



EQUALITY IMPACT ASSESSMENT (EIA)

EIA Register Reference Number:	<i>EIA-162</i>
Name of activity: (i.e. change, policy, procedure, project)	Dignified Workplace Standards
Directorate/department:	Estates
Name of department head/policy owner/project lead:	Paul Brooks
Name(s) of person(s) completing this assessment:	Claudia Trott
Date of commencement of assessment:	01/09/2025
Dates of Review: (please complete the review log at time of each review)	10/3/2026

1. What is/are the aims/purpose and intended outcomes of the activity you are assessing?

The Dignified Workplace Standards for Sanitary and Rest Areas (previously EDI Minimum Standards) were initially introduced in 2023 to provide a baseline for our facilities to meet the diverse needs of our workforce. These standards are critical in ensuring RBFRS meets its legal obligations under

- The Equality Act 2010,
- The Worker Protection Act 2023 (Amendment to the Equality Act),
- Workplace (Health, Safety and Welfare) Regulations 1992, and
- Our ongoing duty to protect and promote the health, safety, and wellbeing of all employees.

A full review and update of the standards have been conducted in response to:

- The Supreme Court Ruling clarifying the legal definition of sex under the Equality Act 2010, and
- The implementation of the Worker Protection Act, which strengthens employers' responsibilities to prevent harassment in the workplace.

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The updated standards take into consideration the current composition of the operational workforce, Equality, Diversity and Inclusion requirements and Health and Safety obligations.

2. Who is/may be affected by the activity, and how? Consider applicants, service users, members of the public, RBFRS employees, partner organisations etc.

Please refer to the completion guidance.

Has any consultation taken place with those who may be affected in order to inform this assessment?

Station based staff – the standards relate to fire stations across RBFRS and the requirements for sanitary and rest areas. Therefore, Wholetime staff will be affected as it determines how their space is used.

Estates – Changes will need to be implemented to our facilities to meet the standards.

Information

3. What information is already available that tells you what impact the activity has/will have on people? Consider quantitative and qualitative data, consultation, research, complaints etc. What does this information tell you?

Please list any policies that are related or referred to as part of this assessment.

Is there any equality data relating to this activity? Please also consider any further data that may inform your assessment i.e. consultations, complaint data, external research.

Please refer to the central register to identify any related existing EIAs.

Please describe any additional research undertaken to inform this assessment.

These sources of information will be used to inform your assessment of the activity.

The Equality Act 2010

The Equality Act 2010 mandates employers to make reasonable adjustments and prohibits discrimination based on sex, gender reassignment, disability and other protected characteristics.

The Equality Act defines gender reassignment as a protected characteristic (s.7(1)). People who are proposing to undergo, are undergoing or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex have the protected characteristic of gender reassignment. For the purpose of the report and to align with the UK Equality and Human Rights Commission (EHRC) guidance we refer to someone with the protected characteristic of gender reassignment as ‘trans’.

The Worker Protection Act 2023 (WPA) amendment to the Equality Act 2010

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The Worker Protection Act, effective from October 2024 strengthens employer duties under the Equality Act 2010, particularly around proactive prevention of workplace harassment.

Sexual Harassment Risk Assessment

As a result of the WPA a risk assessment was completed identifying sleeping facilities an area of highest risk.

Sexual Harassment Site Audit

An audit was completed into our stations across the country to identify where facilities might need changes. This has helped inform the standards.

Supreme Court Ruling, 16 April 2025 in For Women Scotland Ltd v The Scottish Ministers

The Supreme Court Ruling clarified the legal definition of sex for the purpose of the Equality Act. The ruling was that the definition of sex in the Equality Act 2010 (the Act) should be interpreted as 'biological' sex only. This means that, for the purposes of the Act, a person's legal sex is the one that was recorded at their birth. According to the ruling, obtaining a Gender Recognition Certificate (GRC) does not change your legal sex for Equality Act purposes.

Equality and Human Rights Commission draft code of practice

Following the ruling the EHRC has issued a draft code of practice with practical implications for employers.

- Toilets, showers and changing areas must be single sex unless each facility is in a lockable private room.
- Trans women (biological men) should not use women's facilities, and trans men (biological women) should not use men's facilities, to preserve the single-sex nature of those spaces.
- Where possible, mixed-sex facilities (gender neutral individual private space) should be provided in addition to single-sex ones to ensure dignity and access for all.

The EHRC has since provided explicit [guidance on communal accommodation](#)

- Applies to dormitories, shared sleeping areas, and any residential accommodation where privacy requires single-sex use.
- Trans individuals should not be placed in facilities that conflict with their biological sex under the Act.
- Suitable alternatives should be considered to avoid exclusion or indirect discrimination.
- Trans individuals remain protected under the Equality Act from discrimination due to gender reassignment, regardless of GRC status.
- They are also protected from sex discrimination based on both their birth sex and their acquired gender, including:

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- Direct discrimination by association
- Indirect discrimination (s.19A)
- Harassment related to sex (s.26)

We have interpreted the drafted guidance to mean single sex spaces must be provided and must always remain single sex. To reduce the risk of discrimination and maintain the safety of trans employee’s individual occupancy spaces must also be provided. This meets a proportionate means of achieving a legitimate aim as it is protecting the dignity and safety of all employees especially considering sexual harassment.

RBFRS Workforce Stats Q1 2025/26 – Wholetime

GENDER	%
Female	8.4%
Male	83.6%
Prefer not to say	7.9%
Grand Total	100.0%

4. What impact may this activity have on the following groups?

Assessment of impact on groups in **bold** is a legal requirement, but it is important to consider the potential impacts of your activity on all of the following groups to ensure that your activity does not have unintended consequences.

	Neutral Impact	Positive Impact	Negative Impact	Please provide detail of potential impact(s), including any relevant evidence from the information section above:
Sex (Men and Women)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Positive impact on both men and women as it provides clearly defined spaces for women only and men only promoting safety, privacy and dignity. In addition, all new builds and remodels will be entirely individual occupancy. Positive impact for women as provides additional

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				<p>adequate space for women at fire stations across the county.</p> <p>Potential negative impact for men due to changes in how space is allocated however, all stations provide enough space for a full male watch.</p> <p>Potential negative impact if the percentage of women increases. The standards will be regularly reviewed against any new recruitment cycles to ensure facilities remain dignified.</p>
Race (All Racial Groups)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	There is no anticipated impact on this group.
Disability (Mental, Physical, Neurodiversity and Carers of Disabled people)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Positive impact identified as the desirable standard includes accessible WCs and showers improving access for disabled people.</p> <p>Potential negative impact identified as changes to meet the minimum may reduce space for individual occupancy sleeping. This will be captured in individual station EIAs.</p>
Religion or Belief	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Positive impact identified as the desirable standards I which all new builds and remodels will meet provide individual occupancy dorms which improves privacy and

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	Neutral Impact	Positive Impact	Negative Impact	Please provide detail of potential impact(s), including any relevant evidence from the information section above:
				can be a private space for prayer or reflection.
Sexual Orientation (All diverse sexual orientations)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Potential negative impact identified as lesbian, gay and bisexual people may feel that single sex dorms reinforce assumptions about attraction and risk e.g. assuming issue only arise in mixed sex spaces.</p> <p>Potential negative impact identified if individuals feel uncomfortable with being in a dorm with the same sex if they fear prejudice or bullying about their orientation.</p>
Pregnancy and Maternity (Includes new mothers and those returning to the workplace)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Positive impact identified as the standards provide more private spaces for women who may be pregnant or new mothers.
Marital Status (Married and Civil Partnerships)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No impacts identified.
Gender Reassignment and Trans People (Includes non-binary identities and all other diverse gender identities/expressions)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Following the supreme court ruling trans individuals must use the facility associated with their birth sex. As a result, at least one individual occupancy room must be provided as a minimum so that trans individuals have a space where they do not

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				<p>have to be uncomfortable or feel they are in the 'wrong' dorm.</p> <p>Potential negative impact identified as trans people may feel excluded in gendered spaces.</p> <p>Positive impact identified as the desirable standard provides individual occupancy for all and no decisions will need to be made based upon someone sex and gender.</p>
Age (People of all ages)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No adverse impacts identified. The changes support privacy and dignity for all.
People in different family circumstances (including those with caring responsibilities)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No adverse impacts identified. The changes support privacy and dignity for all.
People in different social circumstances (including socio-economic factors i.e. poverty, isolation and digital exclusion)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No adverse impacts identified. The changes support privacy and dignity for all.
Different employee groups (including consideration of on-call staff, grades, contract status.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The standards apply for our Wholetime staff only.

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	Neutral Impact	Positive Impact	Negative Impact	Please provide detail of potential impact(s), including any relevant evidence from the information section above:
Also consider non-employee groups i.e. casual workers, volunteers)				
Other – this may include consideration of other factors as relevant to the activity such as unemployment, homelessness, urbanisation, rurality, health and wellbeing implications. Please see completion notes for further guidance.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click or tap here to enter text.

5. What further research or consultation is needed to check the impact/potential impact of the activity on different groups? If needed, how will you gather additional information, and from whom? Please refer to the EIA guidance.

No further consultation required. The standards ensure we are legally compliant and reducing the risk of sexual harassment.

The standards were created in consultation with the EDI Lead, Health Safety and Wellbeing Manager and Service Delivery.

Work will continue between the EDI Lead, HS&W, Service Delivery and Estates to regularly review the standards in line with legislation and the make up of the workforce.

Summary of Assessment

6. Taking account of the assessment above, have any negative and/or disproportionate impacts been identified? If so, what amendments will you make to the activity?

Sex

Impact: Less spaces for men to use.

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Mitigation: Enough space across all stations is provided for a full male watch. Men can use the individual occupancy gender neutral spaces if not required by a trans individual or if there are additional females on the watch.

Impact: Potential negative impact if the percentage of women increases.

Mitigation: The standards will be regularly reviewed against any new recruitment cycles to ensure facilities remain dignified.

Disability

Impact: Potential negative impact identified as changes to meet the minimum may reduce space for individual occupancy sleeping which may be required as a reasonable adjustment.

Mitigation: Reasonable adjustments will continue to be provided. If there is a challenge with space, station transfers may need to be considered but this would be managed on a case by case basis.

Sexual Orientation

Impact: Lesbian, gay and bisexual people may feel that single sex dorms reinforce assumptions about attraction and risk e.g. assuming issues only arise in mixed sex spaces.

Impact: If individuals feel uncomfortable with being in a dorm with the same sex if they fear prejudice or bullying about their orientation.

Mitigation: RBFRS grievance policy outlines our zero-tolerance approach to bullying and harassment.

Gender Reassignment

Impact: Trans people may feel excluded in gendered spaces.

Mitigation: The standards apply to areas that are rest and sanitary areas only. The mess room is for socializing. An individual occupancy sleeping space will be provided across all stations so an individual doesn't feel like they are in a position against their gender. Estates will be reviewing the priority of the refurbishment projects to ensure those that need most advancement are prioritized.

7. After these amendments (if any) have been made, is/will there still be a negative impact on any group?

Yes

No

If No, go to section 9.

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If Yes, please explain:

Click or tap here to enter text.

8. Can commencing or continuing the activity without further amendment be justified? If so, how? Please refer to the guidance documents for further information.

Click or tap here to enter text.

9. How can you ensure that any positive or neutral impact is maintained?

Frequent review of the standards especially when workforce diversity changes as a result of recruitment campaigns.

10. How will you monitor the impact of the activity in future? Please identify timelines and responsible owner for monitoring, including detail of links to project/service plans if relevant.

Frequent review of the standards especially when workforce diversity changes as a result of recruitment campaigns. Monitoring feedback from staff. Will be an item on the EDI steering Group agenda.

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Action Plan

Following the assessment, please complete the action plan below.

Action Plan Owner: Claudia Trott	Commencement date: 01/09/2025	Sign off date: 26/09/2025 Please ensure all actions are completed before sign-off.
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As a result of conducting this assessment, what actions are proposed to remove or reduce any negative impact identified?

Action Plan

Identified Impact:	Recommended Actions:	Responsible Lead:	Target Completion Date:	Completion Date:
Frequent review	Review dates of standards to be set.	Claudia Trott	30/09/2025	26/09/2025
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Review Log

Please ensure that you update the action plan accordingly as a result of any changes to the assessment.

Date of Review:	Reason for Review: (i.e. outcomes of consultation, further research conducted, change to activity etc.)	Outcome of Review: (please describe resulting changes to EIA)
26/09/2025	SLT approval	Following presentation of the standards at SLT the acceptable column was removed with just a minimum and desirable to reduce ambiguity.
10/03/2026	Regular review	No changes to standards or impacts. Workforce remains relatively unchanged and no further changes in station facilities. Next review when SAIF programme is agreed,
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Admin

Please send the first draft and any further amended versions to Business Support to be held in the central register.

Check this box if you have undertaken research as part of this assessment that may be of use to others in completing other equality impact assessments:

Append this equality impact assessment as necessary to project reports, business cases and other documents as relevant to governance routes.

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