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## **Equal Pay Audit 2024**

## **Context**

An equal pay audit was carried out by Royal Berkshire Fire and Rescue Service (RBFRS) as recommended by the Equality and Human Rights Commission (EHRC)'s Equal Pay: Statutory Code of Practice.

The equal pay audit goes further than the statutory Gender Pay Gap or Ethnicity Pay Gap reports by providing more information on how individuals are paid at RBFRS and how the individual pay elements are distributed across the various protected groups.

This report assesses the effectiveness of policies and practices with regard to fair pay regardless of gender, ethnicity, age, disability and contract type (i.e. part-time/full-time).

RBFRS' overall approach to determining the pay of its employees is to participate in national collective bargaining for firefighters and fire control staff (Grey Book) through the NJC for Local Government Services and Directors through NJC for Brigade Managers of Fire and Rescue Services.

The NJC for Local Authority Fire and Rescue services currently provides a nationally agreed competence based pay structure, which is set nationally. A locally agreed job evaluation scheme is in place for Grey Book staff. The National Joint Council for Local Government Services sets the framework for the pay and conditions of service for the Fire Authority's Green Book staff. RBFRS have ten grades and posts are allocated to a grade through a process of HAY job evaluation. Staff are appointed to a spinal column point in the appropriate pay grade depending on experience and specific technical skills.

## **Method**

A range of different pay elements were considered over a range of selected reference periods which allowed a comprehensive range of data (as detailed below) to be compiled.

- >>> The 'snap shot' date for basic pay and allowances is the March pay period ending 31 March 2024.
- >> The reference period for overtime payments was 12 months from 1 April 2023 to 31 March 2024.
- >>> The reference period for Spinal Column starting points and merit payments was 24 months from 1 April 2022 to 31 March 2024.

Tables detailing the staff in post at the time of the audit and demographic distribution can be found in Tables 1 and 2 at the end of this report.



Payroll information was provided by Dataplan.

## **Comparators**

In order to assess whether employees with protected characteristics are treated equally meaningful comparators needed to be defined. These comparators are as follows:

- >>> Gender comparator male v female\*
- >>> Contract type comparator full-time v part-time (part-time includes Green Book working less than 37 hrs per week and On-Call (RDS))
- >> Disability comparator no declared disability v declared disability
- >>> Ethnicity comparator white v ethnic minority\*\*
- >> Age groups compared are 25 and under; 26 to 35; 36 to 45; 46 to 55; 56 to 65; 66 and over.
- \* Due to the recommendations outlined in the Equal Pay Statutory Code of Practice RBFRS uses the gender comparators of staff who identify as either male or female. RBFRS have, and continue to use, internal reporting mechanisms which take into account all gender identities and expressions which are not limited to the binary of male and female.
- \*\* RBFRS can only report on ethnicity where staff declare their ethnicity. RBFRS follows the CIPD and Race Disparity Audit's recommendations in this audit, referring to 'ethnic minorities' rather than BME/BAME (black and minority ethnic/black, Asian and minority ethnic) which highlights some groups and omits others. For the purpose of this report, and in line with ethnicity pay gap reporting guidance, 'white' staff include those who declare themselves as 'white other', 'white Irish' and 'white British'.

## **Elements of Pay**

The audit considered a number of pay elements individually, to provide a clear and comprehensive picture of how people are rewarded within RBFRS and whether all groups were treated fairly in these respects. The elements considered were:

- >>> Basic Pay
- Allowances
- >> Overtime
- >> Merit payments
- Spinal Column starting points.



## **Calculations**

As Grey Book and Green Book employees work different hours per week and to take into account those working part-time, all salaries have been calculated as an hourly rate based on the monthly pay data for 31 March 2024.

## Results

## **Basic Pay**

Basic pay is set nationally and therefore any pay differences between Grey and Green book staff reflect this. In this area of pay, the concept of 'equal pay for equal value' is achieved within each contract type by an established method of job evaluation in both Grey Book and Green Book areas.

When considering the organisation as a whole, the audit has shown only a small differential between male and female employees with females earning 1.7% more than males. This can be attributed to lower paid Trainee Firefighters and Firefighters on development pay, the majority of which identify as male.

For Grey Book staff, pay increases as a result of staff passing their apprenticeship or completing their Development and Assessment Pathway. Where there is a delay in assessing the competency of a Grey Book employee, appropriate back pay is made.

Part-time employees earn on average 4.4% more per hour than full-time employees. This relates mainly to Green Book employees and is reflective of the fact that a number of more senior roles (i.e. those Grade 5 and above) are filled by staff on part-time contracts.

Employees who declared they were from ethnic minority groups were measured as a whole and compared with their white colleagues. Staff who have not shared information regarding their ethnicity were not included for the purpose of the equal pay calculations. Basic pay of individuals from ethnic minority groups was 4.5% higher than white employees.

Both the difference between male and female employees and white and employees from an ethnic minority, mirror the findings of the Gender Pay and Ethnicity Pay Gap reports.

The age of an employee does have some effect on basic pay. Average hourly rates per age group are shown in the table below:

Age	Hourly Rate
25 and under	£13.73
26 - 35	£14.81
36 - 45	£18.27



46 - 55	£19.84
56 - 65	£18.28
66 and over	£21.18

This distribution demonstrates that experience (internal or external) is rewarded. The 25 and under age group includes apprentices who received a rate which takes into account the requirement to undertake training and development whilst in post. The mean hourly rate for those in the 56-65 age group is lower as this group contains a wide variety of roles and staff groups from across the service which skews the mean average – i.e. there are a number of both higher and lower paid roles in this group.

Employees who have not shared information regarding a disability or long-term health condition have an average hourly rate that is 7.7% more than employees who have shared information regarding a disability. In this case, it is important to remember that, at the time of the this report being written, only 35 employees have declared a disability (as this is an entirely personal choice) and it is recognised that there may be other individuals who have a disability but do not declare it. This may be due to a number of factors but it should be noted that as a Service we offer support to all our employees regardless of protected characteristics so those needing assistance may not feel it is necessary to declare any disability they may have.

#### **Allowances**

#### **Additional Responsibility Allowances (ARAs)**

ARAs are additional payments made for skills or responsibilities that can be applied and maintained outside of the requirements of an employee's role map but are within the job function of the organisation. These additional responsibilities support delivery of work of particular value to the Service. Staff can receive multiple ARAs for undertaking separate additional responsibilities.

ARAs are mainly paid to Grey Book staff and relate to the national conditions of service (role maps) with amounts determined locally.

The amount payable for each ARA will be determined by the responsible Head of Service taking into account the complexity of the activity, the frequency at which the activity is needed, the cost of payment to the RBFRS and budgetary implications and the added value of the activity. The same ARA amount is paid to each applicable employee undertaking a particular activity. For this reason the percentage of staff receiving an ARA rather than the amount being paid was analysed, as the amounts paid are consistent amounts.

For the purposes of this audit, training allowances, job allowances (such as those paid to Watch Based Station Managers and Area Managers) and all other ARAs are reported as one total amount. Continual Professional Development (CPD), flexi-duty and detachment allowances are reported separately.

The analysis shows that males received 89% of ARA payments. Employees who have declared a disability received 5% of the total ARA payments and those from an Ethnic Minority received 2% of



the total ARA payments. This is broadly consistent with the demographics of the Grey Book workforce.

ARAs can be paid for a variety of reasons, some of which can be attributed to the station an employee works at (for example Boat Crew payments made to staff based at Caversham Road). It is recognised that some stations may not have adequate facilities for female staff which may impact the ability to receive ARAs for some stations. However, the service is committed to improving facilities throughout its property portfolio to ensure it is more accessible for all staff.

Age makes very little difference to the amount of allowances received except for in the 25 and under group. All Wholetime and On-Call (RDS) Firefighters in this age group are trainees or in development, which means they are not eligible to receive ARA payments.

While ARA and other payments are available to all eligible staff based on the role they undertake, it is recognised that the differences identified above are reflective of the imbalance of protected characteristic groups within operational roles (particularly in terms of gender and ethnicity). RBFRS has a comprehensive Equality Diversity and Inclusion (EDI) Action Plan and works closely with the EDI Network and EDI Steering Group to consider actions which will have a long-term positive effect on minority representation.

#### **Continuous Professional Development (CPD)**

The CPD allowance is paid to Grey Book employees only. It can be claimed only when a Firefighter (including Firefighter Control) is competent and has five years' service. Roles from Crew Manager to Area Manager are required to have one years' service at competent level. RBFRS also allows employees to retain their CPD payments during temporary promotion, so support the development of staff and ensure there is no financial disincentive. The amount of the CPD payment is determined nationally and all eligible staff will receive the same amount. For this reason, the proportion of staff receiving CPD payments rather than the amount each group receives was analysed.

Males receive 93% of CPD payments with females receiving 7%. This is broadly consistent with the male/female proportion of the Grey Book workforce.

Full-time employees receive 97% of the CPD payments. This is slightly higher than the proportion of full-time Grey Book employees (88%), but this can largely be explained by the fact that 42% of On-Call (RDS) Firefighters are on trainee and development rates of pay and would therefore not be eligible for CPD payments.

White employees and those with no declared disability receive 93% of CPD payments and staff with a declared disability and staff from an ethnic minority receive 7% of the CPD payments. This is broadly in line with the demographics of the workforce and does not indicate any specific areas of concern.

CPD is not paid to anyone in the 25 and under age group and those in the 26 to 35 age group receive, on average, the lowest proportion of CPD payments (only 9% of staff in this age group receive CPD payments). This could be attributed to the requirement to have the requisite amount of service before claiming CPD payments.



#### Flexi Duty Payments

This payment is made to all Flexible Duty Officers based on the role undertaken regardless of any protected characteristic. However it is recognised that this group of staff are predominantly white males and measures to address underrepresentation of the operational workforce are incorporated into the EDI Action Plan.

#### **Detachment Payments**

These payments are made to Grey Book staff who are required to work at a station away from their 'home' station. Males receive 92% of the total detachment payments made with females receiving 8%. The percentage of the amount of detachment payments made to females is larger than the proportion of the female operational workforce as a whole.

Full-time employees receiving 100% of the payment due to the fact RBFRS does not have any part-time employees working in the Wholetime duty system (On-Call (RDS) receive an hourly rate regardless of the reporting station).

A further review of detachment payments was undertaken following recommendations in the 2022 Equal Pay Audit in order to establish why males receive proportionately more detachment payments than females.

The main reasons for detachments were the need for specific skills such as driving, the need for Junior Officers, or Breathing Apparatus qualifications. The detachment payments this period remain consistent with the reasons identified in the 2022 Equal Pay Audit. It should be noted that not all reasons for detachments are annotated in FireWatch, or limited information is provided as to the reason for detachments therefore caution should be taken with regard to the reasons quoted.

No pattern can be established to suggest that females are disadvantaged in terms of detachments for specific skills based on the data available. Courses and the ability to undertake activities such as driving are available to all staff, and work is ongoing through positive action events to increase the diversity of the workforce in general. There is a focus on promotion activity to ensure it is inclusive for all, but it may be valuable to ascertain amongst female operational staff whether barriers exist to promotion and accessing courses for specialist skills, and address this where appropriate.

The age group receiving the highest percentage of these payments is 36 to 45 years. This may be explained by the fact that this groups makes up a large proportion of the operational workforce. A significant number of those in the higher age groups hold higher ranks (Station Manager (B) to Chief Fire Officer) and are not therefore detached.

#### **Grey Book Overtime**

This audit focused on pre-arranged overtime for Grey Book staff, which is needed to provide specific skills to enable operational efficiency and meet the qualifications for the role being offered as overtime. Pre-arranged overtime is offered on a regular/consistent basis and therefore offers more data for effective analysis.



Eligible employees are Wholetime Firefighters and Control. On-Call (RDS) employees are not included in the calculations if they cover additional shifts, this would be shown as working hours rather than an overtime payment.

The analysis shows that overtime is shared relatively equally across all types of employees, and differences are not significant enough to suggest any underlying equal pay issues amongst operational staff. To summarise:

- 1. Female employees receive 13% of Grey Book overtime and make up 14% of the Grey Book workforce.
- 2. Part-time employees receive 1% of Grey Book overtime and make up 0.7% of the Grey Book workforce (this figure represents the part-time employees in Thames Valley Fire Control Service).
- 3. Employees declaring a disability receive 8% of this overtime and make up 6% of the workforce.
- 4. The highest average overtime is undertaken by the 36-45 age group, which is reflective of this age group making up the highest proportion of the operational workforce.

#### **Green Book Overtime**

A total of 41 staff (24% of Green Book staff) worked overtime in the reference period. Employees in Transport/Fleet and ICT (all of whom are male) undertake contractual overtime or participate in an out of hours rota which attracts overtime. As this groups accounts for 39% of all overtime worked, the statistics are presented both including and excluding these staff groups as this distorts the overall overtime data for Green Book staff. Amounts of overtime paid are dependant the Grade an employee works. An employees grade is determined through HAY evaluation, therefore RBFRS are confident that staff are being paid equal pay for equal work. For the purpose of analysis in this section therefore, the proportion of overtime worked was considered.

55 occasions of overtime are worked by females (40%), however 61% of Green Book employees are female. If Transport/Fleet and ICT employees are excluded, 66% of overtime is worked by females. The Human Resources/Resourcing and Development department, the workforce of which is mainly female, undertake the majority of this overtime to cover out of hour's careers events and weekend recruitment activity. Other overtime activity was related to additional activity in specific departments (for example the awards ceremony).

92% of Green Book overtime is worked by white employees who make up 81% of the Green Book workforce. If Transport/Fleet is excluded 87% is worked by white employees.

Employees who have declared a disability, who make up 6% of Green Book employees, undertake 1% of Green Book overtime or 2% if Transport/Fleet is excluded.

14% of Green Book staff are part-time and work 5% of Green Book overtime or 6% if Transport/Fleet/ICT are excluded. It is difficult to ascertain why this might be but it may be that part-time employees have requested to work less hours and may not offer extra hours which would not attract an enhanced rate.

These differences are not at a significant level to suggest any equal pay issues and broadly follow the demographics of the workforce. The majority of overtime is role related and open to all staff



working a particular contract (or due to the requirements of a specific department where applicable). There is nothing to suggest any bias in terms of gender, ethnicity or part time status.

## **Merit Payments**

Merit payments are made to reward individuals who have taken on additional duties or performed exceptionally well and include merit payments for ongoing duties that are made on a monthly basis. In this 24 month period 120 merit payments were made. It is open to both Green Book and Grey Book employees. All proposed payments are reviewed by HR to ensure consistency of approach and to ensure that there is no obvious bias.

In general, all types of employees are in receipt of merit payments. The audit showed that 61% of all payments were made to females and 39% were made to males. Females make up 26% of the total workforce, so in this period have received a higher proportion of merit payments when compared to the percentage of the total workforce. When analysing the reasons for the merit payments, nothing to suggest discrimination against males could be found as the merit payments were for a variety of specific reasons (for example recognition of taking on additional responsibilities following staff absence, or in recognition of undertaking specific pieces of work).

88% of these payments were paid to white employees (who make up 95% of the workforce) with 12% being paid to those from ethnic minority groups (who make up 5% of the workforce). This broadly coincides with the demographics of the workforce. The reasons for merit payments were in line with policy and for a variety of reasons (as detailed above).

The percentage of merit payments made to part-time employees (11%) was significantly less than that paid to full-time employees, however this is reflective of the overall workforce - part-time employees including On-Call (RDS) make up 14% of the workforce. There is nothing to indicate that part time employees are less likely to receive merit payments for taking on additional responsibilities, as several of these merit payments were for this specific reason. This will however be monitored on an ongoing basis.

Merit payments are evenly distributed over the age group categories and broadly coincide with the overall age distribution across the service.

One employee who has declared a disability received a merit payment (accounting for 0.8% of merit payment received). While there is nothing to suggest that those staff declaring a disability are disadvantaged in terms of receiving merit payments, this is lower than the overall proportion of the workforce with a declared disability (5.5%), and this will be monitored moving forward.

Average amounts of merit payments were fairly even across the various categories. The average merit payment for female staff was £726.14 and the average payment for males was £980.55. Individuals from ethnic minority groups received an average payment of £910.71 while white employees received an average payment of £814.57. The distribution of one-off merit payments, these were broadly consistent with the makeup of the workforce. The amounts paid were also consistent across these groups.

There is nothing to suggest any specific gender or ethnicity bias in awarding merit payments as the reason for awarding merit payments can differ. The reasons why payments can be made are specifically outlined in policy and relate to a piece of work or one-off task which may lie outside the



normal job parameters, sustained high performance within an employee's normal job or undertaking temporary additional responsibilities where an ARA is not applicable. These payments are discretionary, and care should be taken when trying to directly compare amounts as payments can be for a variety of reasons, which would attract differing levels of payments. The value of merit payments being awarded are monitored in HR to ensure consistency.

## **Spinal Column Starting Points**

In Green Book areas, there is an option to recognise experience or specific technical skills by offering a starting salary within the evaluated grade but above the bottom of the band. An analysis of starting points over 24 months can be seen in Table 3 at the end of this report. Table 3 details the spinal starting points for those appointed to Green Book roles on the pay spine. It therefore does not include those appointed to roles conditioned to the Grey Book, or roles such as the summer internship scheme or apprentices who are appointed to alternative pay grades.

In the reference period, 16 individuals started at the top of the band, the majority of which were current or ex-members of staff with high levels of experience working within the organisation. The remaining staff were appointed to areas within the organisation that required specialist skills or were in hard to recruit to roles.

22 individuals were appointed to points in the middle of their respective pay bands. This was in recognition of previous specific experience either within RBFRS or externally.

Ex-members of staff are expected to apply for and compete with external candidates for any roles advertised and are subject to the same application and competitive selection process as any candidates new to the Service.

Those appointed to the bottom, middle or top of their pay band occupied a range of roles and grades and are spread fairly evenly across the categories of employees reviewed.

The variance among the age groups can be attributed to the fact that the older age groups are likely to start with more experience from other industries, whilst those under 25 are likely just starting their careers or undertaking their first job following college or university studies.

A central log held by HR details the justifications for Spinal Colum starting points to ensure that the is no bias for appointing staff above the bottom of the grade. This is monitored by HR on an ongoing basis.

## **Conclusions**

This audit has shown that in the areas of basic pay, overtime and merit payments employees are treated fairly regardless of their personal characteristics. Basic hourly pay for females is slightly higher (1.7%) than males. Part-time employees on average have a higher basic hourly rate than full-time employees and employees from ethnic minority groups receive a higher basic hourly rate than white employees.

In the area of allowances, all allowances support the delivery of work of particular value to the Service and are mainly paid to operational personnel. Payments are in line with the demographic



make-up of the Service, however the under representation of protected characteristics groups in operational roles is acknowledged and more work is being undertaken in this area through the Equality Diversity and Inclusion Action Plan.

## **Actions**

The following actions are currently underway.

Action	Owner	Timescale	How Monitored	Status of Action
1. Commence consultation process to remove the inequality of the uniform payment to TVFCS staff	HR / GM (TVFCS)	Q4 2019/20	Proposal report to SLT followed by implementation plan as agreed	Compete – uniform payment removed from TVFCS staff in December 2020
2. Review CPD application process	HR	31 Dec 2019	Proposal to be submitted to Head of HR and L&D and Head of Service Delivery.	Complete – new policy published June 2020
3. Develop enhanced monitoring system for Spinal Column starting points and reasons thereof to ensure elimination of any potential unconscious bias.	HR	31 Oct 2019	Spreadsheet redesigned accessible on request and reviewed on a quarterly basis by HR Manager.	Complete – central record held in HR to monitor and analyse Spinal Column starting points. Monitored on an ongoing basis
4. Develop enhanced monitoring system to monitor merit payments and reasons thereof to ensure the elimination of unconscious bias.	HR	31 Oct 2019	Data is entered into spreadsheet and reviewed on a quarterly basis by HR Manager.	Complete – central record held in HR. Monitored on an ongoing basis by Senior HR Adviser – Service Provision
5. Monitor Spinal Column starting points and reasons on an ongoing basis to ensure	HR	1 Nov 2019	Data is entered into spreadsheet and reviewed on a	Ongoing



the elimination of unconscious bias.			quarterly basis by Senior HR Adviser.	
6. Monitor merit payments and reasons on an ongoing basis to ensure the elimination of unconscious bias.	HR	1 Nov 2019	Data is entered into spreadsheet and reviewed on a quarterly basis by Senior HR Manager.	Ongoing
7. Initiatives to address underrepresentation of females and ethnic minority groups	HR	1 Nov 2019	Ongoing initiatives linked to EDI Action Plan, Gender Pay Gap and Ethnicity Pay Gap reports	Ongoing Monitored through EDI Action Plan via EDI Steering Group
8. Review of detachment payments to ascertain why males are paid proportionally more than females	HR	31 March 2023	Monitored on an ongoing basis during Equal Pay Audits	Reviewed August 2023 and Detachment payments reviewed – payments correlate with the proportion of the workforce, and are due to a specific skill required. Courses for specialist skills are available to all staff.
9. Collection of equality monitoring data to enhance reporting	HR/EDI		Captured on an ongoing basis at recruitment and annually	Ongoing
10. Review whether any barriers exist for underrepresented operational staff to access promotion activities or courses for specialist skills	HR/Service Delivery		31/03/2025	



11. Monitor staff declaring a disability receiving merit	HR	Ongoing	Ongoing
payments			

## **Appendix**

#### Table 1: Staff in post by job type

Please note, this does not include staff currently on career breaks or maternity and not receiving payments. These figures are based on data from 31 March 2024.

Job Type	Total
All employees receiving payment	640
Wholetime only	371
On-Call only	53
Control only	41
Green Book only	175
Dual Contract Control + Green Book	1
Dual Contract Wholetime + Green Book	2
Dual Contract Wholetime + On-Call	16
Dual Contract On-Call + Green Book	1
Dual Contract Wholetime + Control	1

#### **Table 2: Distribution**

Please note, these figures include eight individuals who were on career breaks or maternity and therefore not receiving a full salary payment. These figures are based on data from 31 March 2024.

al employees 640
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Gender	
Male	475
Female	164
Other	1
Disability	
Declared disability	35
No declared disability	605
Contract Type	
Part-time*	79
Full-time	561
* includes on-call staff	
Ethnicity	
Asian or British Asian Indian	5
Asian or British Asian Pakistani	1
Asian or British Asian Other	3
Black or Black British African	5
Black or Black British Caribbean	4
Black or Black British Other	1
Chinese	2



Mixed White and Asian	3
Mixed White and Black Caribbean	4
Other	1
Other Mixed	3
Unknown	0
White British	587
White Irish	3
White Other	18
Age	
25 and under	55
26 – 35	159
36 – 45	188
46 – 55	177
56 – 65	57
66 and over	4

# **Table 3: Spinal Column Starting Points by Category Gender**

Spinal Column Starting Point	Total Staff	Total Percentage/Percentage of Category
Bottom	21	36%
Female	11	52%
Male	10	48%



Middle	22	37%	
Female	15	68%	
Male	7	32%	
Тор	16	27%	
Female	6	38%	
Male	10	62%	
Grand Total	59	100%	

## **Ethnicity**

Spinal Column Starting Point	Total Staff	Total Percentage/Percentage of Category
Bottom	21	36%
Ethnic Minority	2	9%
White	19	91%
Middle	22	37%
Ethnic Minority	3	14%
White	19	86%
Тор	16	27%
Ethnic Minority	1	6%
White	15	64%
Grand Total	59	100%

## Disability

Spinal Column Starting Point	Total Staff	Total Percentage/Percentage of Category
Bottom	21	36%
No	14	66%
Yes	1	6%



Not Stated	6	28%
Middle	22	37%
No	15	68%
Yes	0	0%
Not Stated	7	32%
Тор	16	27%
No	13	81%
Yes	1	6%
Yes Not Stated	2	6% 13%

#### Part Time/Full Time

Spinal Column Starting Point	Total Staff	Total Percentage/Percentage of Category
Bottom	21	36%
Full Time	16	76%
Part Time	5	24%
Middle	22	37%
Full Time	17	77%
Part Time	5	23%
Тор	16	27%
Full Time	14	88%
Part Time	2	12%
Grand Total	59	100%

#### Age

Spinal Column Starting Point	Total Staff	Total Percentage/Percentage of Category
Bottom	21	36%



25 and under	7	33%	
26-35	5	24%	
36-45	1	5%	
46-55	4	19%	
56-65	4	19%	
66 and over	0	0%	
Middle	22	37%	
25 and under	0	0%	
26-35	9	41%	
36-45	4	18%	
46-55	5	23%	
56-65	4	18%	
66 and over	0	0%	
Тор	16	27%	
25 and under	0	0%	
26-35	3	19%	
36-45	4	25%	
46-45	5	31%	
56-65	4	25%	
66 and over	0	0%	
Grand Total	59	100%	



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