects the population of Scotland in terms of characteristics such as sex, race, religion or belief, sexual orientation, age, disability, pregnancy and maternity, gender reassignment, marriage and civil partnership, religion or belief. Support and engagement should also be shown with organisations that support youth employment.

The Framework acknowledges that SFRS can reduce inequality by preventing fires and the longer term effects that can worsen social and economic conditions such as homelessness and impact on ability to continue in employment by preventing fires.

In the community, the evidence is that there are people with multiple risk factors for harm, and risk of fire can be one or related to these e.g. poorer health, lower education attainment and disability (SFRS Strategic Plan 2019-22<sup>12</sup>). The Framework explains that SFRS should prioritise fire prevention and wider prevention with these individuals, groups and premises at heightened fire risk to have most impact.

The Framework asks SFRS to take a risk-based approach to most effectively improve safety, with a focus on, but not limited to, fire safety, and contribute to reducing inequalities.

The Framework contains the following strategic priority for SFRS:

- *A priority for SFRS is preventing fires and reducing their human, social and economic impact, using an evidence-based approach to target groups and individuals according to risk and universal population wide activities to achieve improved fire and wider safety. These should contribute to improving community safety, reducing inequality and encouraging sustainable and inclusive growth. SFRS should work with public, private and voluntary organisations; communities and individuals where it can add value and contribute to outcomes.*

## Conclusion

In itself, the next Fire and Rescue Framework for Scotland should have a positive effect on people with one or more of the protected characteristics, particularly given that its primary function is to provide guidance and support to the SFRS on its priorities and objectives, set in the context of the overarching purpose that the SFRS should adhere to in carrying out its functions. It sets out Scottish Ministers' expectations of the SFRS as it continues to modernise as an organisation.

The Framework will have a positive impact on equality as it provides specifically for the improvement of performance across all equality strands at the core of SFRS business objectives. The Framework requires SFRS to build on work already done to recruit, retain and progress individuals from underrepresented groups from across all areas of Scotland and at all levels. The Framework's 'People' section specifically requires that SFRS must ensure equality is mainstreamed across all functions. Greater change in any workforce structure can generally only come about through recruitment and therefore the Framework discusses the need for positive action on recruitment, retention and promotion to encourage underrepresented groups to greater reflect the population of Scotland. The Framework also recognises the need for change to be visible at the top of the organisation and the SFRS Board needs to continue to be aware of protected characteristics during Board Appointment processes and succession planning.

Based upon the evidence gathered throughout the planning process regarding people with one or more of the protected characteristics, it is considered that the Framework is neither directly nor indirectly discriminatory under the Equality Act

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<sup>12</sup> [SFRS Strategic Plan 2019-22](#)

2010. It is not anticipated that the new measures within the Framework themselves will directly impact on individuals with protected characteristics. However, the intention is that the new measures will have a positive impact on individuals with protected characteristics. The Framework states that SFRS will ensure that its decision making and reporting demonstrates how equality issues are considered, including as an element of SFRS's improvement processes.

The Framework makes it clear that SFRS must have due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations between people who share a relevant protected characteristic and people that do not share it.

In line with good practice this assessment will be kept under review.