



**Agenda
for the Meeting
of the
Audit and Governance Committee**

Monday, 24th January 2022

At

6.30 pm

RBFRS Headquarters
Lynda Kenyon Suite
Newsham Court
Pincents Kiln
Calcot
Reading
Berkshire
RG31 7SD

For further information regarding this meeting, please contact:

Committee Team

0118 938 4611

E-Mail at committeeteam@rbfrs.co.uk

Headquarters, Newsham Court, Pincents Kiln, Calcot, Reading, Berkshire RG31 7SD



MEETING: Audit and Governance Committee Meeting

DATE AND TIME: Monday, 24th January 2022, at 6.30 pm

VENUE: Lynda Kenyon Suite
RBFRS Headquarters
Newsham Court
Pincents Kiln
Calcot
Reading, Berkshire RG31 7SD

S U M M O N S

You are hereby summoned to attend the meeting of the Royal Berkshire Fire Authority at the time, date and venue indicated above, when it is proposed to deal with the business set out in the enclosed Agenda.

A handwritten signature in black ink, appearing to read 'Graham Britten'.

GRAHAM BRITTEN
Monitoring Officer

To: Members of the Audit and Governance Committee:

| | |
|--------------------------------|-----------------------------|
| Councillor Anne Chadwick | Councillor Tony Linden |
| Councillor Avtar Cheema | Councillor Harjinder Minhas |
| Councillor Christine Bateson | Councillor Garth Simpson |
| Councillor Jane Stanford-Beale | Councillor Simon Werner |
| Councillor Tina McKenzie-Boyle | |

Copy to: Senior Leadership Team (SLT), Royal Berkshire Fire and Rescue Service

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AGENDA

- 1. Apologies for Absence**
- 2. Declarations of Interest**

Purpose:

To receive Declarations of Interest from Councillors relating to items to be considered at the meeting, in accordance with the provisions of the Fire Authority's Local Code of Conduct, and any from Officers.

- 3. Minutes of the Meeting held on 20 October 2021 (Pages 7 - 14)**

Recommendation:

That the Minutes of the meeting and any recorded actions held on 20 October 2021, be confirmed as a correct record and signed by the Chairman.

- 4. Consideration of any matters properly referred to this Committee for decision**

- 5. Internal Audit Update (Pages 15 - 42)**

Recommendation:

To note the findings as presented in RSM's Progress Report.

- 6. External Audit Update (Pages 43 - 88)**

Recommendation:

To note the contents of the Audit Planning Report in Appendix A.

7. Emergency Services Mobile Communications Programme - Presentation

Purpose:

To receive a presentation on the update of Emergency Services Mobile Communications Programme.

8. Pay Policy Statement 2022/2023 (Pages 89 - 106)

Recommendation:

To note and recommend approval of the RBFA Pay Policy Statement 2022/2023 to the Fire Authority meeting on 15 February 2022.

9. Member Code of Conduct Review and Consultation (Pages 107 - 134)

Recommendation:

To agree a six week consultation on the draft RBFA Member Code of Conduct, and that the findings of the consultation are brought back to the Committee for recommendation to the Fire Authority.

10. Grievance, Bullying and Harassment Policy; Anti-Fraud, Bribery and Corruption Policy; Employee Code of Conduct; Behavioural Competency Framework (Pages 135 - 196)

Recommendation:

To approve the revised Grievance, Bullying and Harassment Policy and Anti-Fraud, Bribery and Corruption Policy, subject to any further amendments the Committee may wish to make and note the changes to the Employee Code of Conduct and the Behavioural Competency Framework.

11. Gender and Ethnicity Pay Gap Reports 2021 (Pages 197 - 222)

Recommendation:

To note the Gender Pay Gap Report, Gender Pay Gap Action Plan and Ethnicity Pay Gap Report and agree that the Gender Pay Gap Report and the Ethnicity Pay Gap Report are published on the RBFRS website.

12. Local Pensions Board Six Month Update (Pages 223 - 228)

Purpose:

To note the Local Pension Board six month update.

13. Quarterly Performance Report - Quarter Two (Pages 229 - 232)

Purpose:

To provide the Committee with an overview of Royal Berkshire Fire and Rescue Service's (RBFRS) Quarter Two performance for the 2021/22 financial

year.

Quarter Two Performance Report (Appendix A) is printed under a separate cover.

14. Date of next meeting

Wednesday, 23 March 2022, at 6.30pm, RBFRS Headquarters, Newsham Court, Pincents Kiln, Calcot, Reading, Berkshire RG31 7SD.

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MINUTES OF THE MEETING OF THE AUDIT AND GOVERNANCE COMMITTEE



Held on Wednesday, 20th October 2021, at 6.30 pm
 Royal Berkshire Fire and Rescue Service (RBFRS) Headquarters
 Newsham Court, Pincents Kiln, Calcot, Reading RG31 7SD

- Members:**
 (*present)
- * Councillor Christine Bateson
 - * Councillor Jane Stanford-Beale
 - Councillor Tina McKenzie-Boyle
 - * Councillor Anne Chadwick
 - * Councillor Avtar Cheema
 - * Councillor Tony Linden
 - * Councillor Harjinder Minhas
 - Councillor Garth Simpson
 - Councillor Simon Werner
 - * Councillor Dennis Benneyworth (substitute)
 - * Councillor Colin Dudley (substitute)

- In Attendance:**
- Mark Arkwell (Deputy Chief Fire Officer, DCFO)
 - Andrew Brittain (External Auditors, Ernest and Young (EY))
 - Alex Brown (Head of Property Capital Projects and Estates, HPCP&E)
 - Conor Byrne (Head of Finance and Procurement, HF&P)
 - Becca Chapman (Data, Performance and Risk Manager, DP&R)
 - Daniel Harris (Internal Auditors, RSM)
 - Becci Jefferies (Head of Human Resources and Learning and Development, HHR&L&D)
 - Allison Kennett (External Auditors, Ernest and Young (EY))
 - Andrew McLenahan (Head of Facilities, Fleet and Equipment)
 - Katie Mills (Director of Corporate Services, DCS)
 - Hannah Sheehan (Democratic Support Assistant, DSA)
 - Nikki Richards (Deputy Chief Executive, Dep ChEx)
 - Tony Vincent (Head of Business and Information Systems, HBIS)

19. APOLOGIES FOR ABSENCE

Apologies for absence were received from Councillors Bateson, McKenzie-Boyle and Simpson. Councillors Dudley and Benneyworth attended as substitutes.

Councillor Tony Linden, as Vice Chairman, presided over the meeting in the Chairman's (Councillor McKenzie-Boyle) absence.

20. DECLARATIONS OF INTEREST

Action

There were no Declarations of Interest from Councillors relating to items to be considered at the meeting, in accordance with the provisions of the Fire Authority's Local Code of Conduct, and any from Officers.

21. MINUTES OF THE MEETING HELD ON 31 MARCH AND 19 JULY 2021

Katie Mills, Director of Corporate Services (DCS), confirmed that the action on page 13 of the agenda pack was completed.

RESOLVED that the Minutes of the meeting held on 30 June, and 19 July 2021, be approved as a true and correct record and signed by the Chairman.

22. CONSIDERATION OF ANY MATTERS PROPERLY REFERRED TO THIS COMMITTEE FOR DECISION

There were no matters of consideration referred to this Committee for decision.

23. INTERNAL AUDIT UPDATE

Conor Byrne, Head of Finance and Procurement (HF&P), introduced the report, stating that one audit has been completed and finalised since the last Committee meeting. The audit examined performance management at Hub level. Overall, RSM's review identified that the Service has in place a well-designed control framework for managing performance at Hub level. RSM also issued its second highest assurance opinion in relation to the audit.

Dan Harris, Internal Auditor (RSM), highlighted page 26 of the Internal Audit Progress Report outlining the actions arising from the audit, 9 low priority actions and 1 medium priority action.

Dan Harris also highlighted page 32 stating that the audit was undertaken to review Performance Management within the Hub Model, as part of the Internal Audit Plan for 2021/22. Overall the review identified that the Service has a well-designed control framework, this is supported by the approval of objectives within Stations Plans and Local Safety Plans (LSPs).

Councillor Dudley asked whether Hub plans had been altered to take the effect of Covid-19 into consideration. Doug Buchanan, Assistant Chief Fire Officer (ACFO), explained that plans had been altered this financial year and are continually monitored. He said that the audit gave assurance and that he was pleased with the outcome. He also added that there were no major concerns and that he was confident that the actions could be easily remedied.

The Vice-Chairman moved the recommendation and it was seconded by Councillor Stanford-Beale.

RESOLVED that the findings as presented in RSM's Progress Report be noted.

24. AUDIT RESULTS REPORT AND STATEMENT OF ACCOUNTS 2019/20

Conor Byrne, HF&P, introduced the report, explaining that the Statement of Accounts 2019/20 was delayed due to issues identified by Deloitte in relation to the audit of the Berkshire Pension Fund. He added that EY had issued an unqualified opinion on the financial statements, concluding that there were no matters to report on, including the Authority's arrangements to secure economy, efficiency and effectiveness in its use of resources.

Andrew Brittain, Ernst and Young presented the Audit Results Report, confirming that the delay was caused by issues with the Berkshire Pension Fund. The follow up work on pensions is now completed, which concludes the Audit and an unqualified opinion has been given. The only changes in this report to the last presented at Audit and Governance, is the pensions follow up work on pages 64-66.

The Vice-Chairman highlighted page 71 of the agenda pack, stating that EY are satisfied that in all significant respects, Royal Berkshire Fire Authority put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources for the year ended 31 March 2020. He said it is a great news story and congratulated those involved for their hard work.

Councillor Dudley stated that he was pleased to see the Statement of Accounts being signed off, after the delay. He said that the clean bill of health will give the people of Berkshire confidence that Royal Berkshire Fire and Rescue Service is run efficiently and well.

Allison Kennett explained that EY had been playing catch up, but now have resources in place and would be in a position to start the 2020/21 audit in a few weeks' time. She also said that the Audit could be completed quickly and efficiently and 90% of the work could be completed this side of Christmas, in order to catch up.

The Vice-Chairman moved the recommendation and it was seconded by Councillor Benneyworth.

RESOLVED that:

- The Audit Results Report is noted
- The 2019/20 Statement of Accounts is approved.

Dan Harris, Andrew Brittain and Allison Kennett left the meeting.

25. APPOINTMENT OF EXTERNAL AUDITOR

Conor Byrne, HF&P introduced the report, explaining that Public Sector Audit

Appointments (PSAA) had issued a formal invitation to the Authority to opt into its national scheme for appointing external auditors. The PSAA's first appointing period ran for five years from 1 April 2018. PSAA's aim for its next procurement exercise is to encourage market sustainability. This will mean firms can bid for contracts of varying sizes and will be required to meet quality standards and realistic market prices. Given current market conditions, opting into the scheme provides the best chances to solve current external audit issues.

The Vice-Chairman moved the recommendation and it was seconded by Councillor Benneyworth.

RESOLVED that the Committee:

- Agree the Authority should opt into the national scheme for appointing local auditors.
- Recommends this course of action to the Fire Authority.

26. PLANNING ASSUMPTIONS PRESENTATION

Conor Byrne, HF&P, gave a presentation on Planning Assumptions for the Budget 2022/23. He highlighted the increasing risks around funding and set out the major cost pressures on the Revenue Budget. He said that the assumptions underpinning the Medium Term Financial Plan were funding assumptions, expenditure assumptions and reserves position.

Funding assumptions are; settlement funding assessment, council tax yield and collection fund position. Expenditure assumptions are; pay, pensions, supplies and capital financing costs.

He highlighted funding year on year, 2020/21 Government Grants were £5.7m, Business Rates were 5.7m, Council Tax was 23.8m, totalling to £35.2m in funding. 2021/22, Government Grants were £8.4m, Business Rates were £3.3m, Council Tax was £24.2m, totalling to £35.9m in funding.

The settlement funding assessment compromises baseline business rates income and government grants and will be announced following the spending review. The increase between 2020/21 and 2021/22 was 0.17%.

The Council Tax assumption would be a precept increase for 2022/23. Assuming an increase of 1.99% based on last year's referendum principles, would generate £485k. A Tax Base growth of 1% would generate £242k. The Collection Fund assumption is that part of the 2021/22 deficit (£264k) spread over three years will amount to £76k rolling forward to 2022/23. It is assumed that there will be no new collection fund deficits for 2022/23. The assumption for the Business Rates Collection Fund is that there is potential for significant volatility as the Covid-19 effects of Covid-19 unwind.

Pay Awards for 2021/22 were unbudgeted and will need to be built into the base for 2022/23. Each 1% increase in pay costs £280k. In addition to pay awards,

£143k needs to be built in for increments. There's an increasing pressure on supplies and services over the last couple of years. Contract Inflation of 3% (£231K) has been built in for 2022/23.

There has been an increase in the average employer contribution rates for fire fighter pension schemes from 17.6% to 30.2% from April 2019. Any changes to contribution rates from the 2020 valuation will be applicable from April 2024.

The assumption for the Revenue Budget for 2022/23 is that there will be a shortfall of £1,072,000. This will mean reviewing all areas of activity to prioritise resources for the delivery of key objectives, developing a range of costed savings and ranking savings to match the final funding settlement to balance the budget.

Councillor Dudley stated that the graph of reserves demonstrates the level of reserves held by some Fire Authority's across the country and this is something that Local Government highlight when we request additional funding. He also said that he always highlights to HMIFRS that Royal Berkshire Fire and Rescue Service always provide incredible value and continue to provide a performance that you would expect from a higher quartile Authority. We continue to lobby Government and MPs for flexibility in funding and a 'Fiver for Fire'. An additional £5 per year per household would still provide great value for money and would still leave us in the bottom half of precepting authorities. He said that there had been discussions with local MPs and that the CFO and HF&P were putting together a presentation to demonstrate the work we currently do.

Please contact committeeteam@rbfrs.co.uk if you would like a copy of the presentation.

The Vice-Chairman moved the recommendation and it was seconded by Councillor Stanford-Beale.

RESOLVED that the report be noted.

27. PENSIONS UPDATE

Becci Jefferies, Head of HR and Learning and Development (HHRL&D), gave a verbal update on pensions. She stated that following the Fire Authority's determination in February 2021, six of the 30 'Immediate Detriment' cases had been processed with another two currently in progress. In all but one of these case, benefits have been able to be manually calculated.

On 19 July 2021, HM Treasury introduced the Public Service Pensions and Judicial Offices Bill setting out in law HMT's solution to age discrimination found in the public sector pension schemes. Whilst this Bill will provide some clarity it will not provide guidance on how to complete the work.

The LGA and FBU have worked to agree a Memorandum of Understanding, framework and a timetable for providing remedy to each affected pension

scheme member. The Framework identifies two categories of members, Cat 1 – active members and those staff already being processed under the FA's extant decision and Cat 2 – pensioners. The framework is required to be adopted by the Authority as part of the governance arrangements and a paper will be drafted and brought for consideration as soon as able to do so.

West Yorkshire Pension Fund (WYPF), the Pension Administrator are working to identify affected individuals and the HR department will undertake the same to match records in preparation. Initial estimate are that there are 12 category 2 members at RBFRS.

WYPF currently work with a number of FRA and if all Services adopt the framework around the same time, WYPF could receive a high number of requests all at once which require processing in line with prescribed timelines. This could affect business as usual activity. This work will add additional pressures to FRA payroll and administration, with interest payments also needing to be met by FRS'.

There is currently no further information on the O'Brien case, but the options exercise could arise at the same as the Sargent remedies.

There are currently two public consultations on the cost control mechanism in public service pensions schemes and secondly on the appropriate methodology for setting the discount rate. The Fire Authority, via Conor have responded to.

We will continue to work closely with the FBU and individuals to resolve problems arising in relation to pensions matters.

Councillor Chadwick asked whether there was ball park figure on the cost of the work. Becci stated that it is very difficult to estimate. The framework provides an indication of the additional payments to be made to individuals and how calculated but there will also be additional tax costs arising from remedying cases and costs associated with the administration of processing cases. It is not clear if authorities will receive support to meet the costs.

**28. QUARTERLY PERFORMANCE REPORT (JANUARY - MARCH 2021)
- QUARTER FOUR**

Becca Chapman, Data, Performance and Risk Manager (DP&RM), provided a summary of the Quarter Four Performance report. She highlighted that the number of Safe and Well Visits and Fire Safety Audits exceeded their target for the quarter, there was continued achievement of the response standard, low levels of staff sickness and progress on our priority programmes, with phase 1 of the Built Environment Programme being completed.

Councillor Chadwick asked why there was more staff in development than training on page 34, quadrant four of the report. Becci Jefferies explained that development is the assessment pathway for firefighters, which takes 18 months to demonstrate competency within the role.

Councillor Linden highlighted the exceptional performance from the quarter. He said that despite the ongoing impact of Covid-19, our teams have exceeded expectations in the number of Safe and Well Visits and Fire Safety Audits completed, the Service has continued to meet its Response Standard, responding within 10 minutes on 76.1% of occasions, working time lost to staff sickness remains below the target of 4% and there is progress being made on our Priority Programmes. Councillor Linden added that he was particularly pleased to note the completion of phase one of the High Rise Building Project. He said that he wanted to extend his thanks to all those that contributed to the fantastic achievements.

Councillor Dudley concurred with the Vice-Chairman's congratulations. He highlighted the number of Safe and Well Visits exceeding expectation, stating that staff continue to show incredible bravery going into homes and this needs to be commended. He also said that maintaining our Response Standard during this time was fantastic. He said he wanted to remind residents of Royal Berkshire that we are one of the few Fire and Rescue Services that measure all response in the same way.

The Vice-Chairman moved the recommendation and it was seconded by Councillor Dudley.

RESOLVED that:

- The performance against Service Provision and Corporate Health measures for the targets agreed by the Fire Authority for 2020/21 be noted;
- The progress made on the two priority programmes be noted; and
- The position of corporate risk be noted.

29. DATE OF NEXT MEETING

Monday, 24 January 2021, at 6.30pm, Lynda Kenyon Suite, Royal Berkshire Fire and Rescue Service (RBFRS) Headquarters, Newsham Court, Pincents Kiln, Calcot, Reading, Berkshire RG31 7SD.

(The meeting concluded at 19:46)

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ROYAL BERKSHIRE FIRE AUTHORITY



| | |
|---------------------------|---|
| COMMITTEE | AUDIT & GOVERNANCE COMMITTEE |
| DATE OF MEETING | 24 JANUARY 2022 |
| SUBJECT | INTERNAL AUDIT UPDATE |
| LEAD OFFICER | CONOR BYRNE, HEAD OF FINANCE AND PROCUREMENT |
| LEAD MEMBER | N/A |
| EXEMPT INFORMATION | NONE |
| ACTION | FOR NOTE |

1. **EXECUTIVE SUMMARY**

- 1.1 The Committee will receive an update on audits completed since the last Committee meeting.

2. **RECOMMENDATION**

The Committee is requested to:

- 2.1 **NOTE** the findings as presented in RSM's Progress Report.

3. **REPORT**

- 3.1 RSM's Progress Report is attached as **Appendix A** and shows that one audit has been completed and finalised since the last Committee meeting, which was a review of vetting and pre-employment checks.
- 3.2 Overall, the review found that there were effective controls and arrangements in place to ensure the completion of vetting and pre-employment checks when hiring staff.
- 3.3 RSM issued one medium priority recommendation and two low priority recommendations. The medium priority recommendation concerned qualification checks. In future, scanned and signed copies of qualifications reviewed by managers will be retained within personnel files as evidence staff members have met role requirements.
- 3.4 RSM issued its second highest assurance opinion in relation to this audit stating that, "taking account of the issues identified, the Service can take

Agenda Item 5

reasonable assurance that the controls upon which the organisation relies to manage this risk are suitably designed, consistently applied and effective. However, we have identified issues that need to be addressed in order to ensure that the control framework is effective in managing the identified risk(s).”

- 3.5 A representative from RSM will attend the meeting to update Members.

4. CONTRIBUTION TO STRATEGIC COMMITMENTS

- 4.1 Commitment 5 – We will ensure that Royal Berkshire Fire and Rescue Service provides good value for money.

5. FINANCIAL IMPLICATIONS

- 5.1 The work of the internal auditors assures Members that the Authority’s finances are in good order.

6. LEGAL IMPLICATIONS

- 6.1 In accordance with Public Sector Internal Audit Standards, the Head of Internal Audit is required to provide an annual opinion, based upon and limited to the work performed, on the overall adequacy and effectiveness of the organisation’s risk management, control and governance processes. The opinion should contribute to the Authority’s Annual Governance Statement.

7. EQUALITY AND DIVERSITY IMPLICATIONS

- 7.1 None.

8. RISK IMPLICATIONS

- 8.1 The internal audit programme aims to identify key risks and report on the effectiveness of controls and mitigating actions.

9. CONSISTENCY WITH DUTY TO COLLABORATE

- 9.1 Internal audits will consider how the Authority is meeting this requirement where applicable.

10. PRINCIPAL CONSULTATION

- 10.1 No issues for statutory officers.

11. BACKGROUND PAPERS

- 11.1 2021/22 Internal Audit Plan.

12. APPENDICES

12.1 Appendix A - 2021/22 Progress Report

13. CONTACT DETAILS

13.1 Conor Byrne - Head of Finance and Procurement
Email: byrnec@rbfrs.co.uk
Tel: 07585 991602

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ROYAL BERKSHIRE FIRE AND RESCUE SERVICE

Internal Audit Progress Report

For the Audit and Governance Committee on 24 January 2022

This report is solely for the use of the persons to whom it is addressed.
To the fullest extent permitted by law, RSM UK Risk Assurance Services LLP
will accept no responsibility or liability in respect of this report to any other party.

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Agenda Item 5
Appendix A

Introduction

The internal audit plan for 2021/22 was approved by the Audit & Governance Committee at the 31st March 2021 meeting. This report provides an update on progress against that plan and summarises the results of our work to date.

As the developments around Covid-19 will continue to impact on all areas of the organisation’s risk profile, we will continue to work closely with management to deliver an internal audit programme which remains flexible and ‘agile’ to ensure it meets your needs in the current circumstances.

Reports

1.1 Summary of final reports being presented to this committee

We have finalised one report since the last meeting and this section summarises this report. Three further audits are in progress and will be reported to the next meeting.

Page 21

| Assignment | Opinion issued | | | Actions agreed | | |
|------------|----------------|---|---|----------------|---|---|
| | L | M | H | L | M | H |

Vetting and Pre Employment Checks 2.21/22

Overall, our review found that there were effective controls and arrangements in place to ensure the completion of vetting and pre-employment checks when hiring staff. We identified that policy documents and other guidance materials had been prepared to define the key responsibilities and outline the expected processes relating to employment checks. Sample testing confirmed job advertisements/profiles and conditional offers outlined the information required from candidates and checks to be completed, whilst we further confirmed checks had been undertaken prior to start dates. We found suitable training was provided to recruitment managers and HR staff, whilst also confirming access to personnel files was appropriately restricted.

We have, however, noted areas for improvement, namely in relation to the retaining of evidence to confirm qualifications have been checked and recording of DBS checks not requiring renewal. There was also no evidence within personnel files of qualifications being reviewed as part of the recruitment process for a sample of new starters.



Appendix A
Agenda Item 5

Assignment

Opinion issued

Actions agreed

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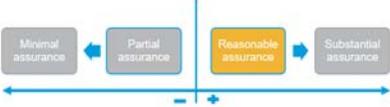
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1.2 Themes arising from control observations

| Theme* | Low | Medium | High |
|---|-----------|----------|----------|
| Planning | 0 | 0 | 0 |
| Policies and / or procedures | 0 | 0 | 0 |
| Non-compliance with policies / procedures | 0 | 0 | 0 |
| Design of the control framework | 0 | 0 | 0 |
| Training / awareness for staff | 0 | 0 | 0 |
| Management or performance information | 1 | 1 | 0 |
| Terms Of Reference | 3 | 0 | 0 |
| Lack of segregation of duties | 0 | 0 | 0 |
| Security | 0 | 0 | 0 |
| Governance weaknesses | 7 | 1 | 0 |
| Information technology | 0 | 0 | 0 |
| Sucession Planning | 0 | 0 | 0 |
| Total | 11 | 2 | 0 |

* The themes arising above relate to the finalised 2021/22 reports only

Appendix A – Progress against the internal audit plan 2021/2022

| Assignment and Executive Lead | Status / Opinion issued | Actions agreed | | | Actual Audit & Governance Committee |
|---|--|----------------|---|---|-------------------------------------|
| | | L | M | H | |
| Performance Management 1.21/22 | | | | | |
| Doug Buchanan – Director of Service Delivery |  | 9 | 1 | 0 | October 2021 |
| Vetting and Employment Checks | | | | | |
| Becci Jefferies – Head of HR & Learning and Development |  | 2 | 1 | 0 | January 2022 |
| Firefighter Pension Administration | | | | | |
| Becci Jefferies – Head of HR & Learning and Development | In QA | | | | |
| Payroll Provider – Dataplan | | | | | |
| Becci Jefferies – Head of HR & Learning and Development | In Progress | | | | |
| Value for Money | | | | | |
| Conor Byrne – Head of Finance and Procurement Services | In Progress | | | | |

| Assignment and Executive Lead | Status / Opinion issued | Actions agreed | | | Actual Audit & Governance Committee |
|---|---|----------------|-----------|----------|-------------------------------------|
| | | L | M | H | |
| Key Financial Controls | | | | | |
| Conor Byrne – Head of Finance and Procurement Services | Commencing 8 th February 2022 | | | | |
| Cyber Essentials | | | | | |
| Tony Vincent – Head of Business Information and Systems | Commencing 21 st February 2022 | | | | |
| Risk Management and Governance | | | | | |
| Katie Mills – Interim Director of Corporate Services | Commencing 17 th March 2022 | | | | |
| | | Total | 11 | 2 | 0 |

Appendix B – Other matters

Changes to the audit plan

| Note | Auditable area | Reason for change |
|------|----------------|-------------------|
| | None to report | |

Annual Opinion 2021/22

The Audit and Governance Committee should note that the assurances given in our audit assignments are included within our Annual Assurance report. The Committee should note that any negative assurance opinions will need to be noted in the annual report and may result in a qualified or negative annual opinion. We have not issued any negative opinions to date in 2021/22.

Information and briefings

There has been one Emergency Services client briefing issued since the last Committee meeting in October 2021, copies have been provided to Officers and can be provided to Members on request:

- Emergency Services New Briefing – November 2021

Quality assurance and continual improvement

To ensure that RSM remains compliant with the IIA standards and the financial services recommendations for Internal Audit we have a dedicated internal Quality Assurance Team who undertake a programme of reviews to ensure the quality of our audit assignments. This is applicable to all Heads of Internal Audit, where a sample of their clients will be reviewed. Any findings from these reviews being used to inform the training needs of our audit teams. The Quality Assurance Team is made up of; the Head of the Quality Assurance Department (FCA qualified) and an Associate Director (FCCA qualified), with support from other team members across the department. This is in addition to any feedback we receive from our post assignment surveys, client feedback, appraisal processes and training needs assessments.

Post assignment surveys

We are committed to delivering an excellent client experience every time we work with you. Your feedback helps us to improve the quality of the service we deliver to you. Currently, following the completion of each product we deliver we attached a brief survey for the client lead to complete. We would like to give you the opportunity to consider how frequently you receive these feedback requests; and whether the current format works. Options available are 1) After each review (current option), 2) Monthly / quarterly / annual feedback request or 3) Executive lead only, or executive lead and key team members.

For more information contact

Daniel Harris, Head of Internal Audit

Daniel.Harris@rsmuk.com

01908 687800

Amir Kapasi, Client Manager

Amir.Kapasi@rsmuk.com

01908 687800

rsmuk.com

The matters raised in this report are only those which came to our attention during the course of our review and are not necessarily a comprehensive statement of all the weaknesses that exist or all improvements that might be made. Actions for improvements should be assessed by you for their full impact. This report, or our work, should not be taken as a substitute for management's responsibilities for the application of sound commercial practices. We emphasise that the responsibility for a sound system of internal controls rests with management and our work should not be relied upon to identify all strengths and weaknesses that may exist. Neither should our work be relied upon to identify all circumstances of fraud and irregularity should there be any.

Our report is prepared solely for the confidential use of Royal Berkshire Fire & Rescue Service and solely for the purposes set out herein. This report should not therefore be regarded as suitable to be used or relied on by any other party wishing to acquire any rights from RSM UK Risk Assurance Services LLP for any purpose or in any context. Any third party which obtains access to this report or a copy and chooses to rely on it (or any part of it) will do so at its own risk. To the fullest extent permitted by law, RSM UK Risk Assurance Services LLP will accept no responsibility or liability in respect of this report to any other party and shall not be liable for any loss, damage or expense of whatsoever nature which is caused by any person's reliance on representations in this report.

This report is released to you on the basis that it shall not be copied, referred to or disclosed, in whole or in part (save as otherwise permitted by agreed written terms), without our prior written consent.

EXECUTIVE SUMMARY – VETTING AND PRE – EMPLOYMENT CHECKS

Why we completed this audit

We undertook a review of Vetting and Pre-Employment Checks as part of the agreed internal audit plan for 2021/22 at Royal Berkshire Fire and Rescue Service (RBFRS). The objective of this review was to allow the Service to take assurance over the effectiveness of controls in place with regards to vetting and pre-employment checks. Vetting and pre-employment checks act to confirm that successful candidates have the right skills, knowledge, behaviours and experience for job roles.

Recruiting managers prepare job profiles and advertisements, which include job descriptions and person specifications. These outline specific job requirements, such as information to be provided by candidates and checks to be completed. Right to work (RTW) checks are undertaken at the interview stage, with scanned and signed evidence of these retained in personnel files. Conditional offers of employment are then issued to successful candidates, further outlining any information required and remaining checks to be completed. Depending on job roles, checks may be undertaken to confirm employment history, references, qualifications and medical/fitness.

In addition, the Service uses basic and enhanced Disclosure and Barring Service (DBS) checks. Basic checks act as entry checks for specified roles, whilst enhanced checks are required for staff and volunteers involved in prevention and community safety activities. Enhanced DBS checks are renewed annually or three years, depending on the purpose of these.

All vetting and pre-employment checks should be completed prior to expected start dates. Where this is not achieved, action is taken by the Service, such as deferring start dates or placing staff on restricted duties. Evidence of vetting and pre-employment checks are accounted for on the checklists in personal record files, and on FireWatch, the Service's HR system.

Conclusion

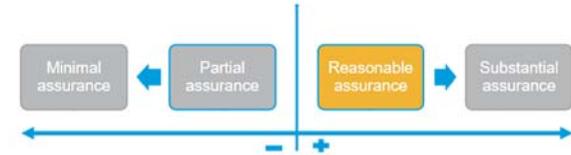
Overall, our review found that there were effective controls and arrangements in place to ensure the completion of vetting and pre-employment checks when hiring staff. We identified that policy documents and other guidance materials had been prepared to define the key responsibilities and outline the expected processes relating to employment checks. Sample testing confirmed job advertisements/profiles and conditional offers outlined the information required from candidates and checks to be completed, whilst we further confirmed checks had been undertaken prior to start dates. We found suitable training was provided to recruitment managers and HR staff, whilst also confirming access to personnel files was appropriately restricted.

We have, however, noted areas for improvement, namely in relation to the retaining of evidence to confirm qualifications have been checked and recording of DBS checks not requiring renewal. There was also no evidence within personnel files of qualifications being reviewed as part of the recruitment process for a sample of new starters. We also found there was no communication of whether volunteers requiring DBS checks were active or on a break from such activities. Further details can be found within section two of this report.

Internal audit opinion:

Taking account of the issues identified, the Service can take reasonable assurance that the controls upon which the organisation relies to manage this risk are suitably designed, consistently applied and effective.

However, we have identified issues that need to be addressed in order to ensure that the control framework is effective in managing the identified risk(s).



Key findings

We identified the following weaknesses, resulting in one medium priority management action being agreed:

Completion of Checks



Vetting and pre-employment checks are specific to job roles, and may include references, qualifications, and DBS checks. For a sample of 20 staff members hired in the past 12 months (covering a range of roles), we reviewed personnel files and FireWatch, noting that although scanned copies were retained as evidence for most checks, this had not been done for the qualifications of six of the sample. The interview checklist states that managers should sign, and date copies of any documents provided by candidates, including qualification certificates. It was further clarified that certain qualifications (such as GCSE and A Levels) do not need to be retained. Where copies of qualification checks are not retained (where relevant), there is no evidence these have been completed.

There is a risk the Service cannot be assured staff are suitably qualified for roles. **(Medium)**

We noted the following controls to be adequately designed and operating effectively:

Policy Documents



There are two recruitment policy documents linked to vetting and pre-employment checks, both of which are available to staff via the intranet. Through review of the Recruitment and Induction Policy, we found the contents outlined responsibilities and expectations including stating job requirements in job profiles and adverts, completing right to work checks and the retention of checking evidence. This policy was in the process of being updated at the time of our review. The DBS and Recruitment of Ex-Offenders Policy was noted to focus on DBS checks, namely the types of checks and roles where these are required. This policy was last reviewed and shared with staff in May 2021.

Procedural Guidance

Guidance on the Service's recruitment processes, including vetting and pre-employment checks, is found on the HR pages of the staff intranet. Through review, we found that guidance focussed on the recruitment stages, including job profiles, advertisements, selection criteria and right to work checks. At the time of our review, the HR team was in the process of compiling all recruitment guidance into one document. We obtained the draft Managers Recruitment Guide, noting that this expanded upon the recruitment (and vetting/pre-employment check) guidance detailed within the policies and on the intranet.

Recruitment Training

The Service provides 'Recruitment and Selection' and 'Safer Recruitment and DBS' training sessions for staff, namely HR staff and recruiting managers. We confirmed that training materials covered legal frameworks for DBS checks, defining information required/checks to be completed in job advertisements and completing pre-employment checks. We obtained a report detailing all members of the HR team, as well as those managers involved in recruitment. We confirmed for a sample of HR staff that training had either been attended or was arranged prior to the end of 2021, with all members of the HR team also Chartered Institute of Personnel and Development (CIPD) qualified. For a sample of recruiting managers, we confirmed through review of training records that each had attended a recruitment-focussed training session.

Job Advertisements and Profiles

Job adverts are prepared by Recruiting Managers and are consistent with job profiles. These include specific role requirements, such as qualifications and DBS checks. For our sample of 20 new starters, we confirmed that job requirements and checks were clearly outlined within the job adverts/profiles, with requirements and checks dependent on job role. We found that there was evidence of review and approval of the profiles and advertisements (and therefore the stated requirements/checks) by appropriate managers, in line with the Recruitment and Induction Policy.

Conditional Offers of Employment

Conditional offers are issued to successful candidates after the completion of right to work checks. These offers state the information required (such as references) and checks to be completed (such as DBS checks) prior to start dates. We confirmed there was evidence right to work checks had been completed for our sample of 20 new starters, whilst review of conditional offers found these clearly outlined the information to be provided, checks to be completed and deadlines for this. We also noted that offers detailed how start dates would be deferred should information not be received and checks not be completed in a timely manner.

Timeliness of Checks



Where vetting and pre-employment checks are not completed prior to expected start dates, the Service must then take appropriate, temporary action. This may include postponing start dates or placing starters on restricted duties. For our sample of 20 new starters, we confirmed that conditional offers clearly outlined that failure to provide information required to complete checks in a timely manner would result in deferred start dates. We found that all checks had been completed for our sample prior to start dates, as per the evidence retained in personnel files, and so deferrals were not required.

Access to Personnel Files



The Service uses physical personnel files to retain evidence of vetting and pre-employment checks, with electronic files also used during remote working arrangements following the COVID-19 outbreak. We confirmed when onsite that physical files are located within a lockable cupboard, with access restricted by keycode. We also confirmed through review of a permissions report that all staff with access to electronic files were current members of the HR team and as such access was appropriate.

A further two low priority management actions have been agreed, included in the detailed findings and actions section of this report.

2. DETAILED FINDINGS AND ACTIONS

This report has been prepared by exception. Therefore, we have included in this section, only those areas of weakness in control or examples of lapses in control identified from our testing and not the outcome of all internal audit testing undertaken.

| Area: Evidence of Qualification Checks | |
|--|---|
| Control | <p>HR are responsible for ensuring vetting and pre-employment checks are completed. These include:</p> <ul style="list-style-type: none"> • Identification and right to work checks; • Qualifications where required for role; • Employment history and references; • Basic and enhanced DBS checks; and • Medical and fitness checks. <p>HR uses an appointment checklist to confirm all required documentation has been received and reviewed for candidates, as well as that all checks have been completed.</p> <p>Checklists are signed off by HR when fully completed and retained in personnel files.</p> |
| | <p>Assessment:</p> <p>Design ✓</p> <p>Compliance ×</p> |
| Findings / Implications | <p>We obtained a report of all staff members hired within the past 12 months and selected a sample of 20, with job roles ranging from Firefighter to Accounts Officer.</p> <p>Through review of personnel files and FireWatch accounts, we confirmed there was evidence of relevant information being provided by staff and vetting/pre-employment checks being completed for 14 of our sample. This included evidence of references, right to work and DBS checks.</p> <p>For the remaining six new starters, whilst evidence was held for all other checks, there was no evidence that qualifications had been reviewed and confirmed as appropriate. Qualifications required were documented within job roles and job specifications and included minimum GCSE results, minimum A Level results, degree level education and specific degrees/professional certificates.</p> <p>Through discussion with the HR Advisor (Team Leader), we were informed that qualifications were checked by managers at the interview stage, however it was unclear why scanned copies had not been taken (although certain qualifications such as GCSEs and A levels are not required to be retained).</p> <p>Through review of the personnel files for the sample of 20, we identified that these included two checklists:</p> <ul style="list-style-type: none"> • An interview checklist, completed by interviewing managers to ensure key tasks have been fulfilled; and • A file maintenance checklist, completed by the HR team to confirm the contents of personnel files. <p>We noted that the interview checklist stated that managers should sign and date copies of qualification certificates, however this did not specify which type of qualifications where to be retained and this was not included as a requirement (check) within the file maintenance checklist. The latter checklist checked that the former was marked as completed but did not confirm the completion of tasks.</p> |

Area: Evidence of Qualification Checks

Where scanned copies of qualifications are not retained in personnel files, there is a risk that the Service cannot be assured that recruited staff have the qualifications required for job roles, which may impact delivery and performance. In addition, the Service may not be able to demonstrate compliance with policy.

| | | | | |
|----------------------------|--|---|------------------------------------|----------------------------|
| Management Action 1 | Scanned and signed copies of qualifications reviewed by managers will be retained (where necessary) within personnel files as evidence staff members have met role requirements. | Responsible Owner: Emma Scott | Date: 31st December 2021 | Priority: Medium |
| Management Action 2 | The file maintenance checklist will be updated to include a check of scanned and signed qualification certificates. HR staff will then retrospectively check to ensure certificates are included in personnel files when completing the checklist. | Responsible Owner: Emma Scott | Date: 31st December 2021 | Priority: Low |

Area: DBS Renewals

| | | | |
|--------------------------------|---|--------------------|---|
| Control | <p>Basic online DBS checks are used as entry checks for a number of roles, including operational firefighters and control staff. Given that these are entry checks, there is no requirement to regularly review these.</p> <p>Enhanced DBS checks are required for roles including those individuals involved in prevention/community Safety activities.</p> <p>Enhanced DBS checks are reviewed every three years for Service employees. The previous DBS date is recorded on the FireWatch system, which provides reminders to HR where these are expiring.</p> <p>Enhanced DBS checks are reviewed annually for volunteers. The Volunteer Coordinator is responsible for informing HR where these are expiring.</p> | Assessment: | |
| | | Design | ✓ |
| | | Compliance | × |
| Findings / Implications | <p>We obtained a report of all staff and volunteers requiring enhanced DBS checks either as part of their job roles or additional volunteering activities. We selected a sample of 20, including ten staff members and ten volunteers.</p> <p>Using the DBS check dates, expiry dates and renewal periods (one or three years) as recorded on FireWatch, we identified that ten DBS checks were overdue. These checks had expired by an average of 14 months, with 27 months the maximum period of expiration.</p> <p>We were informed by the HR Advisor (Team Leader) that all volunteering activity had been paused in March 2020 following the COVID-19 outbreak. As a result of this, individuals were not working with children or vulnerable people and DBS checks were not renewed in this period. We identified that DBS checks for five of our sample had expired across August 2020 and June 2021, during the period checks were not being renewed. As such, we have not raised an issue with the expiration of these DBS checks.</p> <p>At the time of our review, volunteering was to recommence in October 2021 and as such expired DBS checks were in the process of being renewed.</p> | | |

Area: DBS Renewals

The remaining five expired DBS checks all related to volunteers (non-staff). We were informed by the Volunteer Co-Ordinator that prior to the pausing of renewals, each of the five had been on breaks from volunteering activity. In order to save the cost of completing a DBS that is not required (where volunteering breaks become permanent), DBS checks are renewed when volunteering activity is to resume (after breaks from volunteering activity).

We were unable to confirm that these five volunteers had been on breaks as this had not been communicated to the HR team to then update FireWatch records.

Where the HR team is not informed of volunteer breaks in a timely manner, FireWatch DBS records are not updated to reflect this. It is therefore unclear whether volunteers are active or on breaks. As such, there is a risk that DBS checks are not renewed in a timely manner where required and volunteers engage in activities that are inappropriate or are unavailable (pending DBS checks).

| | | | | |
|-----------------------------------|--|---|---|---------------------------------|
| <p>Management Action 3</p> | <p>The Volunteer Co-Ordinator will record and communicate to the HR team all volunteers that are on/returning from a break (from volunteering activity).</p> <p>The HR team will update FireWatch accounts as appropriate to reflect this.</p> | <p>Responsible Owner: Emma Scott</p> | <p>Date: 31st December 2021</p> | <p>Priority: Low</p> |
|-----------------------------------|--|---|---|---------------------------------|

Emergency Services News Briefing

November 2021



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In this edition of our news briefing, we draw attention to some of the key developments and publications affecting the sector including a new Protection Fire Standard and ensuring communities feel safe.

Police

Police response to violence against women and girls

Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) has published a report setting out its findings from inspections carried out on how effectively the police respond to violence against women and girls (VAWG) offences. HMICFRS notes that the police had made vast improvements in the response to VAWG over the last decade, including better identification of repeat victims and improved safeguarding measures. But it also found several areas where the police need to improve, with HMICFRS noting 'grave' concerns about the number of VAWG cases closed without charge, and major gaps in the data recorded on VAWG offences.

While HMICFRS has made several recommendations for immediate improvements to police practices, it concluded that the police cannot tackle VAWG alone. It said the whole system, including policing, health and education, must take a fundamentally new approach. HMICFRS also note that the government should consider legislating to create a new statutory duty for all partner agencies to work together to protect women and girls, similar to the existing framework for child protection .

[Read more](#)

Forces given funding boost to increase roll out of Hotspot Policing

The Home Office has announced that 18 police forces will receive a share of £4.12m to increase Hotspot Policing in towns and cities blighted by violent crime. The additional £4.12m will bring the total funding given to those 18 forces to tackle serious violence to £28.6m in 2021. The investment in Hotspot Policing follows the government's Beating Crime Plan to reduce crime, protect victims and make the country safer.

[Read more](#)

Police and local authorities given extra funding for safer streets

The Home Office has announced a £23.5m fund which will be shared amongst police forces and local authorities across England and Wales to make public spaces safer as part of the government's Safer Streets Fund.

[Read more](#)

Questions for committee's consideration

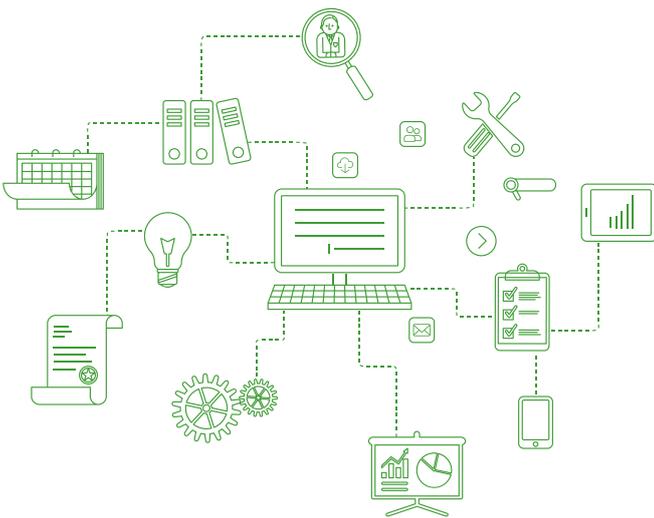
In light of recent high profile national events and the HMICFRS review, how has the Force responded? What action has been taken? What action is planned?

Is the AC aware of the recommendations and do you have assurance on the progress made to date and any gaps in assurance?

Autumn Budget

In delivering his Autumn Budget the Chancellor, Rishi Sunak, announced a fund of £540m to recruit the final 8,000 police officers to reach the government's commitment of recruiting 20,000 new officers by 2023. To ensure swift access to justice for victims, the budget provides almost £650m additional funding by 2024/25 to manage the increased number of offenders being brought to justice by these officers .

[Read more](#)



Questions for committee's consideration

Do you know your Force allocation and if your Force has recruited to the respective target?

Do you have assurance the Force processes in relation to recruitment, onboarding, equipment and training are efficient and effective?

Firearms licensing

The Home Office has published new guidance on firearms licensing which will require any applicant to provide details of their medical history to the police. Applicants for a firearms licence may also be subjected to social media checks and officers will be able to interview their friends or family, or any other relevant individuals .

[Read more](#)

Questions for committee's consideration

Has your Force updated its procedures and how are you getting assurance that Firearms licensing arrangements are robust?



Police and Fire

Cyber and information security

The National Audit Office (NAO) has published a guide to support audit committees to work through the complexity of cyber security. The NAO notes that audit committees should be scrutinising cyber security arrangements. To support this, the NAO's guide complements government advice by setting out high-level questions and issues for audit committees to consider. Audit committees should gain the appropriate assurance for the critical management and control of cyber security and information risk .

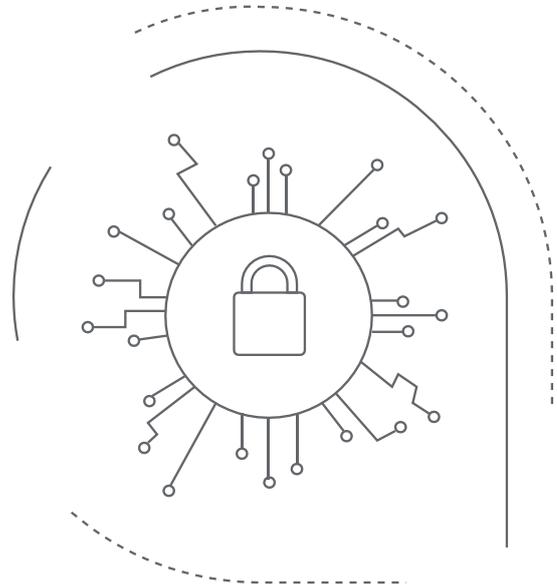
The guide provides a checklist of questions and issues covering:

- the overall approach to cyber security and risk management;
- capability needed to manage cyber security; and
- specific aspects, such as information risk management, engagement and training, asset management, architecture and configuration, vulnerability management, identity and access management, data security, logging and monitoring and incident management.

Questions include:

1. 'Has the organisation implemented a formal regime or structured approach to cyber security which guides its activities and expenditure?';
2. 'How has management decided what level of risk it will tolerate and how it will manage that risk?';
3. 'Does the organisation understand if its risk profile and appetite has changed due to coronavirus?'; and
4. 'Has the organisation identified and deployed the capability it needs in this area?.'

[Read more](#)



Questions for committee's consideration

Has the AC received recent assurance and do they get ongoing assurance in relation to cyber and information security?



ESG (Environmental, Social and Governance)

ESG is poised to be the defining business matter of the decade. With investors, employees, customers and business partners all demanding responsible business activity, organisations cannot ignore how important sustainable and ethical business now is globally.

In a survey conducted by RSM, over 400 middle market business leaders shared how they interact with ESG issues. 56 per cent of businesses are familiar with the concept of ESG. Commissioners, Forces and Fire Authorities need to pay attention to these important pillars of ESG, as being proactive on the social and governance considerations offers great value to organisations. Whilst the survey was aimed at middle market businesses, ESG is becoming an increasingly significant topic across all organisations and businesses whether that is the corporate, public and not for profit sectors.

Read our findings on [The Real Economy hub](#).

RSM’s new Associate Director leading on ESG matters



Paul Callum Associate Director – Risk Advisory
 Paul.callum@rsmuk.com
 M: 07813326064
<https://www.linkedin.com/in/paulcallum>
www.insight4grc.com

Former senior Police officer, Paul is a highly trained detective (with 30 years Policing experience) and critical incident manager with specialist knowledge of complex investigations into organised crime, business human rights and modern slavery, safeguarding and protective security. Paul provided risk management advice to businesses, on a range of subject matters, with a particular focus on the range of societal risks now being experienced by organisations and how responsible business principles can be applied to make for a more sustainable business, no matter what size or sector. Paul’s approach to looks beyond compliance and he is well placed to assist our Police and Fire clients. RSM have recently launched an ESG maturity assessment, and we can provide more details on request.



Fire

Protection Fire Standard

The Fire Standards Board has published the Protection Fire Standard which aims to bring a consistent national approach by fire and rescue services to deliver effective and efficient fire protection activities within their local communities. The desired outcome of the Protection Fire Standard is that it will enable a fire and rescue service to improve the safety of the built environment and wellbeing of its community, complying with its statutory responsibilities. It aims to enable a fire and rescue service to target its resources, using data and intelligence to proactively plan, respond and adapt to the changing needs of its community. Additionally, the Standard aims to evoke a learning and sharing culture among fire and rescue services, to improve and innovate Fire Protection activities and work collaboratively with other regulators, partners and stakeholders.

Alongside the publication of the Protection Fire Standard is the launch of a Fire Standards Implementation Tool. The tool has been designed to support services in assessing how well they meet the Standard and will enable them to build an action plan to resolve areas where there may be gaps.

The Fire Standards Board has also launched a [consultation](#) on the Fire Standard for Fire Investigation. This further Fire Standard will accompany the other eight Fire Standards currently in place. The consultation closes on 6 December 2021 .

[Read more](#)

Questions for committee's consideration

Is the committee assured that the Service is working to implement the requirements of the new standard?

Has your Service / Authority responded to the consultation?

National co-ordination and advisory framework

The revised national coordination and advisory framework (NCAF) for the fire service in England has been reviewed and published. It reflects a number of changes including:

- changes to the National Fire Chiefs Council (NFCC) Chair;
- changes to the Home Office department responsible for Fire Resilience;
- learning from national scale incidents from recent years;
- coronavirus learning; and
- role of the National Strategic Advisory Team (NSAT).

[Read more](#)



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ROYAL BERKSHIRE FIRE AUTHORITY



| | |
|---------------------------|---|
| COMMITTEE | AUDIT & GOVERNANCE COMMITTEE |
| DATE OF MEETING | 24 JANUARY 2022 |
| SUBJECT | EXTERNAL AUDIT UPDATE |
| LEAD OFFICER | CONOR BYRNE, HEAD OF FINANCE AND PROCUREMENT |
| LEAD MEMBER | N/A |
| EXEMPT INFORMATION | N/A |
| ACTION | FOR NOTE |

1. EXECUTIVE SUMMARY

- 1.1 EY will present their Audit Planning Report in relation to the 2020/21 Statement of Accounts.

2. RECOMMENDATION

That the Committee:

- 2.1 **NOTE the contents of the Audit Planning Report in Appendix A**

3. REPORT

- 3.1 The 2019/20 Statement of Accounts were signed off at the last Committee meeting in October which meant that our auditors were able to turn their attention to planning for the audit of the 2020/21 Accounts.
- 3.2 EY's Audit Planning Report is attached as **Appendix A**. This sets out the audit strategy, highlighting potential audit risks and areas of focus. Audit risks vary from year to year based on both internal and external factors.
- 3.3 The audit timetable anticipates that the Statement of Accounts will be ready for sign off at the next Committee meeting in March.
- 3.4 The scale fee for the 2020/21 audit is set out on page 36 of the Audit Planning Report (page 82 in the agenda pack). Members should note that PSAA have still not made a decision in relation to EY's request to increase the scale fee.

4. CONTRIBUTION TO STRATEGIC COMMITMENTS

- 4.1 Commitment 5 – We will ensure that Royal Berkshire Fire and Rescue Service provides good value for money.

5. FINANCIAL IMPLICATIONS

- 5.1 The work of the external auditors assures members that the Authority's finances are in good order.

6. LEGAL IMPLICATIONS

- 6.1 Complies with the Local Audit (Appointing Person) Regulations 2015

7. EQUALITY AND DIVERSITY IMPLICATIONS

- 7.1 None.

8. RISK IMPLICATIONS

- 8.1 Financial risks are identified and mitigations and controls are tested by the external auditors.

9. CONSISTENCY WITH DUTY TO COLLABORATE

- 9.1 The Authority opted into the national procurement exercise run by PSAA to appoint its external auditors.

10. PRINCIPAL CONSULTATION

- 10.1 The Chief Fire Officer has noted the contents of the report.

11. BACKGROUND PAPERS

- 11.1 None.

12. APPENDICES

- 12.1 Appendix A – EY Audit Planning Report

13. CONTACT DETAILS

- 13.1 Conor Byrne - Head of Finance and Procurement
Email: byrnec@rbfrs.co.uk
Tel: 0118 938 4720

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Royal Berkshire Fire Authority

Audit planning report

Year ended 31 March 2021
December 2021



Private and Confidential

December 2021

Audit and Governance Committee
Royal Berkshire Fire Authority
Newsham Court
Pincent's Kiln
Calcot
Reading

Dear Audit and Governance Committee Members

Audit planning report

We are pleased to attach our Audit Plan which sets out how we intend to carry out our responsibilities as auditor. Its purpose is to provide the Audit and Governance Committee with a basis to review our proposed audit approach and scope for the 2020/21 audit in accordance with the requirements of the Local Audit and Accountability Act 2014, the National Audit Office's 2015 Code of Audit Practice, the Statement of Responsibilities issued by Public Sector Audit Appointments (PSAA) Ltd, auditing standards and other professional requirements. It is also to ensure that our audit is aligned with the Committee's service expectations.

This plan summarises our initial assessment of the key risks driving the development of an effective audit for the Authority, and outlines our planned audit strategy in response to those risks. We will update the Audit and Governance Committee if our assessment changes during the course of the audit.

This report is intended solely for the information and use of the Audit and Governance Committee and management, and is not intended to be and should not be used by anyone other than these specified parties.

We welcome the opportunity to discuss this report with you as well as understand whether there are other matters which you consider may influence our audit.

Yours faithfully

Andrew Brittain

For and on behalf of Ernst & Young LLP

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Appendices



Public Sector Audit Appointments Ltd (PSAA) issued the "Statement of responsibilities of auditors and audited bodies". It is available from the PSAA website (<https://www.psa.co.uk/audit-quality/statement-of-responsibilities/>). The Statement of responsibilities serves as the formal terms of engagement between appointed auditors and audited bodies. It summarises where the different responsibilities of auditors and audited bodies begin and end, and what is to be expected of the audited body in certain areas.

The "Terms of Appointment and further guidance (updated April 2018)" issued by the PSAA sets out additional requirements that auditors must comply with, over and above those set out in the National Audit Office Code of Audit Practice (the Code) and in legislation, and covers matters of practice and procedure which are of a recurring nature.

This report is made solely to the Audit and Governance Committee and management of Royal Berkshire Fire Authority in accordance with the statement of responsibilities. Our work has been undertaken so that we might state to the Audit and Governance Committee, and management of Royal Berkshire Fire Authority those matters we are required to state to them in this report and for no other purpose. To the fullest extent permitted by law we do not accept or assume responsibility to anyone other than the Audit and Governance Committee and management of Royal Berkshire Fire Authority for this report or for the opinions we have formed. It should not be provided to any third-party without our prior written consent.



01

Overview of our 2020/21 audit strategy



Overview of our 2020/21 audit strategy

The following 'dashboard' summarises the significant accounting and auditing matters outlined in this report. It seeks to provide the Audit and Governance Committee with an overview of our initial risk identification for the upcoming audit and any changes in risks identified in the current year.

Audit risks and areas of focus

| Risk / area of focus | Risk identified | Change from PY | Details |
|---|------------------|----------------------------|---|
| Misstatements due to fraud or error (Risk of management override) | Fraud risk | No change in risk or focus | As identified in ISA 240, management is in a unique position to perpetrate fraud because of its ability to manipulate accounting records directly or indirectly and prepare fraudulent financial statements by overriding controls that would otherwise appear to be operating effectively. |
| Inappropriate capitalisation of revenue expenditure and inappropriate recording of other income | Fraud risk | Change in risk or focus | Under ISA 240, there is a presumed risk that revenue may be misstated due to improper recognition of revenue. Management is in a unique position to perpetrate fraud through the override of controls. We have considered the main areas where management may have the incentive and opportunity to do this. We have identified the inappropriate capitalisation of revenue expenditure on property, plant and equipment as an area of risk, given the extent of the Authority's capital programme. In addition, for other income, in the comprehensive income and expenditure account, there is a fraud risk of this figure being incorrectly stated. |
| Pension liability valuation | Significant risk | Increase in risk or focus | <p>The Local Authority Accounting Code of Practice and IAS19 require the Authority to make extensive disclosures within its financial statements regarding its membership of the Local Government Pension Scheme administered by Buckinghamshire Council and the Firefighters Pension Scheme.</p> <p>The Authority's pension fund liabilities are material estimated balances and the Code requires that these liabilities be disclosed on the Authority's balance sheet.</p> <p>In recent years there have been a number of issues with the LGPS that have resulted in audit differences in the pension net liability.</p> <p>The information disclosed is based on the IAS 19 reports issued to the Authority by the actuary of the Pension Schemes. Accounting for these schemes involves significant estimation and judgement and due to the nature, volume and size of the transactions, and In light of the revised ISA 540 with respect to accounting estimates (see page 6), we consider this to be a significant risk for 20/21.</p> |

Overview of our 2020/21 audit strategy

Audit risks and areas of focus

| Risk / area of focus | Risk identified | Change from PY | Details |
|--|-----------------|----------------------------|--|
| Valuation of land and buildings | Inherent risk | Decrease in risk | For the 2019/20 audit this was a significant risk due to Covid-19 and the valuers stating there was material uncertainty in their reports. We do not expect the valuers to be expressing material uncertainty in their reports for 2020/21 and our work last year established that Covid-19 did not have a significant impact on the valuation of specialised valued at DRC and no material misstatements were identified from our work on valuation assumptions. However, Property, Plant and Equipment (PPE) represents significant balances in the Authority's accounts and is subject to valuation changes, impairment reviews and depreciation charges. Material judgemental inputs and estimation techniques are required to calculate the year-end PPE balances held in the balance sheet. As the Authority's asset base is significant, and the outputs from the valuer are subject to estimation, there is a higher inherent risk assets may be under/overstated or the associated accounting entries incorrectly posted. |
| Going Concern: Compliance with ISA 570 | Inherent risk | No change in risk or focus | The unpredictability of the current environment gives rise to a risk that the Authority would not appropriately disclose the key factors relating to going concern, underpinned by a management assessment with particular reference to Covid-19 and the Authority's actual year end financial position and performance for the going concern period of 12 months after the auditor's report date. |

Appendix A

Agenda Item 6

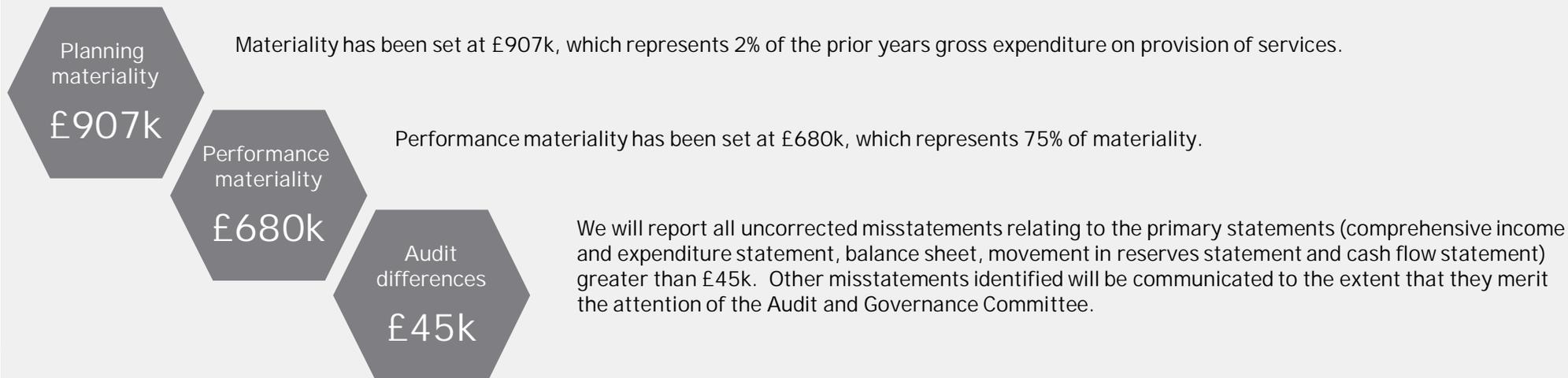
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Auditing accounting estimates

In addition to the above risks and areas of focus, a revised auditing standard has been issued in respect of the audit of accounting estimates. The revised standard requires auditors to consider inherent risks associated with the production of accounting estimates. These could relate, for example, to the complexity of the method applied, subjectivity in the choice of data or assumptions or a high degree of estimation uncertainty. As part of this, auditors now consider risk on a spectrum (from low to high inherent risk) rather than a simplified classification of whether there is a significant risk or not. At the same time, we may see the number of significant risks we report in respect of accounting estimates to increase as a result of the revised guidance in this area. The changes to the standard may affect the nature and extent of information that we may request and will likely increase the level of audit work required.

Overview of our 2020/21 audit strategy

Materiality – Royal Berkshire Fire Authority



Timeline

MHCLG after consultation have agreed that the 30 September for the publication of audited accounts was appropriate and that the removal of the common inspection date, requiring instead that the draft accounts be published no later than 1 August, was also appropriate. The Accounts and Audit (Amendment) Regulations 2021, which will implement these changes, were laid on 9 March and are come into force on 31 March 2021. On 3rd June 2021, we issued a national letter to PSAA audited bodies setting out the principles we will follow to schedule high-quality 2020-2021 audits. In Section 07, we have included a timeline for the audit.

Fees

We include further details on the planned fees for 20/21, and factors affecting the scale fee, in Section 09.

Overview of our 2020/21 audit strategy

Audit scope

This Audit Plan covers the work that we plan to perform to provide you with:

- Our audit opinion on whether the financial statements of Royal Berkshire Fire Authority give a true and fair view of the financial position as at 31 March 2021 and the income and expenditure for the year then ended; and
- Our commentary against specified reporting criteria (see Section 03) on the arrangements the Authority has in place to secure value for money through economic efficient and effective use of its resources for the relevant period.

We will also review and report to the National Audit Office (NAO), to the extent and in the form required by them, on the Authority's Whole of Government Accounts return.

Our audit will also include the mandatory procedures that we are required to perform in accordance with applicable laws and auditing standards.

When planning the audit we take into account several key inputs:

- Strategic, operational and financial risks relevant to the financial statements;
- Developments in financial reporting and auditing standards;
- The quality of systems and processes;
- Changes in the business and regulatory environment; and,
- Management's views on all of the above.

By considering these inputs, our audit is focused on the areas that matter and our feedback is more likely to be relevant to the Authority.

Taking the above into account, and as articulated in this audit plan, our professional responsibilities require us to independently assess the risks associated with providing an audit opinion and undertake appropriate procedures in response to that. Our Terms of Appointment with PSAA allow them to vary the fee dependent on "the auditors assessment of risk and the work needed to meet their professional responsibilities". PSAA are aware that the setting of scale fees has not kept pace with the changing requirements of external audit with increased focus on, for example, the valuations of land and buildings, the valuation of pension obligations, the introduction of new accounting standards such as IFRS 9 and 15 in recent years as well as the expansion of factors impacting the value for money conclusion. In Section 9 we have highlighted where additional work will be required for 2020/21 at this stage. We will discuss with management the associated fees as the audit progresses.

Overview of our 2020/21 audit strategy (cont.)

Value for money conclusion

One of the main changes in the NAO's 2020 Code is in relation to the value for money conclusion. We include details in Section 03 but in summary:

- We are still required to consider whether the Authority has put in place 'proper arrangements' to secure economy, efficiency and effectiveness on its use of resources.
- Planning on VFM and the associated risk assessment is now focused on gathering sufficient evidence to enable us to document our evaluation of the Authority's arrangements, to enable us to draft a commentary under three reporting criteria (see below). This includes identifying and reporting on any significant weaknesses in those arrangements and making appropriate recommendations.
- We will be required to provide a commentary on the Authority's arrangements against three reporting criteria:
 - Financial sustainability - How the Authority plans and manages its resources to ensure it can continue to deliver its services;
 - Governance - How the Authority ensures that it makes informed decisions and properly manages its risks; and
 - Improving economy, efficiency and effectiveness - How the Authority uses information about its costs and performance to improve the way it manages and delivers its services.
- Within the audit opinion we will still only report by exception where we are not satisfied that the Authority has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources.
- The commentary on arrangements will be included in a new Auditor's Annual Report which we will be required to issue at the same time as we issue the audit opinion on the financial statements.



02 Audit risks



Our response to significant risks

We have set out the significant risks (including fraud risks denoted by*) identified for the current year audit along with the rationale and expected audit approach. The risks identified below may change to reflect any significant findings or subsequent issues we identify during the audit.

Misstatements due to fraud or error *

What is the risk?

The financial statements as a whole are not free of material misstatements whether caused by fraud or error.

As identified in ISA (UK) 240, management is in a unique position to perpetrate fraud because of its ability to manipulate accounting records directly or indirectly and prepare fraudulent financial statements by overriding controls that otherwise appear to be operating effectively. We identify and respond to this fraud risk on every audit engagement.

What will we do?

- Identifying fraud risks during the planning stages.
- Inquiry of management about risks of fraud and the controls put in place to address those risks.
- Understanding the oversight given by those charged with governance of management's processes over fraud.
- Consideration of the effectiveness of management's controls designed to address the risk of fraud.
- Determining an appropriate strategy to address those identified risks of fraud.
- Performing mandatory procedures regardless of specifically identified fraud risks, including testing of journal entries and other adjustments in the preparation of the financial statements.

Financial statement impact

Misstatements that occur in relation to the risk of fraud and error could materially affect the income and expenditure accounts. While there are no statutory financial performance targets in local government, management remains under pressure to ensure that the authority balances its annual budgets.

Our response to significant risks

We have set out the significant risks (including fraud risks denoted by*) identified for the current year audit along with the rationale and expected audit approach. The risks identified below may change to reflect any significant findings or subsequent issues we identify during the audit.

Inappropriate capitalisation of revenue expenditure and inappropriate recording of other income *

What is the risk?

Under ISA 240, there is a presumed risk that revenue may be misstated due to improper revenue recognition. In the public sector, this requirement is modified by Practice Note 10 issued by the Financial Reporting Council, which states that auditors should also consider the risk that material misstatements may occur by the manipulation of expenditure recognition.

From our risk assessment, we have assessed that the risk could manifest itself through the inappropriate capitalisation of revenue expenditure to improve the financial position of the general fund.

Capitalised revenue expenditure can be funded through borrowing with only minimal MRP charges recorded in the general fund, deferring the expenditure for 30+ years when the borrowing is repaid.

In addition, we have assessed that there is a risk that other income may be misstated due to improper revenue recognition.

What will we do?

Our approach will focus on:

- For significant additions, we will examine invoices, capital expenditure authorisations, leases and other data that support these additions. We review the sample selected against the definition of capital expenditure in IAS 16.
- We will extend our testing of items capitalised in the year by lowering our testing threshold. We will also review a larger random sample of capital additions below our testing threshold.
- Journal testing - we will use our testing of Journals to identify high risk transactions, such as items originally recorded as revenue expenditure and subsequently capitalised.
- For other income, we will lower our testing threshold to satisfy ourselves that other income stated is materially correct.

Financial statement impact

Inappropriate capitalisation of revenue expenditure would decrease the net expenditure from the general fund, and increase the value of non-current assets.

Our response to significant risks

We have set out the significant risks (including fraud risks denoted by*) identified for the current year audit along with the rationale and expected audit approach. The risks identified below may change to reflect any significant findings or subsequent issues we identify during the audit.

| Pension Liability Valuation | What is the risk? | What will we do? |
|--|--|--|
| <p>Financial statement impact</p> <p>The pension fund deficit is a material and sensitive item. Small changes in assumptions when valuing it can have a material impact on the financial statements. The Code requires the Authority to disclose this net liability on the Council's Balance Sheet.</p> <p>We have reflected on the significance of the liability to the Authority's balance sheet, as well as the difficulty in valuing some of the pension fund assets caused by their nature and size, in the current uncertain economic environment, and classified this as a significant risk.</p> | <p>The Local Authority Accounting Code of Practice and IAS19 require the Authority to make extensive disclosures within its financial statements regarding its membership of the Local Government Pension Scheme administered by Royal Borough of Windsor and Maidenhead Pension Fund.</p> <p>The Authority's pension fund deficit is a material estimated balance and the Code requires that this liability be disclosed on the Authority's balance sheet. At 31 March 2021 this totalled £445 million.</p> <p>The information disclosed is based on the IAS 19 report issued to the Authority by the actuary to Royal County of Berkshire Pension Fund and also the Firefighters Pension Fund.</p> <p>Accounting for this scheme involves significant estimation and judgement and therefore management engages an actuary to undertake the calculations on their behalf. ISAs (UK) 500 and 540 (revised) require us to undertake procedures on the use of management experts and the assumptions underlying fair value estimates.</p> | <p>We will:</p> <ul style="list-style-type: none"> • Liaise with the auditors of Royal County of Berkshire Pension Fund, to obtain assurances over the information supplied to the actuary in relation to Royal Berkshire Fire Authority; • Assess the work of the LGPS pension fund actuary and the Firefighters pension fund actuary (Barnet Waddingham) including the assumptions they have used by relying on the work of PWC - Consulting Actuaries commissioned by the National Audit Office for all Local Government sector auditors, and considering any relevant reviews by the EY actuarial team; • For the Firefighters Pension Fund we audit the benefits payable and contributions receivable based on our testing threshold; and • Review and test the accounting entries and disclosures made within the Authority's financial statements in relation to IAS19. |

Other areas of audit focus

We have identified other areas of the audit, that have not been classified as significant risks, but are still important when considering the risks of material misstatement to the financial statements and disclosures and therefore may be key audit matters we will include in our audit report.

What is the risk/area of focus?

Valuation of Land and Buildings

The fair value of Property, Plant and Equipment (PPE) represent significant balances in the Authority's accounts and are subject to valuation changes, impairment reviews and depreciation charges. Management is required to make material judgemental inputs and apply estimation techniques to calculate the year-end balances recorded in the balance sheet.

What will we do?

We will:

- Consider the work performed by the Authority's valuers, including the adequacy of the scope of the work performed, their professional capabilities and the results of their work;
- Sample testing key asset information used by the valuers in performing their valuation (e.g. floor plans to support valuations based on price per square metre);
- Consider any specific changes to assets that have occurred and that these have been communicated to the valuer;
- Consider changes to useful economic lives as a result of the most recent valuation; and
- Test accounting entries have been correctly processed in the financial statements.

Other areas of audit focus (cont.)

We have identified other areas of the audit, that have not been classified as significant risks, but are still important when considering the risks of material misstatement to the financial statements and disclosures.

What is the risk/area of focus?

Going Concern Compliance with ISA 570

The standard is effective for audits of financial statements for periods commencing on or after 15 December 2019. This auditing standard has been revised in response to enforcement cases and well-publicised corporate failures where the auditor's report failed to highlight concerns about the prospects of entities which collapsed shortly after.

CIPFA's Code of Practice on Local Authority Accounting in the United Kingdom 2020/21 states that an authority's financial statements should be prepared on a going concern basis; the accounts should be prepared on the assumption that the functions of the authority will continue in operational existence for the foreseeable future and can only be discontinued under statutory prescription.

However, ISA 570, as applied by Practice Note 10: Audit of financial statements of public sector bodies in the United Kingdom, still requires auditors to undertake sufficient and appropriate audit procedures to consider whether there is a material uncertainty on going concern that requires reporting by management within the financial statements, and within the auditor's report.

The Authority is then required to ensure that its going concern disclosure within the statement of accounts adequately reflects its going concern assessment and in particular highlights any uncertainties it has identified. We consider the unpredictability of the current environment to give rise to a risk that the Authority will not appropriately disclose the key factors relating to going concern, underpinned by managements assessment with particular reference to Covid-19.

What will we do?

We will:

- Continue to assess the adequacy of disclosures required in 2020/21, and the impact on our opinion, should these be inadequate;
- Obtain management's going concern assessment and review for any evidence of bias and consistency with the accounts;
- Review the financial modelling and forecasts prepared by the Authority. This will consider key assumptions, stress testing applied to those assumptions and consider the risk to cashflow up to at least 12 months after the signing date of the accounts and opinion;
- Ensure that an appropriate going concern disclosure has been made within the financial statements; and
- Consider the impact on our audit report and comply with EY consultation requirements, if such are determined appropriate.

Other areas of audit focus (cont.)

Auditing accounting estimates

ISA 540 (Revised) - Auditing Accounting Estimates and Related Disclosures applies to audits of all accounting estimates in financial statements for periods beginning on or after December 15, 2019.

This revised ISA responds to changes in financial reporting standards and a more complex business environment which together have increased the importance of accounting estimates to the users of financial statements and introduced new challenges for preparers and auditors.

The revised ISA requires auditors to consider inherent risks associated with the production of accounting estimates. These could relate, for example, to the complexity of the method applied, subjectivity in the choice of data or assumptions or a high degree of estimation uncertainty. As part of this, auditors consider risk on a spectrum (from low to high inherent risk) rather than a simplified classification of whether there is a significant risk or not. At the same time, we expect the number of significant risks we report in respect of accounting estimates to increase as a result of the revised guidance in this area.

The changes to the standard may affect the nature and extent of information that we may request and will likely increase the level of audit work required, particularly in cases where an accounting estimate and related disclosures are higher on the spectrum of inherent risk. For example:

We may place more emphasis on obtaining an understanding of the nature and extent of your estimation processes and key aspects of related policies and procedures. We will need to review whether controls over these processes have been adequately designed and implemented in a greater number of cases.

We may provide increased challenge of aspects of how you derive your accounting estimates. For example, as well as undertaking procedures to determine whether there is evidence which supports the judgments made by management, we may also consider whether there is evidence which could contradict them.

We may make more focussed requests for evidence or carry out more targeted procedures relating to components of accounting estimates. This might include the methods or models used, assumptions and data chosen or how disclosures (for instance on the level of uncertainty in an estimate) have been made, depending on our assessment of where the inherent risk lies.

You may wish to consider retaining experts to assist with related work. You may also consider documenting key judgements and decisions in anticipation of auditor requests, to facilitate more efficient and effective discussions with the audit team.

We may ask for new or changed management representations compared to prior years.



03

Value for Money Risks





The Authority's responsibilities for value for money

The Authority is required to maintain an effective system of internal control that supports the achievement of its policies, aims and objectives while safeguarding and securing value for money from the public funds and other resources at its disposal.

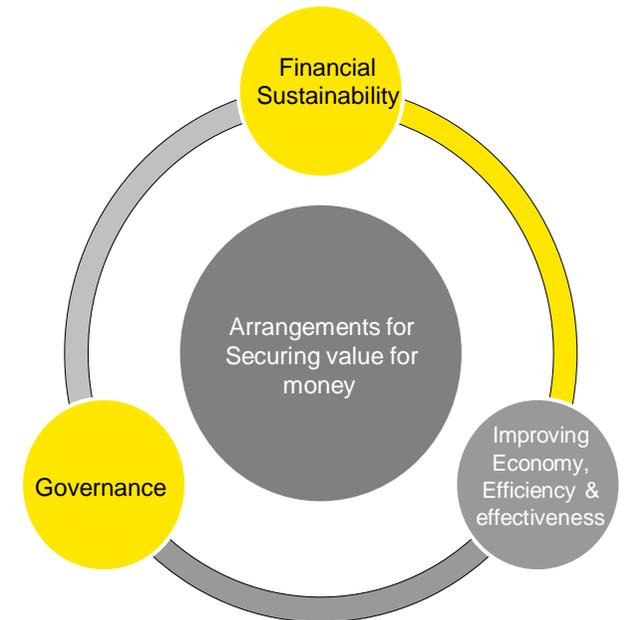
As part of the material published with its financial statements, the Authority is required to bring together commentary on its governance framework and how this has operated during the period in a governance statement. In preparing its governance statement, the Authority tailor's the content to reflect its own individual circumstances, consistent with the requirements of the relevant accounting and reporting framework and having regard to any guidance issued in support of that framework. This includes a requirement to provide commentary on its arrangements for securing value for money from their use of resources.

Auditor responsibilities under the new Code

On 1 April 2020, the NAO's new Code of Audit Practice (the 2020 Code) came into force. This sets out how local auditors are expected to approach and report their work on value for money (VFM) arrangements under the new Code and applies to audits of 2020/21 financial statements onwards. Under the 2020 Code, we are still required to consider whether the Authority has put in place 'proper arrangements' to secure economy, efficiency and effectiveness on its use of resources. However, there is no longer overall evaluation criterion which we need to conclude on. Instead the 2020 Code requires the auditor to design their work to provide them with sufficient assurance to enable them to report to the Authority a commentary against specified reporting criteria (see below) on the arrangements the Authority has in place to secure value for money through economic, efficient and effective use of its resources for the relevant period.

The specified reporting criteria are:

- Financial sustainability
How the Authority plans and manages its resources to ensure it can continue to deliver its services;
- Governance
How the Authority ensures that it makes informed decisions and properly manages its risks; and
- Improving economy, efficiency and effectiveness:
How the Authority uses information about its costs and performance to improve the way it manages and delivers its services.





Planning and identifying VFM risks

The NAO's guidance notes require us to carry out a risk assessment which gathers sufficient evidence to enable us to document our evaluation of the Authority's arrangements, in order to enable us to draft a commentary under the three reporting criteria. This includes identifying and reporting on any significant weaknesses in those arrangements and making appropriate recommendations. This is a change to 2015 Code guidance notes where the NAO required auditors as part of planning, to consider the risk of reaching an incorrect conclusion in relation to the overall criterion.

In considering the Authority's arrangements, we are required to consider:

- The Authority's governance statement
- Evidence that the Authority's arrangements were in place during the reporting period;
- Evidence obtained from our work on the accounts;
- The work of inspectorates and other bodies and
- Any other evidence source that we regard as necessary to facilitate the performance of our statutory duties.

We then consider whether there is evidence to suggest that there are significant weaknesses in arrangements. The NAO's guidance is clear that the assessment of what constitutes a significant weakness and the amount of additional audit work required to adequately respond to the risk of a significant weakness in arrangements is a matter of professional judgement.

However, the NAO states that a weakness may be said to be significant if it:

- Exposes – or could reasonably be expected to expose – the Authority to significant financial loss or risk;
- Leads to – or could reasonably be expected to lead to – significant impact on the quality or effectiveness of service or on the Authority's reputation;
- Leads to – or could reasonably be expected to lead to – unlawful actions; or
- Identifies a failure to take action to address a previously identified significant weakness, such as failure to implement or achieve planned progress on action/improvement plans.

We should also be informed by a consideration of:

- The magnitude of the issue in relation to the size of the Authority;
- Financial consequences in comparison to, for example, levels of income or expenditure, levels of reserves (where applicable), or impact on budgets or cashflow forecasts;
- The impact of the weakness on the Authority's reported performance;
- Whether the issue has been identified by the Authority's own internal arrangements and what corrective action has been taken or planned;
- Whether any legal judgements have been made including judicial review;
- Whether there has been any intervention by a regulator or Secretary of State;
- Whether the weakness could be considered significant when assessed against the nature, visibility or sensitivity of the issue;
- The impact on delivery of services to local taxpayers; and
- The length of time the Authority has had to respond to the issue.



Value for Money

Responding to identified risks

Where our planning work has identified a risk of significant weakness, the NAO's guidance requires us to consider what additional evidence is needed to determine whether there is a significant weakness in arrangements and undertake additional procedures as necessary, including where appropriate, challenge of management's assumptions. We are required to report our planned procedures to the audit committee.

Reporting on VFM

In addition to the commentary on arrangements, where we are not satisfied that the Authority has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources, the 2020 Code has the same requirement as the 2015 Code in that we should refer to this by exception in the audit report on the financial statements.

However, a new requirement under the 2020 Code is for us to include the commentary on arrangements in a new Auditor's Annual Report. The 2020 Code states that the commentary should be clear, readily understandable and highlight any issues we wish to draw to the Authority's attention or the wider public. This should include details of any recommendations arising from the audit and follow-up of recommendations issued previously, along with our view as to whether they have been implemented satisfactorily.

Status of our 2020/21 VFM planning

We have yet to commence our value for money planning. In drafting this plan however, we have taken into consideration the 2019/20 value for money work, our discussions with the finance team and our knowledge of sector-wide issues that may affect the Authority.

We have not identified any significant weaknesses in arrangements to date. We will update the finance team and the Audit and Governance Committee if this assessment changes during the course of the audit.



04

Audit materiality



Materiality

Materiality

For planning purposes, materiality for 2020/21 has been set at £907k. This represents 2% of the Authority's prior year gross expenditure on provision of services and benefit's payable respectively. It will be reassessed throughout the audit process. We have provided supplemental information about audit materiality in Appendix C.

Key definitions

Planning materiality – the amount over which we anticipate misstatements would influence the economic decisions of a user of the financial statements.

Performance materiality – the amount we use to determine the extent of our audit procedures. We have set performance materiality at £680k which represents 75% of materiality. We apply 75% when it is not an initial audit and we have a sound understanding of the entity and past experience with the engagement indicates that a higher risk of misstatement is unlikely.

Audit difference threshold – we propose that misstatements identified below this threshold are deemed clearly trivial. We will report to you all uncorrected misstatements over this amount relating to the income statement and balance sheet that have an effect on income or that relate to other comprehensive income.

Other uncorrected misstatements, such as reclassifications and misstatements in the cashflow statement and movement in reserves statement or disclosures, and corrected misstatements will be communicated to the extent that they merit the attention of the Audit and Governance Committee, or are important from a qualitative perspective.

Specific materiality – We have set a materiality of £1k for remuneration disclosures, related party transactions, members' allowances and exit packages which reflects our understanding that an amount less than our materiality would influence the economic decisions of users of the financial statements in relation to this.



We request that the Audit and Governance Committee confirm its understanding of, and agreement to, these materiality and reporting levels.



05

Scope of our audit



Our Audit Process and Strategy

Objective and Scope of our Audit scoping

Under the Code of Audit Practice our principal objectives are to review and report on the Authority's financial statements and arrangements for securing economy, efficiency and effectiveness in its use of resources to the extent required by the relevant legislation and the requirements of the Code.

We issue an audit report that covers:

1. Financial statement audit

Our objective is to form an opinion on the financial statements under International Standards on Auditing (UK).

We also perform other procedures as required by auditing, ethical and independence standards, the Code and other regulations. We outline below the procedures we will undertake during the course of our audit.

Procedures required by standards

- Addressing the risk of fraud and error;
- Significant disclosures included in the financial statements;
- Entity-wide controls;
- Reading other information contained in the financial statements and reporting whether it is inconsistent with our understanding and the financial statements; and
- Auditor independence.

Procedures required by the Code

- Reviewing, and reporting on as appropriate, other information published with the financial statements, including the Annual Governance Statement; and
- Reviewing and reporting on the Whole of Government Accounts return, in line with the instructions issued by the NAO.

2. Arrangements to secure value for money through economic, efficient and effective use of resources

We are required to consider whether the Authority has put in place arrangements to secure value for money through economic, efficient and effective use of its resources for the relevant period.

Our Audit Process and Strategy (continued)

Audit Process Overview

Our audit involves:

- Identifying and understanding the key processes and internal controls; and
- Substantive tests of detail of transactions and amounts.

For 2020/21 we plan to follow a substantive approach to the audit as we have concluded this is the most efficient way to obtain the level of audit assurance required to conclude that the financial statements are not materially misstated.

Analytics:

We will use our computer-based analytics tools to enable us to capture whole populations of your financial data, in particular journal entries. These tools:

- Help identify specific exceptions and anomalies which can then be subject to more traditional substantive audit tests; and
- Give greater likelihood of identifying errors than random sampling techniques.

We will report the findings from our process and analytics work, including any significant weaknesses or inefficiencies identified and recommendations for improvement, to management and the Audit and Governance Committee.

Internal audit:

As in prior years, we will review internal audit plans and the results of their work. We will reflect the findings from these reports, together with reports from any other work completed in the year, in our detailed audit plan, where they raise issues that could have an impact on the financial statements.

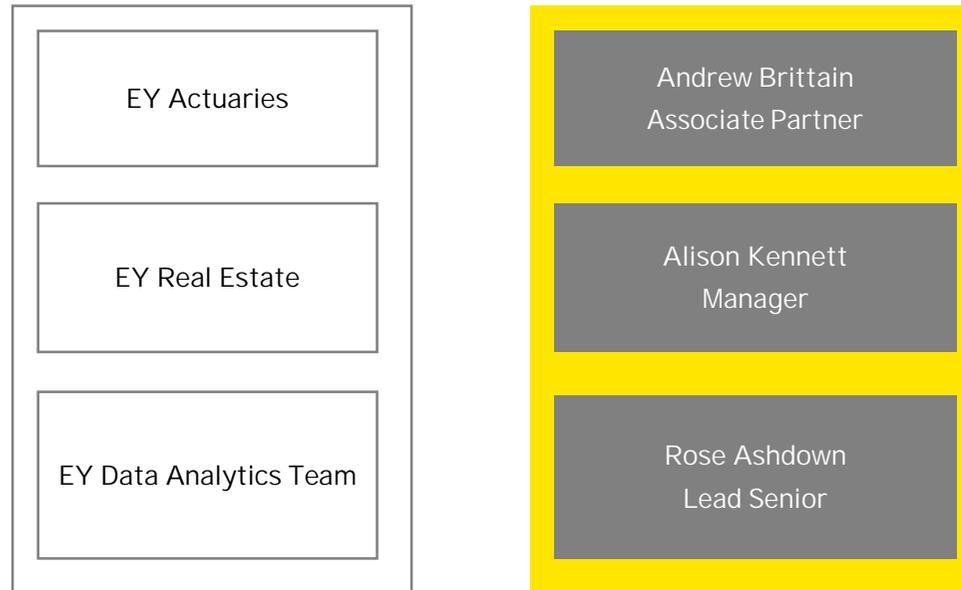


06 Audit team



Audit team

Audit team structure:



Working together with the Authority

We are working together with officers to identify continuing improvements in communication and processes for the 2020/21 audit.

We will continue to keep our audit approach under review to streamline it where possible.

Use of specialists

Our approach to the involvement of specialists, and the use of their work.

When auditing key judgements, we are often required to rely on the input and advice provided by specialists who have qualifications and expertise not possessed by the core audit team. The areas where either EY or third party specialists provide input for the current year audit are:

| Area | Specialists |
|---------------------------------|--|
| Valuation of Land and Buildings | BNP Paribas Real Estate (Royal Berkshire Fire Authority's property valuer), EY Estates (EY specialist) where we believe it is appropriate to do so |
| Pensions disclosure | Barnett Waddingham (Pension Funds Actuary), EY Pensions Advisory and PwC (Consulting Actuary to the National Audit Office) |

In accordance with Auditing Standards, we will evaluate each specialist's professional competence and objectivity, considering their qualifications, experience and available resources, together with the independence of the individuals performing the work.

We also consider the work performed by the specialist in light of our knowledge of the Authority's business and processes and our assessment of audit risk in the particular area. For example, we would typically perform the following procedures:

- Analyse source data and make inquiries as to the procedures used by the specialist to establish whether the source data is relevant and reliable;
- Assess the reasonableness of the assumptions and methods used;
- Consider the appropriateness of the timing of when the specialist carried out the work; and
- Assess whether the substance of the specialist's findings are properly reflected in the financial statements.



07

Audit timeline





Audit timeline

Timetable of communication and deliverables

Timeline

Below is a timetable showing the key stages of the audit and the deliverables we have agreed to provide to you through the audit cycle in 2020/21.

From time to time matters may arise that require immediate communication with the Audit and Governance Committee and we will discuss them with the Audit and Governance Committee Chair as appropriate. We will also provide updates on corporate governance and regulatory matters as necessary.

| Audit phase | Timetable | Audit committee timetable | Deliverables |
|--|---------------------------------------|--|---|
| Planning: Risk assessment and setting of scopes. Walkthrough of key systems and processes Interim audit testing (Started) | August 2021 & October - November 2021 | | |
| Reporting of planning | December 2021 | To be sent round to Audit and Governance Committee | Audit Planning Report |
| Year end audit | November 2021 – January 2022 | | |
| Audit Completion procedures | March 2022 | Audit and Governance Committee | Audit Results Report Audit opinions and completion certificates Annual Audit Report to follow soon after the sign off |

Appendix A

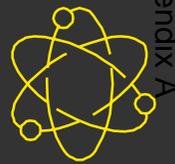
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08

Independence



Introduction

The FRC Ethical Standard and ISA (UK) 260 “Communication of audit matters with those charged with governance”, requires us to communicate with you on a timely basis on all significant facts and matters that bear upon our integrity, objectivity and independence. The Ethical Standard, as revised in June 2019, requires that we communicate formally both at the planning stage and at the conclusion of the audit, as well as during the course of the audit if appropriate. The aim of these communications is to ensure full and fair disclosure by us to those charged with your governance on matters in which you have an interest.

Required communications

| Planning stage | Final stage |
|---|---|
| <ul style="list-style-type: none"> ▶ The principal threats, if any, to objectivity and independence identified by Ernst & Young (EY) including consideration of all relationships between you, your affiliates and directors and us; ▶ The safeguards adopted and the reasons why they are considered to be effective, including any Engagement Quality review; ▶ The overall assessment of threats and safeguards; ▶ Information about the general policies and process within EY to maintain objectivity and independence. ▶ Where EY has determined it is appropriate to apply more restrictive independence rules than permitted under the Ethical Standard. | <ul style="list-style-type: none"> ▶ In order for you to assess the integrity, objectivity and independence of the firm and each covered person, we are required to provide a written disclosure of relationships (including the provision of non-audit services) that may bear on our integrity, objectivity and independence. This is required to have regard to relationships with the entity, its directors and senior management, its affiliates, and its connected parties and the threats to integrity or objectivity, including those that could compromise independence that these create. We are also required to disclose any safeguards that we have put in place and why they address such threats, together with any other information necessary to enable our objectivity and independence to be assessed; ▶ Details of non-audit services provided and the fees charged in relation thereto; ▶ Written confirmation that the firm and each covered person is independent and, if applicable, that any non-EY firms used in the group audit or external experts used have confirmed their independence to us; ▶ Written confirmation that all covered persons are independent; ▶ Details of any inconsistencies between FRC Ethical Standard and your policy for the supply of non-audit services by EY and any apparent breach of that policy; ▶ Details of any contingent fee arrangements for non-audit services provided by us or our network firms; and ▶ An opportunity to discuss auditor independence issues. |

In addition, during the course of the audit, we are required to communicate with you whenever any significant judgements are made about threats to objectivity and independence and the appropriateness of safeguards put in place, for example, when accepting an engagement to provide non-audit services.

We also provide information on any contingent fee arrangements, the amounts of any future services that have been contracted, and details of any written proposal to provide non-audit services that has been submitted;

We ensure that the total amount of fees that EY and our network firms have charged to you and your affiliates for the provision of services during the reporting period, analysed in appropriate categories, are disclosed.

Relationships, services and related threats and safeguards

We highlight the following significant facts and matters that may be reasonably considered to bear upon our objectivity and independence, including the principal threats, if any. We have adopted the safeguards noted below to mitigate these threats along with the reasons why they are considered to be effective. However we will only perform non-audit services if the service has been pre-approved in accordance with your policy.

Overall Assessment

Overall, we consider that the safeguards that have been adopted appropriately mitigate the principal threats identified and we therefore confirm that EY is independent and the objectivity and independence of Andrew Brittain, your audit engagement partner and the audit engagement team have not been compromised.

Self interest threats

A self interest threat arises when EY has financial or other interests in the Authority. Examples include where we receive significant fees in respect of non-audit services; where we need to recover long outstanding fees; or where we enter into a business relationship with you. At the time of writing, there are no long outstanding fees.

We believe that it is appropriate for us to undertake permissible non-audit services and we will comply with the policies that you have approved.

None of the services are prohibited under the FRC's ES or the National Audit Office's Auditor Guidance Note 01 and the services have been approved in accordance with your policy on pre-approval. The ratio of non-audit fees to audit fees is not permitted to exceed 70%.

At the time of writing, the current ratio of non-audit fees to audit fees is nil. No additional safeguards are required.

A self interest threat may also arise if members of our audit engagement team have objectives or are rewarded in relation to sales of non-audit services to you. We confirm that no member of our audit engagement team, including those from other service lines, has objectives or is rewarded in relation to sales to you, in compliance with Ethical Standard part 4.

There are no other self interest threats at the date of this report.

Self review threats

Self review threats arise when the results of a non-audit service performed by EY or others within the EY network are reflected in the amounts included or disclosed in the financial statements.

There are no self review threats at the date of this report.

Management threats

Partners and employees of EY are prohibited from taking decisions on behalf of management of the Authority. Management threats may also arise during the provision of a non-audit service in relation to which management is required to make judgements or decision based on that work.

There are no management threats at the date of this report.

Relationships, services and related threats and safeguards

Other threats

Other threats, such as advocacy, familiarity or intimidation, may arise.

There are no other threats at the date of this report.

Other communications

EY Transparency Report 2020

Ernst & Young (EY) has policies and procedures that instil professional values as part of firm culture and ensure that the highest standards of objectivity, independence and integrity are maintained.

Details of the key policies and processes in place within EY for maintaining objectivity and independence can be found in our annual Transparency Report which the firm is required to publish by law. The most recent version of this Report is for the year ended 30 June 2021 and can be found here:

[EY UK 2021 Transparency Report | EY UK](#)



09

Appendices



Fees

The duty to prescribe fees is a statutory function delegated to Public Sector Audit Appointments Ltd (PSAA) by the Secretary of State for Housing, Communities and Local Government.

This is defined as the fee required by auditors to meet statutory responsibilities under the Local Audit and Accountability Act 2014 in accordance with the requirements of the Code of Audit Practice and supporting guidance published by the National Audit Office, the financial reporting requirements set out in the Code of Practice on Local Authority Accounting published by CIPFA/LASAAC, and the professional standards applicable to auditors' work.

| | Planned fee 2020/21 | Final Fee 2019/20 |
|--|------------------------|----------------------|
| | £ | £ |
| Scale Fee – Code work | 26,180 | 26,180 |
| Proposed increase to the scale fee due to changes in work required to address professional and regulatory requirements and scope associated with risk (Note 1) | 23,727 | 23,727 |
| Scale fee variation – (Note 2) | TBC | 18,500 |
| Total fees | TBC | 64,407 |

Notes:

1. We remain in discussion with PSAA about increasing the scale fee to reflect the additional work auditors are required to do to meet regulatory requirements.
2. The 2019/20 additional fees related to the additional work on pensions, the impact of Covid-19 and the elongated audit period. These have been discussed with management, who have challenged the level of fees in relation to the pensions work. The fee variation has now been referred to PSAA for consideration.

All fees exclude VAT

The agreed fee presented is based on the following assumptions:

- Officers meeting the agreed timetable of deliverables;
- Our accounts opinion and value for money conclusion being unqualified;
- Appropriate quality of documentation is provided by the Authority; and
- The Authority has an effective control environment.

If any of the above assumptions prove to be unfounded, we will seek a variation to the agreed fee. This will be discussed with the Authority in advance.

Fees for the auditor's consideration of correspondence from the public and formal objections will be charged in addition to the scale fee.

Appendix B

Required communications with the Audit Committee

We have detailed the communications that we must provide to the Audit and Governance Committee.

Our Reporting to you

| Required communications |  What is reported? |   When and where |
|-------------------------------------|---|--|
| Terms of engagement | Confirmation by the Audit and Governance Committee of acceptance of terms of engagement as written in the engagement letter signed by both parties. | The statement of responsibilities serves as the formal terms of engagement between the PSAA's appointed auditors and audited bodies. |
| Our responsibilities | Reminder of our responsibilities as set out in the engagement letter | The statement of responsibilities serves as the formal terms of engagement between the PSAA's appointed auditors and audited bodies. |
| Planning and audit approach | Communication of the planned scope and timing of the audit, any limitations and the significant risks identified. | Audit planning report – December 2021 |
| Significant findings from the audit | <ul style="list-style-type: none"> • Our view about the significant qualitative aspects of accounting practices including accounting policies, accounting estimates and financial statement disclosures • Significant difficulties, if any, encountered during the audit • Significant matters, if any, arising from the audit that were discussed with management • Written representations that we are seeking • Expected modifications to the audit report • Other matters if any, significant to the oversight of the financial reporting process | Audit results report – March 2022 |

Required communications with the Audit Committee (continued)

 Our Reporting to you

  When and where

| Required communications |  What is reported? |   When and where |
|-------------------------|--|--|
| Going concern | Events or conditions identified that may cast significant doubt on the entity's ability to continue as a going concern, including: <ul style="list-style-type: none"> • Whether the events or conditions constitute a material uncertainty • Whether the use of the going concern assumption is appropriate in the preparation and presentation of the financial statements • The adequacy of related disclosures in the financial statements | Audit results report – January 2022 |
| Misstatements | <ul style="list-style-type: none"> • Uncorrected misstatements and their effect on our audit opinion, unless prohibited by law or regulation • The effect of uncorrected misstatements related to prior periods • A request that any uncorrected misstatement be corrected • Corrected misstatements that are significant • Material misstatements corrected by management | Audit results report – January 2022 |
| Fraud | <ul style="list-style-type: none"> • Enquiries of the Audit and Governance Committee to determine whether they have knowledge of any actual, suspected or alleged fraud affecting the entity • Any fraud that we have identified or information we have obtained that indicates that a fraud may exist • A discussion of any other matters related to fraud | Audit results report – January 2022 |
| Related parties | <ul style="list-style-type: none"> • Significant matters arising during the audit in connection with the entity's related parties including, when applicable: • Non-disclosure by management • Inappropriate authorisation and approval of transactions • Disagreement over disclosures • Non-compliance with laws and regulations • Difficulty in identifying the party that ultimately controls the entity | Audit results report – January 2022 |

Required communications with the Audit Committee (continued)

| | | |  Our Reporting to you |
|---------------------------------------|--|--|--|
| Required communications |  What is reported? |   When and where | |
| Independence | <p>Communication of all significant facts and matters that bear on EY's, and all individuals involved in the audit, objectivity and independence</p> <p>Communication of key elements of the audit engagement partner's consideration of independence and objectivity such as:</p> <ul style="list-style-type: none"> • The principal threats • Safeguards adopted and their effectiveness • An overall assessment of threats and safeguards • Information about the general policies and process within the firm to maintain objectivity and independence | <p>Audit planning report – October 2021</p> <p>Audit results report – January 2022</p> | |
| External confirmations | <ul style="list-style-type: none"> • Management's refusal for us to request confirmations • Inability to obtain relevant and reliable audit evidence from other procedures | <p>Audit results report – January 2022</p> | |
| Consideration of laws and regulations | <ul style="list-style-type: none"> • Audit findings regarding non-compliance where the non-compliance is material and believed to be intentional. This communication is subject to compliance with legislation on tipping off • Enquiry of the Audit and Governance Committee into possible instances of non-compliance with laws and regulations that may have a material effect on the financial statements and that the Audit and Governance Committee may be aware of | <p>Audit results report – January 2022</p> | |
| Internal controls | <ul style="list-style-type: none"> • Significant deficiencies in internal controls identified during the audit | <p>Audit results report – January 2022</p> | |

Appendix B

Required communications with the Audit Committee (continued)

| | |  Our Reporting to you |
|--|---|--|
| Required communications |  What is reported? |  When and where |
| Representations | Written representations we are requesting from management and/or those charged with governance | Audit results report – January 2022 |
| Material inconsistencies and misstatements | Material inconsistencies or misstatements of fact identified in other information which management has refused to revise | Audit results report – January 2022 |
| Auditors report | <ul style="list-style-type: none"> Any circumstances identified that affect the form and content of our auditor’s report | Audit results report – December 2021 |
| Fee Reporting | <ul style="list-style-type: none"> Breakdown of fee information when the audit plan is agreed Breakdown of fee information at the completion of the audit Any non-audit work | Audit planning report – October 2021 Audit results report – January 2022 |

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Appendix A

Additional audit information

Other required procedures during the course of the audit

In addition to the key areas of audit focus outlined in section 2, we have to perform other procedures as required by auditing, ethical and independence standards and other regulations. We outline the procedures below that we will undertake during the course of our audit.

Our responsibilities required by auditing standards

- Identifying and assessing the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion.
- Obtaining an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Authority's internal control.
- Evaluating the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Concluding on the appropriateness of management's use of the going concern basis of accounting.
- Evaluating the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.
- Obtaining sufficient appropriate audit evidence regarding the financial information of the entities or business activities within the Authority to express an opinion on the consolidated financial statements. Reading other information contained in the financial statements, the Audit and Governance Committee reporting appropriately addresses matters communicated by us to the Audit and Governance Committee and reporting whether it is materially inconsistent with our understanding and the financial statements; and
- Maintaining auditor independence.

Additional audit information (continued)

Purpose and evaluation of materiality

For the purposes of determining whether the accounts are free from material error, we define materiality as the magnitude of an omission or misstatement that, individually or in the aggregate, in light of the surrounding circumstances, could reasonably be expected to influence the economic decisions of the users of the financial statements. Our evaluation of it requires professional judgement and necessarily takes into account qualitative as well as quantitative considerations implicit in the definition. We would be happy to discuss with you your expectations regarding our detection of misstatements in the financial statements.

Materiality determines:

- The locations at which we conduct audit procedures to support the opinion given on the financial statements; and
- The level of work performed on individual account balances and financial statement disclosures.

The amount we consider material at the end of the audit may differ from our initial determination. At this stage, however, it is not feasible to anticipate all of the circumstances that may ultimately influence our judgement about materiality. At the end of the audit we will form our final opinion by reference to all matters that could be significant to users of the accounts, including the total effect of the audit misstatements we identify, and our evaluation of materiality at that date.



ROYAL BERKSHIRE FIRE AUTHORITY REPORT

| | |
|---------------------------|--|
| COMMITTEE | AUDIT AND GOVERNANCE COMMITTEE |
| DATE OF MEETING | 24 JANUARY 2022 |
| SUBJECT | ROYAL BERKSHIRE FIRE AUTHORITY – PAY POLICY STATEMENT 2022/2023 |
| LEAD OFFICER | BECCI JEFFERIES, HEAD OF HR AND LEARNING AND DEVELOPMENT |
| LEAD MEMBER | N/A |
| EXEMPT INFORMATION | NONE |
| ACTION | NOTE AND RECOMMEND |

1. **EXECUTIVE SUMMARY**

- 1.1 Section 38 (1) of the Localism Act 2011 requires the Royal Berkshire Fire Authority to prepare and publish a Pay Policy Statement each financial year. This statement includes information on remuneration for all staff as defined by the Act.

2. **RECOMMENDATION**

That the Audit and Governance:

- 2.1 **NOTE** the draft Pay Policy Statement (Appendix A); and
- 2.2 **RECOMMEND** the draft Pay Policy Statement for 2022/2023 to the Fire Authority for approval.

3. **REPORT**

- 3.1 Sections 38 to 43 of the Localism Act 2011 require that relevant authorities in England prepare a Pay Policy Statement for each financial year. Pay Policy Statements must be approved by a meeting of the full Fire Authority and subsequently published.
- 3.2 Amendments to the draft Pay Policy Statement for the Royal Berkshire Fire Authority (RBFA) for the forthcoming year (2022/2023) is drafted (Appendix A) taking into account guidance issued by the Department of Communities and

Agenda Item 8

Local Government Transparency Code 2014 and the Local Transparency Publishing Organisational Information guidance provided by the Local Government Association in 2015.

- 3.3 Whilst it has not been necessary to amend the format of the Pay Policy Statement for 2022/23, a number of updates have been included and are detailed below.
- 3.4 A revised Car User Scheme was published in September 2021. This provided an enhanced lease car rate for individuals who need an enhanced vehicle specification related to the requirements of their role. The section on Car Provisions has been updated to reflect this.
- 3.5 An updated section relating to the removal of discrimination from public sector pension schemes (including the Firefighters Pension Scheme) and the impact on RBFRS.
- 3.6 Additional information on teams across the service that receive incremental pay increases outside of the annual increments.
- 3.7 Inclusion of information on the number of personnel who receive a role supplement in line with the Role Specific Supplement Policy.
- 3.8 Inclusion of information on the re-structure of the Senior Management Team which took place on 1 December 2021.

4. CONTRIBUTION TO STRATEGIC COMMITMENTS

- 4.1 Commitment 5 – We will ensure that Royal Berkshire Fire and Rescue Service provides good value for money.

5. FINANCIAL IMPLICATIONS

- 5.1 There are no direct financial implications arising from this report

6. LEGAL IMPLICATIONS

- 6.1 This report is prepared to enable Royal Berkshire Fire Authority to meet its obligations under Sections 38 to 43 of the Localism Act 2011 and the Local Transparency Code 2015 and in accordance with issued Government guidance.
- 6.2 The Pay Policy Statement must be approved by the full Fire Authority and therefore if there are any changes, these will be made before it is presented to at the Fire Authority meeting on 15 February 2022.

7. EQUALITY DIVERSITY AND INCLUSION IMPLICATIONS

- 7.1 There are no direct equality issues arising from this report.

8. RISK IMPLICATIONS

8.1 There are no risk management issues arising from this report.

9. CONSISTENCY WITH DUTY TO COLLABORATE

9.1 N/A

10. PRINCIPAL CONSULTATION

The following individuals have been consulted in preparation of this report.

- 10.1 Monitoring Officer
- 10.2 Head of Finance and Procurement
- 10.3 Chief Fire Officer

11. BACKGROUND PAPERS

- 11.1 Localism Act 2011
- 11.2 Openness and Accountability in Local Pay, Guidance under Section 40 of the Localism Act, February 2012, Department for Communities and Local Government.
- 11.3 Openness and Accountability in Local Pay, Guidance under Section 40 of the Localism Act, February 2013, Supplementary Guidance, Department for Communities and Local Government.
- 11.4 Hutton Review of Fair Pay in the Public Sector: Final Report, March 2011
- 11.5 Pay Policy and Practice in Local Authorities – A guide for Councillors, Local Government Association (January 2013) issued November 2013 to Local Authority Chairs
- 11.6 Local Government Transparency Code 2014 – Department for Communities and Local Government, October 2014.
- 11.7 Local Transparency Publishing Organisational Information - Local Government Association 30 November 2015

12. APPENDICES

- 12.1 Appendix A - Royal Berkshire Fire Authority Pay Policy Statement 2022/2023

13. CONTACT DETAILS

- 13.1 Becci Jefferies
Head of Human Resources and Learning and Development
0118 9384670

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ROYAL BERKSHIRE FIRE AUTHORITY

Pay Policy Statement
2022/2023





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Introduction

This Pay Policy Statement reflects the Royal Berkshire Fire Authority's (RBFA) long standing Pay and Reward Strategy, which has been in place since its inception in 1998.

It has been formulated to discharge the RBFA's obligation to publish such a statement as required by Section 38 (1) of the Localism Act 2011. The purpose of this statement is to provide transparency with regard to RBFA's approach to setting the pay of its employees by identifying:

- The methods by which salaries of all employees are determined; and
- The detail and level of remuneration of its most senior staff as defined by the relevant legislation
- The detail and level of remuneration for the lowest level of post/employee
- The ratio of pay of the top earner and that of the median earner

RBFA seeks to balance the need to reward its staff sufficiently to attract, motivate and retain the talented individuals needed to deliver a first class fire and rescue service with the need to ensure that RBFA delivers its strategic commitment of providing good value for money.

This policy statement has been approved by RBFA. It will be subject to review annually and in accordance with new or proposed legislation to ensure that, it remains relevant and effective. Information supplied to inform the Pay Policy Statement will be based on figures available at the time of writing (31 October 2021).



Royal Berkshire Fire Authority Pay Policy Statement 2022/2023

Accountability and Decision Making

The Fire Authority is responsible for decision making in relation to the recruitment, pay, terms and conditions and severance arrangements in relation to its' employees subject to the exercise of delegated powers. The Fire Authority has approved the pay ranges for any post in excess of £100,000 per year on appointment.

Responsibility and Scale

For 2021/2022, RBFA was directly responsible for a budget of £35,788,674 and the employment of 649 staff. The Fire Authority provides services to a total population of 914,859 residents.

The Fire Authority's pay strategy - How is pay determined?

The RBFA's overall approach to determining the pay of its employees is to participate in national collective bargaining for fire-fighters and fire control staff through the National Joint Council (NJC) for Local Authority Fire and Rescue Services; for non-operational support staff through the NJC for Local Government Services and for Directors through NJC for Brigade Managers of Fire and Rescue Services. These arrangements account for a total of 465 employees covered by NJC for Local Authority Fire and Rescue Services, 180 employees covered by NJC for Local Government Services and four covered by NJC for Brigade Managers of Fire and Rescue Services.

The pay scale rates for apprentices have been reviewed and remain well in excess of the National Minimum Wage for apprentices as at 1 April 2021.

The RBFA's long term approach to pay and reward has been to continue to support national pay bargaining as the most effective way to manage payroll costs and the challenge of running a fire and rescue service in one of the highest cost-of-living areas outside London.

RBFA does not pay any location allowances related to the cost of living in Berkshire.

There are occasions where the job evaluation scheme and pay grading structure does not take into account market factors such as market pay rates for specialist and technical project roles, or fluctuating demand for skills in the marketplace. It is therefore sometimes necessary to pay a supplement in addition to base salary in

order to recruit and retain staff. To this end, a Role Specific Supplement Policy has been published to ensure RBFA has a fair, transparent and controlled approach to pay. Currently seven individuals receive a role supplement.

At times we need ad hoc project work to be completed, which is achieved via Framework arrangements or paid on a casual hourly or day rate as appropriate to the task, duration and/or local market rates.

The Fire Authority also operates an individual Merit Payment Scheme to reward individual employees in any staff group as a result of specific exceptional performance in a one off task, sustained high performance within their normal job, or undertaking temporary additional responsibility where another allowance is not applicable.

The NJC for Local Authority Fire and Rescue Services

The NJC for Local Authority Fire and Rescue Services currently provides a nationally agreed competence based pay structure of six roles ranging from Firefighter to Area Manager and a parallel, with fewer levels, structure for Fire Control staff. For each role there is a Role Map and National Occupational Standards have been established.

Firefighters begin their careers as trainees for which there is a separate rate of pay. On satisfactory completion of initial training they move onto the development rate of pay and undertake a Development and Assessment Pathway (DAP). When they have demonstrated competence against the National Occupational Standards they receive competent pay. A similar structure of development and competent pay rates exists for each role, and for roles from Watch Manager to Area Manager, there are two job sizes at each role level for competent staff, which are based on the scale of the duties and responsibilities of the post. Allocation of posts to roles and job sizes within roles is determined through locally agreed evaluation processes.

For staff on Local Authority Fire and Rescue Services conditions, the NJC for Local Authority Fire Services agreed a 1.5 percent increase effective from 1 July 2021.

Other elements of pay include:

- Allowance payments for work undertaken outside the role map
- Continuous Personal Development (CPD) payments
- Locally agreed allowance for Area Managers undertaking a Head of Service role
- An operational allowance for being available to undertake 'Gold' level command
- Station Manager allowances paid to Watch Based Station Managers
- A flexible duty allowance paid to officers undertaking duties as part of the flexible duty rota

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Appendix A

- A one-off payment made to members of the Pension Board for attendance at each Pension Board meeting
- Training allowance for Training Centre Instructors

Full details of the NJC for Local Authority Fire and Rescue Services terms and conditions of service are set out in the Sixth Edition of the NJC Scheme of Conditions of Service and any subsequent updates, Local Agreements reached between the Fire Authority and the Fire Brigades Union and the Fire Authority's Policies.

The NJC for Local Government Services

The NJC for Local Government Services National Agreement on Pay and Conditions of Service, sets the framework for the pay and conditions of service for the Fire Authority's non-operational support staff. This provides a national pay spine which was reviewed in April 2019 following the two year pay agreement reached in 2018 to address the impact on local government employers of the National Living Wage increases. At the time of writing, the 2021 pay award had not yet been agreed. RBFRS uses the pay ranges identified within the National pay scales, localised to reduce the number of spinal column points (SCP) within each grade and further extended to provide ten pay grades. Posts are allocated to a grade through a process of job evaluation using the HAY job evaluation methodology.

Staff are appointed to a spinal column point (SCP) in the appropriate pay grade and progress subject to satisfactory performance confirmed through an annual appraisal (Performance and Development Review (PDR), to the top of their pay scale by annual increments on the first of April each year. Based on the outcome of PDRs, there are provisions for the acceleration or stopping of incremental progression. In order to avoid possible claims for age discrimination, there are no more than six SCPs in each grade range.

Fire Safety Inspecting Officers (FSIOs) progress through pay grades as they complete nationally recognised fire safety qualifications. Trainees in Procurement are able to receive increment SCP increases within their Grade subject to the achievement of the relevant examinations in addition to annual increments.

Senior Managers' Pay

A new Senior Leadership Team (SLT) structure was put in place with effect from 1 December 2021. This structure retains four positions designated as Chief Fire Officer/Chief Executive (CFO/CEX), Deputy Chief Executive/Director of Corporate Services (DCEX), Deputy Chief Fire Officer/Director of Operations and Collaboration (DCFO) and Assistant Chief Fire Officer/Director of Service Delivery (ACFO)

Conditions of service for the CFO/CEX, DCFO, DCEX and ACFO are aligned with those set out in the National Joint Council for Brigade Managers of Fire and Rescue Services Constitution and Scheme of Conditions of Service. The DCEX is aligned to the Joint National Council for Joint Chief Officers of Local Authorities – Constitution, Conditions of Service, and Salaries document; A decision by the CFO on 20 June 2016, aligned the pay award for the non-operational Director (DCEX position) to those set out in the National Joint Council for Brigade Managers of Fire and Rescue Services.

The CFO/CEX, DCEX, DCFO and ACFO are each placed on a five point pay range set by the Fire Authority:

| | | | | | | | | |
|-----|------|----------|-----------|------|----------|------|------|----------|
| CFO | CO16 | £134,576 | DCFO/DCEX | CO11 | £108,230 | ACFO | CO9 | £99,815 |
| | CO17 | £139,009 | | CO12 | £111,925 | | CO10 | £102,672 |
| | CO18 | £143,453 | | CO13 | £115,617 | | CO11 | £108,230 |
| | CO19 | £148,579 | | CO14 | £119,311 | | CO12 | £111,925 |
| | CO20 | £153,570 | | CO15 | £130,132 | | CO13 | £115,617 |

The Chairman and Vice-Chairman determine where on the agreed pay scale the CFO/CEX is placed, based upon year-end performance appraisals. The RBFA have determined that the CFO/CEX, as Head of Paid Service determines where on the agreed pay scales the Directors are placed based upon year-end performance appraisals. A 1.5 per cent increase on was agreed for Directors which took effect from 1 January 2021.

In addition the operational CFO/CEX, DCFO and ACFO are entitled to a vehicle for use in connection with Fire Authority business. Those in these roles are entitled to a Provided Car or receive the enhanced rate of £3,500 as a contribution towards a lease car. This is in line with the contributions towards a lease car for other eligible staff as outlined in the Car User Scheme. The non-operational DCEX receives a Car Allowance of £1239 per annum.

The operational Director posts (CFO, DCFO and ACFO) also receive an additional allowance for providing out of hours operational incident command cover and services based on 10% of the mid-point of the Assistant Chief Fire Officer salary range, currently £10,823 per annum.

There are no other bonuses or additional payments currently made to the Directors. In the event a merit payment is made, details will be included in the annual report to the Management Committee.

Senior Managers' pay (i.e. Grade 7 to 10, Area Managers and Directors) accounts for 7.34% of the total pay bill (which includes all taxable earnings, including base salary, variable pay, allowances and lease car cash value).

Agenda Item 8

Appendix A

Benefits Other Than Pay

Pensions

The RBFA offers membership of the Firefighters' Pension Scheme (2015) to newly appointed staff engaged in operational fire-fighting. Non-operational support staff and Control Staff are offered membership of the Local Government Pension Scheme (LGPS). Following the introduction of the 2015 Firefighters' Pension Scheme (2015 FPS) on 1 April 2015 transitional arrangements for members of the Firefighters Pension Scheme 1992 (FPS), the New Firefighters Pension Scheme 2006 (NFPS) and individuals in the Retained Modified Scheme 2006 were put in place.

Currently, the majority of the existing operational workforce are members of the 2015 Firefighters Pension Scheme. From 1 April 2022, all those who continue in service will become members of the 2015 scheme.

In 2015 most public service pension schemes were reformed. These reforms included 'transitional protection', for people closer to retirement. The Courts have ruled that this directly discriminated against some younger pension scheme members. On 19 July 2021 HM Treasury's introduced the Public Services Pensions and Judicial Offices Bill (PSPJO) which sets out in law HMT's solution to the age discrimination. The impact on RBFA is likely to be significant and will continue to be monitored.

The respective contributions made by the RBFA and employees who are members of these pension schemes, from 1 April 2021 are as follows (in all cases members are auto-enrolled into the appropriate pension scheme in accordance with legislation in relation to workplace pensions):

| Scheme | Employer Contributions | Employee Contribution Bands |
|------------------------|------------------------|-----------------------------|
| FPS (1992 Scheme) | 37.3% | 11% - 17% |
| NFPS (2006 Scheme) | 27.4% | 8.5% - 12.5% |
| 2015 FPS (2015 Scheme) | 28.8% | 11% - 14.5% |
| LGPS | 13.5*% | 5.5% - 12.5% |

* Employer contributions for members of the LGPS scheme are set at 13.5% of annual salary. RBFA also pays an employer annual lump sum to the pension fund of £366,000

Car Provision

The RBFA offers a Car User Scheme to staff who are required have access to a vehicle to be used in connection with their official duties. A revised Car User

Scheme was adopted in September 2021 to ensure a fair and equitable process for determining the provisions for staff across the service. The scheme is in three parts:

1. Lease Cars – Lease Cars are available for essential car users. The annual allowance is as follows:
 - Standard rate of £2,000 per annum
 - Enhanced rate of £3,500 per annum

The enhanced lease car rate is provided for individuals who need an enhanced vehicle specification specifically related to the requirement of their role. This includes Flexible Duty Officers who are required to have a vehicle with a defined specification as outlined in the Car User Scheme. Any payment of the enhanced rate for non-Flexible Duty Officers is subject to approval by the appropriate Head of Service.

2. Provided Cars - following a change in taxation rules for car users, a Provided Car Scheme is available for Flexible Duty Officers (FDO) as an alternative to a lease car. The Fire Authority also maintains a pool of provided vehicles for use by other members of staff requiring access to a vehicle as part of their role.
3. Car Allowance – a car allowance of up to £1,239 per annum is payable to those using their own car, for those not eligible for a lease car, should they meet the criteria outlined in the Car User Scheme.

Cycle to Work Scheme

RBFA participate in the national “Cycle to Work” scheme through which its employees hire bicycles to use for travelling to and from work.

Subscriptions

Individuals required by RBFA to be members of professional bodies in relation to their duties are reimbursed subscription fees.

Uniform

The RBFA provides uniform clothing for its operational firefighting and Control Room staff and some Green Book staff engaged in public facing activities such as prevention work, Fire Safety Inspecting Officers and HQ reception staff. A number of other staff are provided with work wear as required for the purpose of their role. In addition, the operational firefighting staff are issued with and required to wear Personal Protective Equipment when undertaking operational duties.

Employee Assistance Programme

The RBFA provides an employee assistance programme for all its staff.

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Occupational Health Support

The RBFA provides an Occupational Health Service to all its staff which seeks to keep them fit and well to undertake their duties and to ensure their speedy and safe return to work when they are injured or sick.

Healthcare Provision

Where appropriate and cost effective, the RBFA may pay for physiotherapy, private medical assessment and/or treatment for its staff in order to secure their more rapid return to work following injury or sickness.

RBFA also provides the opportunity for staff to access the Benenden employee healthcare scheme at no direct cost to employees other than tax due on the benefit. This is currently at a cost of £11.50, for those who choose to opt into the scheme. As at 31 October 2021, there were 444 members of the scheme.

Outplacement Support

In the rare event of employment being terminated on the grounds of redundancy, RBFA may provide appropriate outplacement support to the employee(s) concerned in order to assist them to find alternative employment elsewhere.

Highest and Lowest Paid Employees

The CFO/CEX is the RBFA's highest paid employee. The policy regarding his remuneration is set out in RBFA's Senior Managers Pay section.

The CFO/CEX is selected by an RBFA Members' Appointment Panel following a comprehensive selection process and national advertising campaign.

Remuneration packages (as at 31 October 2021):

| | Basic Salary and (operational command allowance (per annum) | Total remuneration (including pension contributions and car provision) |
|--|---|--|
| CFO/CEX | £154,276 | £202,207.49 |
| Lowest paid employee (excluding Apprentices) | £21,748 | £25,445.16 |
| Competent Firefighter | £32,244 | £39,240.95 (1992 scheme) £36,081.04 (2006 scheme) £36,854.89 (2015 scheme) |

From April 2022, the compulsory government National Living Wage for workers over 23 years of age and over is £9.50 per hour. Please note the National Living Wage is distinct from the Living Wage, which is the level of pay recommended by the Living Wage Foundation, an independent campaign group. In assessing this requirement on current pay arrangements in RBFA it is noted that the lowest paid post to which an employee would be recruited would attract an hourly rate of £11.27 (excluding apprentices on apprenticeship rates of pay).

Given that staff pay and benefits dominate the RBFA budget, the current and anticipated future reductions in RBFA's financial resources mean that these costs are and will continue to be under close scrutiny.

RBFRS has in some cases found it difficult recruit suitable professionally qualified staff through normal channels and in some areas the use of interim agency staff or contractors working outside of IR35 legislation, is in place.

Reviews will be required to ensure appropriate remuneration is in place to attract and retain staff as structures within the Service are examined. Consideration of the total reward available to respond to changing organisational pressures and the linkages between pay and performance and redesigned structures will continue to be explored through organisational change programmes to ensure staff are attracted to, and retained by RBFA. In accordance with our Equality Policy, pay is monitored and reviewed. An equal pay audit was completed during 2019/20. The next equal pay audit will be undertaken in March 2022. RBFA has published its Gender Pay Gap report in line with legislation, which can be viewed on the Services' website and also at gov.uk. RBFA will also publish an Ethnicity Pay Gap Report which will be available on the Services' website.

Pay Multiples

The relationship between the rate of pay for the median full time equivalent earnings and the highest paid employee excluding pension, can be described as the pay multiple.

The multiple between the median full time equivalent earnings and the CFO/CEX is 1:4.56.

Payments on Termination of Employment

Compensation Policy

The RBFA currently exercises its discretions under the Local Government (Early Termination of Employment), (Discretionary Compensation) Regulations 2006 to enhance statutory redundancy payments by paying one and a half times the Statutory Redundancy Pay Table and waiving the statutory maximum week's pay for calculation of redundancy payments. These discretions only apply to staff who are

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offered membership of the LGPS, that is Fire Control Staff and non-operational support staff.

Uniformed operational staff at all levels are not currently covered by the Local Government (Early Termination of Employment) (Discretionary Compensation) Regulations 2006 and in the event of redundancy, their compensation is limited to statutory redundancy pay.

Pensions Policy

RBFA has adopted a policy of considering the re-engagement of its retired operational staff subject to certain conditions. In the event that re-engagement of a retiree takes place, their pension payments will be abated (up to 100%) to ensure that they do not earn more in retirement than they did immediately prior to their retirement. Refer to the Pensions and Retirement Planning Policy.

Publication of Pay Statement

Upon approval of the full Fire Authority, this statement will be published on RBFA's web site. In addition RBFA publishes the following details for Directors for the two most recent years in its Annual Statement of Accounts:-

- Salary including fees and allowances
- Any sums payable by way of expenses allowance that are chargeable to UK income tax (Benefits in Kind/Car Allowance)
- Total Remuneration excluding pensions
- Employer Pension Contributions
- Total Remuneration including pensions

In addition, RBFA publishes the numbers of employees earning £50,000 and over in bandings of £5,000 and any compensation for loss of employment and any other payments connected with termination

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ROYAL BERKSHIRE FIRE AUTHORITY REPORT

| | |
|---------------------------|---|
| COMMITTEE | AUDIT AND GOVERNANCE COMMITTEE |
| DATE OF MEETING | 24 JANUARY 2022 |
| SUBJECT | MEMBER CODE OF CONDUCT REVIEW AND CONSULTATION |
| LEAD OFFICER | GRAHAM BRITTEN, MONITORING OFFICER |
| LEAD MEMBER | COUNCILLOR TINA MCKENZIE-BOYLE |
| EXEMPT INFORMATION | NONE |
| ACTION | FOR DECISION |

1. EXECUTIVE SUMMARY

- 1.1 CO34 of the Audit and Governance Terms of Reference require Members of this Committee to recommend to the Authority the adoption or revision of the Members Code of Conduct.
- 1.2 The Fire Authority at its meeting on 16 November 2020 agreed that the Code of Conduct be reviewed on an annual basis commencing 2021/22 and where possible, take into account the views of the public, community organisations, and neighbouring and appointing authorities, minute reference 25.
- 1.3 This report is seeking Audit and Governance Committee to agree a six week public consultation, commencing 28 January 2022 on views and comments to adopt a Code based on the Local Government Association's (LGA) Model Code of Conduct.
- 1.4 For the remainder of this report, the amended Code will be referred to as Draft Royal Berkshire Fire Authority (RBFA) Member Code of Conduct.

2. RECOMMENDATION

That Audit and Governance Committee:

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- 2.1 **AGREE** a six week consultation commencing 28 January 2022 be held on the adoption by the Authority of the Draft RBFA Member Code of Conduct amended where highlighted (Appendix A);
- 2.2 **AGREE** the Draft RBFA Member Code of Conduct Consultation questions as set out in paragraph 3.14 and
- 2.3 **AGREE** that consultation findings be brought back to Audit and Governance Committee for recommendation to the Fire Authority.

3. REPORT

- 3.1 In November 2020, Members of the Audit and Governance Committee recommended that the Fire Authority; note the findings and actions from the audit against the 15 best practice recommendations made by the Committee on Standards in Public Life (CSPL), and that a review of the Code of Conduct be held annually commencing 2021/22, and where possible take into account the views of the public, community organisations, and neighbouring and appointing authorities.
- 3.2 The CSPL report made 26 recommendations, the vast majority aimed at Local Government to implement through legislative changes; one was for the Local Government Association (LGA) to: *“create an updated model code of conduct, in consultation with representative bodies of councillors and officers of all tiers of local government”*
- 3.4 Members may recall that Democratic Support carried out an audit against the 15 best practice recommendations following the July 2020 letter received from CSPL, informing that they expect their best practice recommendations to be implemented and would be writing to Local Authorities again “in the autumn to ask [...]for [...] progress against these recommendations.
- 3.5 Members may also recall that the report recommended that the implementation of 15 best practice recommendations would be made when the LGA Model Code of Conduct had been published.
- 3.6 On 23 December 2020, the Local Government Association (LGA) published a Model Member Code of Conduct, following its June 2020 consultation; with updated versions published on 19 January, and 17 May 2021. On 8 July 2021 the LGA published guidance on the Model (Appendix B).
- 3.7 In May 2021, the Fire Standards Board published a Code of Ethics aimed at all Fire and Rescue Services for implementation. The Code of Ethics was developed in response to the State of Fire Report 2019, and was one of the recommendations by Her Majesty’s Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) to establish a code of ethics for all fire service employees.

3.8 The Core Code of Ethics for Fire and Rescue Services has been included as an appendix to the document (Appendix Three). Members will be aware that the Core Code of Ethics will be recommended to this Committee for approval in Royal Berkshire Fire and Rescue Services' Employee Code of Conduct and it will be embedded in a number of internal and external documents throughout the Service as and when they are required to be updated.

3.9 The inclusion of the Core Code of Ethics demonstrates the adoption of the principles of the Code in everything we do as Royal Berkshire Fire Authority (RBFA) and Royal Berkshire Fire and Rescue Service (RBFRS). Councillor Nick Chard; LGA Lead, CFO Rebecca Bryant; NFCC Lead and Police Fire Crime Commissioner (PFCC) Roger Hirst; AFCC Lead has stated the following,

'The principles should be embedded within everything that FRSs and their employees do. FRSs will ensure that the principles of this Core Code are represented within policies and processes and are at the heart of day-to-day activity.'

The Core Code is written as a 'Core' Code to recognise differing governance arrangements and is flexible enough for every service to adopt. Fire and Rescue Authorities and Services can add to the Code to reflect their local values, behaviours, and governance arrangements, including where they:

- *Are part of a county council and obliged to comply with the council's code*
- *Have existing well-developed ethical codes that can be reviewed against the Core Code.*

*We encourage you all to read, understand, and commit to the ethical principles set out in the Core Code.'*¹

3.10 Appendix A is predominately the adopted LGA Model Code of Conduct. The amendments are highlighted in yellow for ease of reference, it includes information on the complaints procedure, taken from the existing Member Code of Conduct, references requiring councillors to comply with any formal standards of investigation and a hyperlink to the Member / Officer protocol.

3.11 In addition, references relating to Town and Parish Councillors has been removed from the original LGA Model Code of Conduct, as Appendix A has been amended to solely refer to councillors that have been appointed onto the Fire Authority.

3.12 Three Unitary Authorities, (Royal Borough of Windsor and Maidenhead (RBWM), Wokingham Borough Council and Slough Borough Council) have all

¹ Core Code of Ethics for Fire and Rescue Services (England).

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adopted the LGA Model Code of Conduct and have made small differences relevant to their respective authorities. For example, RBWM and Wokingham Borough Council have maintained the threshold value of gifts and hospitality to declare at £25, whereas Slough Borough Council has adopted the LGA's increase in value to £50.

- 3.13 Appendix A, paragraph 10.3 (Gifts and Hospitality) is in line with the LGA Model Code in relation to the estimated value of gifts and hospitality to declare is £50. In RBFA's current Member Code of Conduct the threshold for registering gifts and hospitality is £25. The proposed increase of the threshold to £50 has been taken from the responses received from the LGA Model Member Code of Conduct Consultation analysis, November 2020. *'Among the respondents who thought the threshold should be higher 64 per cent suggested it should be raised to £50.'*²
- 3.14 The consultation survey will be anonymous, it will include questions to obtain the demographic of respondents and it is proposed the following three questions are asked to keep the survey response time to approximately five minutes.
- *Do you support the behaviours required of councillors, as set out in the Draft RBFA Code of Conduct when they are publicly representing Royal Berkshire Fire Authority on official business and when using social media? Yes / No / please explain*
 - *Do you think the expected standards of councillor conduct and the actions that could be taken should an allegation be made, are clear? Yes / No / please explain*
 - *Have you got any other comments you would like to make on the Draft RBFA Model Code of Conduct. Yes / No / please explain*
- 3.15 At the time of writing this report, Bracknell Forest Council, Reading Borough Council and West Berkshire Council intend to review their Code of Conduct in 2022/23.
- 3.16 This report is seeking Members to agree a six week public consultation commencing 28 January 2022 on the public's views on the adoption of the Draft RBFA Member Code of Conduct (Appendix A), and agree the proposed three consultation questions as set out in paragraph 3.14.

4. CONTRIBUTION TO STRATEGIC COMMITMENTS

² LGA Model Member Code of Conduct: Consultation response analysis, November 2020

4.1 Commitment 5 – We will ensure that Royal Berkshire Fire and Rescue Service provides good value for money.

4.2 Commitment 6 – We will work with Central Government and key stakeholders in the interests of the people of Royal Berkshire.

5. FINANCIAL IMPLICATIONS

5.1 There are no direct financial implications relevant to the report.

6. LEGAL IMPLICATIONS

6.1 Section 27 of the Localism Act 2011 requires relevant authorities to promote and maintain high standards of conduct by Members and Co-Opted Members of the authority. Each local authority must publish a code of conduct.

7. EQUALITY AND DIVERSITY IMPLICATIONS

7.1 There are no negative equality and diversity implications from the recommendations.

8. RISK IMPLICATIONS

8.1 The recommendation will have no adverse effect on the conduct or delivery of the Authority's functions.

9. CONSISTENCY WITH DUTY TO COLLABORATE

9.1 Future updates to the Code of Conduct and future consultations thereof will be made with Fire Authority partners and communities.

10. PRINCIPAL CONSULTATION

10.1 Chief Fire Officer was consulted during the preparation of this report.

10.2 The Head of Finance and Procurement was consulted during the preparation of this report.

10.3 Monitoring Officer report author.

11. BACKGROUND PAPERS

11.1 Local government ethical standards: report Committee on Standards in Public Life twentieth report, Local Government Ethical Standards, published 30 January 2019.

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- 11.2 LGA Model Code of Conduct
- 11.3 Fire Standards Board Code of Ethics
- 11.4 Wokingham Borough Council Constitution
- 11.5 Royal Borough of Windsor and Maidenhead Council minutes on 27 April 2021
- 11.6 Slough Borough Council Constitution
- 11.7 Core Code of Ethics for Fire and Rescue Services (England)
- 11.8 LGA Model Member Code of Conduct: Consultation response analysis, November 2020

12. APPENDICES

- 12.1 Appendix A – Member Code of Conduct

13. CONTACT DETAILS

- 13.1 Graham Britten, Monitoring Officer 01296 744441
- 13.2 Fayth Rowe, Democratic Support Lead 0118 938 4611

DRAFT Royal Berkshire Fire Authority (RBFA) Member Code of Conduct

January 2022





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Code of Conduct

Joint Statement

The role of councillor across all tiers of local government is a vital part of our country's system of democracy. It is important that as councillors we can be held accountable and all adopt the behaviours and responsibilities associated with the role. Our conduct as an individual councillor affects the reputation of all councillors. We want the role of councillor to be one that people aspire to. We also want individuals from a range of backgrounds and circumstances to be putting themselves forward to become councillors. As councillors, we represent local residents, work to develop better services and deliver local change. The public have high expectations of us and entrust us to represent our local area, taking decisions fairly, openly, and transparently. We have both an individual and collective responsibility to meet these expectations by maintaining high standards and demonstrating good conduct, and by challenging behaviour which falls below expectations. Importantly, we should be able to undertake our role as a councillor without being intimidated, abused, bullied, or threatened by anyone, including the general public. This Code has been designed to protect our democratic role, encourage good conduct and safeguard the public's trust in local government.

Introduction

The Local Government Association (LGA) has developed this Model Councillor Code of Conduct, in association with key partners and after extensive consultation with the sector, as part of its work on supporting all tiers of local government to continue to aspire to high standards of leadership and performance. It is a template for councils to adopt in whole and/or with local amendments. All councils are required to have a local Councillor Code of Conduct. The LGA will undertake an annual review of this Code to ensure it continues to be fit- for purpose, incorporating advances in technology, social media and changes in legislation. The LGA can also offer support, training and mediation to councils and councillors on the application of the Code and the National Association of Local Councils (NALC) and the county associations of local councils can offer advice and support to town and parish councils.

Definitions

For the purposes of this Code of Conduct, a "councillor" means a member or co-opted member of a local authority or a directly elected mayor. A "co-opted member" is defined in the Localism Act 2011 Section 27(4) as "a person who is not a member of the authority but who

- a) is a member of any committee or sub-committee of the authority, or;

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- b) is a member of, and represents the authority on, any joint committee or joint subcommittee of the authority; and who is entitled to vote on any question that falls to be decided at any meeting of that committee or sub-committee”.

For the purposes of this Code of Conduct, “local authority” includes county councils, district councils, London borough councils, parish councils, town councils, fire and rescue authorities, police authorities, joint authorities, economic prosperity boards, combined authorities and National Park authorities.

Purpose of the Code of Conduct

The purpose of this Code of Conduct is to assist you, as a councillor, in modelling the behaviour that is expected of you, to provide a personal check and balance, and to set out the type of conduct that could lead to action being taken against you. It is also to protect you, the public, fellow councillors, local authority officers and the reputation of local government. It sets out general principles of conduct expected of all councillors and your specific obligations in relation to standards of conduct. The LGA encourages the use of support, training and mediation prior to action being taken using the Code. The fundamental aim of the Code is to create and maintain public confidence in the role of councillor and local government.

General principles of councillor conduct

Everyone in public office at all levels; all who serve the public or deliver public services, including ministers, civil servants, councillors and local authority officers; should uphold the Seven Principles of Public Life, also known as the Nolan Principles (Appendix A).

Building on these principles, and of those of the National Fire Chief Council (NFCC) Code of Ethics (Appendix C) the following general principles have been developed specifically for the role of councillor. In accordance with the public trust placed in me, on all occasions:

- I act with integrity and honesty
- I act lawfully
- I treat all persons fairly and with respect; and
- I lead by example and act in a way that secures public confidence in the role of councillor.

In undertaking my role:

- I impartially exercise my responsibilities in the interests of the local community

- I do not improperly seek to confer an advantage, or disadvantage, on any person
- I avoid conflicts of interest
- I exercise reasonable care and diligence; and
- I ensure that public resources are used prudently in accordance with my local authority's requirements and in the public interest.

Application of the Code of Conduct

This Code of Conduct applies to you as soon as you sign your declaration of acceptance of the office of councillor or attend your first meeting as a co-opted member and continues to apply to you until you cease to be a councillor.

This Code of Conduct applies to you when you are acting in your capacity as a councillor which may include when:

- you misuse your position as a councillor
- Your actions would give the impression to a reasonable member of the public with knowledge of all the facts that you are acting as a councillor;

The Code applies to all forms of communication and interaction, including:

- at face-to-face meetings
- at online or telephone meetings
- in written communication
- in verbal communication
- in non-verbal communication
- in electronic and social media communication, posts, statements and comments.

You are also expected to uphold high standards of conduct and show leadership at all times when acting as a councillor.

Standards of councillor conduct

This section sets out your obligations, which are the minimum standards of conduct required of you as a councillor. Should your conduct fall short of these standards, a complaint may be made against you, which may result in action being taken.

Guidance is included to help explain the reasons for the obligations and how they should be followed.

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Your Monitoring Officer has statutory responsibility for the implementation of the Code of Conduct, and you are encouraged to seek advice from your Monitoring Officer on any matters that may relate to the Code of Conduct.

Should a complaint be made against you in your role as councillor or co-opted member, it will be dealt with in accordance with the provisions of the Localism Act 2011 and its supporting Regulations.

If allegations are made against you they will be handled by the Monitoring Officer in consultation with Independent Persons appointed by RBFA in accordance with RBFA's adopted procedure. They will determine the allegation and prohibit trivial or malicious allegations by councillors. The procedure on How to make a Complaint about a Fire Authority Member is outlined [here](#).

Councillors are required to comply with any formal standards investigation conducted by the Monitoring Officer and Independent Persons.

If there is a conflict of interest in the Authority's Monitoring Officer carrying out the investigation, a Monitoring Officer from a neighbouring Authority will be asked to conduct the formal investigation.

Where the Authority makes a decision on an allegation of misconduct following formal investigation, a decision notice will be published as soon as possible on its website.

General Conduct

1. Respect

As a councillor:

- 1.1 I treat other councillors and members of the public with respect.
- 1.2 I treat local authority employees, employees and representatives of partner organisations and those volunteering for the local authority with respect and respect the role they play.

Respect means politeness and courtesy in behaviour, speech, and in the written word. Debate and having different views are all part of a healthy democracy. As a councillor, you can express, challenge, criticise and disagree with views, ideas, opinions and policies in a robust but civil manner. You should not, however, subject individuals, groups of people or organisations to personal attack.

In your contact with the public, you should treat them politely and courteously. Rude and offensive behaviour lowers the public's expectations and confidence in councillors.

In return, you have a right to expect respectful behaviour from the public. If members of the public are being abusive, intimidatory or threatening you are entitled to stop any conversation or interaction in person or online and report them to the local authority, the relevant social media provider or the police. This also applies to fellow councillors, where action could then be taken under the Councillor Code of Conduct, and local authority employees, where concerns should be raised in line with the local authority's **Member/Officer protocol**.

2. Bullying, harassment and discrimination

As a councillor:

2.1 I do not bully any person.

2.2 I do not harass any person.

2.3 I promote equalities and do not discriminate unlawfully against any person.

The Advisory, Conciliation and Arbitration Service (ACAS) characterises bullying as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient. Bullying might be a regular pattern of behaviour or a one-off incident, happen face-to-face, on social media, in emails or phone calls, happen in the workplace or at work social events and may not always be obvious or noticed by others.

The Protection from Harassment Act 1997 defines harassment as conduct that causes alarm or distress or puts people in fear of violence and must involve such conduct on at least two occasions. It can include repeated attempts to impose unwanted communications and contact upon a person in a manner that could be expected to cause distress or fear in any reasonable person.

Unlawful discrimination is where someone is treated unfairly because of a protected characteristic. Protected characteristics are specific aspects of a person's identity defined by the Equality Act 2010. They are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The Equality Act 2010 places specific duties on local authorities. Councillors have a central role to play in ensuring that equality issues are integral to the local authority's performance and strategic commitments, and that there is a strong vision and public commitment to equality across public services.

3. Impartiality of officers of **Royal Berkshire Fire Authority**

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As a councillor:

3.1 I do not compromise, or attempt to compromise, the impartiality of anyone who works for, or on behalf of, Royal Berkshire Fire Authority.

Officers work for Royal Berkshire Fire Authority as a whole and must be politically neutral. They should not be coerced or persuaded to act in a way that would undermine their neutrality. You can question officers in order to understand, for example, their reasons for proposing to act in a particular way, or the content of a report that they have written. However, you must not try and force them to act differently, change their advice, or alter the content of that report, if doing so would prejudice their professional integrity.

4. Confidentiality and access to information

As a councillor:

4.1 I do not disclose information:

- a. given to me in confidence by anyone
- b. acquired by me which I believe, or ought reasonably to be aware, is of a confidential nature, unless
 - i. I have received the consent of a person authorised to give it;
 - ii. I am required by law to do so;
 - iii. the disclosure is made to a third party for the purpose of obtaining professional legal advice provided that the third party agrees not to disclose the information to any other person; or
 - iv. the disclosure is:
 1. reasonable and in the public interest; and
 2. made in good faith and in compliance with the reasonable requirements of the local authority; and
 3. I have consulted the Monitoring Officer prior to its release.

4.2 I do not improperly use knowledge gained solely as a result of my role as a councillor for the advancement of myself, my friends, my family members, my employer or my business interests.

4.3 I do not prevent anyone from getting information that they are entitled to by law.

Local authorities must work openly and transparently, and their proceedings and printed materials are open to the public, except in certain legally defined

circumstances. You should work on this basis, but there will be times when it is required by law that discussions, documents and other information relating to or held by the local authority must be treated in a confidential manner. Examples include personal data relating to individuals or information relating to ongoing negotiations.

5. Disrepute

As a councillor:

5.1 I do not bring my role or local authority into disrepute.

As a Councillor, you are trusted to make decisions on behalf of your community and your actions and behaviour are subject to greater scrutiny than that of ordinary members of the public. You should be aware that your actions might have an adverse impact on you, other councillors and/or your local authority and may lower the public's confidence in your or your local authority's ability to discharge your/its functions. For example, behaviour that is considered dishonest and/or deceitful can bring your local authority into disrepute.

You are able to hold the local authority and fellow councillors to account and are able to constructively challenge and express concern about decisions and processes undertaken by the council whilst continuing to adhere to other aspects of this Code of Conduct.

6. Use of position

As a councillor:

6.1 I do not use, or attempt to use, my position improperly to the advantage or disadvantage of myself or anyone else.

Your position as a member of the local authority provides you with certain opportunities, responsibilities, and privileges, and you make choices all the time that will impact others. However, you should not take advantage of these opportunities to further your own or others' private interests or to disadvantage anyone unfairly.

7. Use of Royal Berkshire Fire Authority resources and facilities

As a councillor:

7.1 I do not misuse Royal Berkshire Fire Authority resources.

7.2 I will, when using the resources of the local authority or authorising their use by others:

- a. act in accordance with Royal Berkshire Fire Authority's requirements;**
and

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- b. ensure that such resources are not used for political purposes unless that use could reasonably be regarded as likely to facilitate, or be conducive to, the discharge of the functions of **Royal Berkshire Fire Authority** or of the office to which I have been elected or appointed.**

You may be provided with resources and facilities by the local authority to assist you in carrying out your duties as a councillor.

Examples include:

- office support
- stationery
- equipment such as phones, and computers
- transport
- access and use of local authority buildings and rooms.

These are given to you to help you carry out your role as a councillor more effectively and are not to be used for business or personal gain. They should be used in accordance with the purpose for which they have been provided and the local authority's own policies regarding their use.

8. Complying with the Code of Conduct

As a Councillor:

- 8.1 I undertake Code of Conduct training provided by my local authority.**
- 8.2 I cooperate with any Code of Conduct investigation and/or determination.**
- 8.3 I do not intimidate or attempt to intimidate any person who is likely to be involved with the administration of any investigation or proceedings.**
- 8.4 I comply with any sanction imposed on me following a finding that I have breached the Code of Conduct.**

It is extremely important for you as a councillor to demonstrate high standards, for you to have your actions open to scrutiny and for you not to undermine public trust in the local authority or its governance. If you do not understand or are concerned about the local authority's processes in handling a complaint you should raise this with your Monitoring Officer.

Protecting your reputation and the reputation of the local authority

9. Interests

As a councillor:

9.1 I register and disclose my interests.

Section 29 of the Localism Act 2011 requires the Monitoring Officer to establish and maintain a register of interests of members of the authority.

You need to register your interests so that the public, local authority employees and fellow councillors know which of your interests might give rise to a conflict of interest. The register is a public document that can be consulted when (or before) an issue arises. The register also protects you by allowing you to demonstrate openness and a willingness to be held accountable. You are personally responsible for deciding whether or not you should disclose an interest in a meeting, but it can be helpful for you to know early on if others think that a potential conflict might arise. It is also important that the public know about any interest that might have to be disclosed by you or other councillors when making or taking part in decisions, so that decision making is seen by the public as open and honest. This helps to ensure that public confidence in the integrity of local governance is maintained.

You should note that failure to register or disclose a disclosable pecuniary interest as set out in Table 1, is a criminal offence under the Localism Act 2011.

Appendix B sets out the detailed provisions on registering and disclosing interests. If in doubt, you should always seek advice from your Monitoring Officer.

10. Gifts and hospitality

As a councillor:

10.1 I do not accept gifts or hospitality, irrespective of estimated value, which could give rise to real or substantive personal gain or a reasonable suspicion of influence on my part to show favour from persons seeking to acquire, develop or do business with the local authority or from persons who may apply to the local authority for any permission, licence or other significant advantage.

10.2 I register with the Monitoring Officer any gift or hospitality with an estimated value of at least £50 within 28 days of its receipt.

10.3 I register with the Monitoring Officer any significant gift or hospitality that I have been offered but have refused to accept.

In order to protect your position and the reputation of the **Royal Berkshire Fire Authority**, you should exercise caution in accepting any gifts or hospitality which are (or which you reasonably believe to be) offered to you because you are a councillor. The presumption should always be not to accept significant gifts or hospitality. However, there may be times when such a refusal may be difficult if it is seen as rudeness in which case you could accept it but must ensure it is publicly registered. However, you do not need to register gifts and hospitality which are not related to

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your role as a councillor, such as Christmas gifts from your friends and family. It is also important to note that it is appropriate to accept normal expenses and hospitality associated with your duties as a councillor. If you are unsure, do contact your Monitoring Officer for guidance.

Appendix One – The Seven Principles of Public Life

The principles are:

Selflessness

Holders of public office should act solely in terms of the public interest.

Integrity

Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must disclose and resolve any interests and relationships.

Objectivity

Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

Accountability

Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.

Openness

Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.

Honesty

Holders of public office should be truthful.

Leadership Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

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Appendix Two - Registering interests

Within 28 days of becoming a member or your re-election or re-appointment to office you must register with the Monitoring Officer the interests which fall within the categories set out in Table 1 (Disclosable Pecuniary Interests) which are as described in "The Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012". You should also register details of your other personal interests which fall within the categories set out in Table 2 (Other Registerable Interests).

"Disclosable Pecuniary Interest" means an interest of yourself, or of your partner if you are aware of your partner's interest, within the descriptions set out in Table 1 below.

"Partner" means a spouse or civil partner, or a person with whom you are living as husband or wife, or a person with whom you are living as if you are civil partners.

1. You must ensure that your register of interests is kept up-to-date and within 28 days of becoming aware of any new interest, or of any change to a registered interest, notify the Monitoring Officer.
2. A 'sensitive interest' is as an interest which, if disclosed, could lead to the councillor, or a person connected with the councillor, being subject to violence or intimidation.
3. Where you have a 'sensitive interest' you must notify the Monitoring Officer with the reasons why you believe it is a sensitive interest. If the Monitoring Officer agrees they will withhold the interest from the public register.

Non participation in case of disclosable pecuniary interest

4. Where a matter arises at a meeting which directly relates to one of your Disclosable Pecuniary Interests as set out in Table 1, you must disclose the interest, not participate in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation. If it is a 'sensitive interest', you do not have to disclose the nature of the interest, just that you have an interest. Dispensation may be granted in limited circumstances, to enable you to participate and vote on a matter in which you have a disclosable pecuniary interest.
5. [Where you have a disclosable pecuniary interest on a matter to be considered or is being considered by you as a Cabinet member in exercise of your executive function, you must notify the Monitoring Officer of the interest and must not take any steps or further steps in the matter apart from arranging for someone else to deal with it]

Disclosure of Other Registerable Interests

6. Where a matter arises at a meeting which directly relates to the financial interest or wellbeing of one of your Other Registerable Interests (as set out in Table 2), you must disclose the interest. You may speak on the matter only if members of the public are also allowed to speak at the meeting but otherwise must not take part in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation. If it is a 'sensitive interest', you do not have to disclose the nature of the interest.

Disclosure of Non-Registerable Interests

7. Where a matter arises at a meeting which directly relates to your financial interest or well-being (and is not a Disclosable Pecuniary Interest set out in Table 1) or a financial interest or well-being of a relative or close associate, you must disclose the interest. You may speak on the matter only if members of the public are also allowed to speak at the meeting. Otherwise you must not take part in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation. If it is a 'sensitive interest', you do not have to disclose the nature of the interest.
8. Where a matter arises at a meeting which affects –
 - a. your own financial interest or well-being;
 - b. a financial interest or well-being of a relative or close associate; or
 - c. a financial interest or wellbeing of a body included under Other Registrable Interests as set out in Table 2

you must disclose the interest. In order to determine whether you can remain in the meeting after disclosing your interest the following test should be applied

9. Where a matter (referred to in paragraph 8 above) affects the financial interest or well-being:
 - a. to a greater extent than it affects the financial interests of the majority of inhabitants of the ward affected by the decision and;
 - b. a reasonable member of the public knowing all the facts would believe that it would affect your view of the wider public interest

You may speak on the matter only if members of the public are also allowed to speak at the meeting. Otherwise you must not take part in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation.

If it is a 'sensitive interest', you do not have to disclose the nature of the interest.

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10. [Where you have an Other Registerable Interest or Non-Registerable Interest on a matter to be considered or is being considered by you as a Cabinet member in exercise of your executive function, you must notify the Monitoring Officer of the interest and must not take any steps or further steps in the matter apart from arranging for someone else to deal with it]

Table 1: Disclosable Pecuniary Interests This table sets out the explanation of Disclosable Pecuniary Interests as set out in the Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012.

| Subject | Description |
|---|--|
| Employment, office, trade, profession or vocation | Any employment, office, trade, profession or vocation carried on for profit or gain. |
| Sponsorship | Any payment or provision of any other financial benefit (other than from the council) made to the councillor during the previous 12-month period for expenses incurred by him/her in carrying out his/her duties as a councillor, or towards his/her election expenses. This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992. |
| Contracts | Any contract made between the councillor or his/her spouse or civil partner or the person with whom the Subject Description Employment, office, trade, profession or vocation Page 13 of 16 Approved 3rd 12.2020 Updated 19 January and 17 May 2021 councillor is living as if they were spouses/civil partners (or a firm in which such person is a partner, or an incorporated body of which such person is a director* or a body that such person has a beneficial interest in the securities of*) and the council — (a) under which goods or services are to be provided or works are to be executed; and (b) which has not been fully discharged. |
| Land and Property | Any beneficial interest in land which is within the area of the council. 'Land' excludes an easement, servitude, |

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| | |
|---------------------|--|
| | interest or right in or over land which does not give the councillor or his/her spouse or civil partner or the person with whom the councillor is living as if they were spouses/ civil partners (alone or jointly with another) a right to occupy or to receive income. |
| Licenses | Any licence (alone or jointly with others) to occupy land in the area of the council for a month or longer. |
| Corporate tenancies | Any tenancy where (to the councillor's knowledge)— (a) the landlord is the council; and (b) the tenant is a body that the councillor, or his/her spouse or civil partner or the person with whom the councillor is living as if they were spouses/ civil partners is a partner of or a director* of or has a beneficial interest in the securities* of. |
| Securities | Any beneficial interest in securities* of a body where— (a) that body (to the councillor's knowledge) has a place of business or land in the area of the council; and (b) either— (i)) the total nominal value of the securities* exceeds £25,000 or one hundredth of the total issued share capital of that body; or (ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the councillor, or his/ her spouse or civil partner or the person with whom the councillor is living as if they were spouses/civil partners have a beneficial interest exceeds one hundredth of the total issues share capital of that class. |

* 'director' includes a member of the committee of management of an industrial and provident society.

* 'securities' means shares, debentures, debenture stock, loan stock, bonds, units of a collective investment scheme within the meaning of the Financial Services and Markets Act 2000 and other securities of any description, other than money deposited with a building society.

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Table 2: Other Registrable Interests

You must register as an Other Registerable Interest:

- a) any unpaid directorships
- b) any body of which you are a member or are in a position of general control or management and to which you are nominated or appointed by your authority
- c) any body
 - (i) exercising functions of a public nature (ii) directed to charitable purposes or (iii) one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union) of which you are a member or in a position of general control or management

Appendix Three - Core Code of Ethics Principles are:

Putting our communities first

We put the interests of the public, the community, and service users first.

Integrity

We act with integrity including being open, honest, and consistent in everything that we do.

Dignity and respect

We treat people with dignity and respect, making decisions objectively based on evidence, without discrimination or bias.

Leadership

We are all positive role models, always demonstrating flexible and resilient leadership.

We are all accountable for everything we do and challenge all behaviour that falls short of the highest standards.

Equality, diversity and inclusion (EDI)

We continually recognise and promote the value of EDI, within RBFA, Royal Berkshire Fire and Rescue Service and the wider communities in which we serve.

We stand against all forms of discrimination, create equal opportunities, promote equality, foster good relations, and celebrate difference.

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Appendix Four – the Committee on Standards in Public Life

The LGA has undertaken this review whilst the Government continues to consider the recommendations made by the Committee on Standards in Public Life in their report on Local Government Ethical Standards. If the Government chooses to implement any of the recommendations, this could require a change to this Code.

The recommendations cover:

- Recommendations for changes to the Localism Act 2011 to clarify in law when the Code of Conduct applies
- The introduction of sanctions
- An appeals process through the Local Government Ombudsman
- Changes to the Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012
- Updates to the Local Government Transparency Code
- Changes to the role and responsibilities of the Independent Person
- That the criminal offences in the Localism Act 2011 relating to Disclosable Pecuniary Interests should be abolished

The Local Government Ethical Standards report also includes Best Practice recommendations. These are:

Best practice 1: Local authorities should include prohibitions on bullying and harassment in codes of conduct. These should include a definition of bullying and harassment, supplemented with a list of examples of the sort of behaviour covered by such a definition.

Best practice 2: Councils should include provisions in their code of conduct requiring councillors to comply with any formal standards investigation and prohibiting trivial or malicious allegations by councillors.

Best practice 3: Principal authorities should review their code of conduct each year and regularly seek, where possible, the views of the public, community organisations and neighbouring authorities.

Best practice 4: An authority's code should be readily accessible to both councillors and the public, in a prominent position on a council's website and available in council premises.

Best practice 5: Local authorities should update their gifts and hospitality register at least once per quarter, and publish it in an accessible format, such as CSV.

Best practice 6: Councils should publish a clear and straightforward public interest test against which allegations are filtered.

Best practice 7: Local authorities should have access to at least two Independent Persons.

Best practice 8: An Independent Person should be consulted as to whether to undertake a formal investigation on an allegation, and should be given the option to review and comment on allegations which the responsible officer is minded to dismiss as being without merit, vexatious, or trivial.

Best practice 9: Where a local authority makes a decision on an allegation of misconduct following a formal investigation, a decision notice should be published as soon as possible on its website, including a brief statement of facts, the provisions of the code engaged by the allegations, the view of the Independent Person, the reasoning of the decision-maker, and any sanction applied.

Best practice 10: A local authority should have straightforward and accessible guidance on its website on how to make a complaint under the code of conduct, the process for handling complaints, and estimated timescales for investigations and outcomes.

Best practice 11: Formal standards complaints about the conduct of a parish councillor towards a clerk should be made by the chair or by the parish council, rather than the clerk in all but exceptional circumstances.

Best practice 12: Monitoring Officers' roles should include providing advice, support and management of investigations and adjudications on alleged breaches to parish councils within the remit of the principal authority. They should be provided with adequate training, corporate support and resources to undertake this work.

Best practice 13: A local authority should have procedures in place to address any conflicts of interest when undertaking a standards investigation. Possible steps should include asking the Monitoring Officer from a different authority to undertake the investigation.

Best practice 14: Councils should report on separate bodies they have set up or which they own as part of their annual governance statement and give a full picture of their relationship with those bodies. Separate bodies created by local authorities should abide by the Nolan principle of openness and publish their board agendas and minutes and annual reports in an accessible place.

Best practice 15: Senior officers should meet regularly with political group leaders or group whips to discuss standards issues.

The LGA has committed to reviewing the Code on an annual basis to ensure it is still fit for purpose.

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ROYAL BERKSHIRE FIRE AUTHORITY REPORT

| | |
|---------------------------|---|
| COMMITTEE | AUDIT AND GOVERNANCE |
| DATE OF MEETING | 24 JANUARY 2022 |
| SUBJECT | GRIEVANCE, BULLYING AND HARASSMENT POLICY; ANTI-FRAUD, BRIBERY AND CORRUPTION POLICY; EMPLOYEE CODE OF CONDUCT; BEHAVIOURAL COMPETENCY FRAMEWORK |
| LEAD OFFICER | BECCI JEFFERIES, HEAD OF HR AND LEARNING AND DEVELOPMENT |
| LEAD MEMBER | N/A |
| EXEMPT INFORMATION | NONE |
| ACTION | DECISION |

1. EXECUTIVE SUMMARY

- 1.1 The Audit and Governance Committee's Terms of Reference require the Committee to approve and monitor the effectiveness and outcomes relating to a number of the Authority's policies including:
- Grievance, Bullying and Harassment Policy
 - Anti-Fraud, Bribery and Corruption Policy
- 1.2 A review of the policies outlined above has been undertaken and they are presented for approval and consideration by the Committee.
- 1.3 The Employee Code of Conduct and Behavioural Competency Framework has been updated to ensure alignment with the national Core Code of Ethics for Fire and Rescue Services (published May 2021). These documents are attached for information.

2. RECOMMENDATION

That the Audit and Governance Committee:

- 2.1 **Approve** the revised policies listed below, subject to any further amendments the Committee may wish to make
- Grievance, Bullying and Harassment Policy
 - Anti-Fraud, Bribery and Corruption Policy

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- 2.2 **Note** the changes to the Employee Code of Conduct and the Behavioural Competency Framework

3. REPORT

Employee Code of Conduct and Behavioural Competency Framework

- 3.1 A presentation was delivered to the Fire Authority by Deputy Chief Executive Nikki Richards on 17 February 2021, introducing the draft Core Code of Ethics for Fire and Rescue Services in England. The Core Code was published nationally in May 2021.
- 3.2 Work has been undertaken to align RBFRS' Employee Code of Conduct (Appendix C) and the Behavioural Competency Framework (Appendix D) with the national Core Code of Ethics. A gap analysis has also been undertaken to ensure that policies and processes throughout RBFRS align to the revised Employee Code of Conduct and Behavioural Competency Framework, including the policies appended to this report that require approval by the Audit and Governance Committee.
- 3.3 These policies are currently under consultation.

Grievance, Bullying and Harassment Policy

- 3.4 The Grievance, Bullying and Harassment Policy (Appendix A) has been updated to incorporate feedback from Stonewall to include further information on the definition of discrimination, an inclusion of a section on Dual Discrimination and further examples of inappropriate behaviour.
- 3.5 A more specific link to the Say-So employee complaints hotline has been included.
- 3.6 The Policy Statement has been re-worded to ensure closer alignment with the Employee Code of Conduct and Behavioural Competency Framework.
- 3.7 The policy has been added to the new policy template and an initial equality impact assessment has been undertaken.
- 3.8 The policy will be forwarded for formal consultation following approval from the Audit and Governance Committee.

Anti-Fraud, Bribery and Corruption Policy

- 3.9 The Anti-Fraud, Bribery and Corruption Policy (Appendix B) has been added to the new policy template, minor grammatical changes have been made and an initial equality impact assessment has been undertaken.
- 3.10 An additional reference has been made in the 'Supporting Information' section to the Employee Code of Conduct.
- 3.11 There are no substantive issues requiring further consultation.

4. CONTRIBUTION TO STRATEGIC COMMITMENTS

- 4.1 Commitment 4 – We will seek opportunities to contribute to a broader safety, health and wellbeing agenda, whilst delivering our core functions.
- 4.2 Commitment 5 – We will ensure that Royal Berkshire Fire and Rescue Service provides good value for money.

5. FINANCIAL IMPLICATIONS

- 5.1 There are no direct financial implications arising from this report.

6. LEGAL IMPLICATIONS

The policy and procedure to be reviewed contribute to the compliance with the following legislation:

- 6.1 Employment Rights Act 1996
- 6.2 Data Protection Act 2018
- 6.3 The Fraud Act 2006
- 6.4 The Bribery Act 2010
- 6.5 The Equality Act 2010

7. EQUALITY DIVERSITY AND INCLUSION IMPLICATIONS

- 7.1 These policies and procedures contribute to the RBFRS People Strategy specifically in respect of:
- Culture, one team working collaboratively for the people we serve
 - Clarity on the decision-making levels, accountability and processes without unnecessary hierarchy
 - A focus on excellent communication of key messages in an open way using a wide range of engagement methods
 - Developing an internal customer service culture – making processes easy to use for people.
- 7.2 An initial Equality Impact Assessment has been carried out in respect of each of these policies.

8. RISK IMPLICATIONS

- 8.1 There are no significant risk management issues arising from this report.

9. CONSISTENCY WITH DUTY TO COLLABORATE

- 9.1 N/A

10. PRINCIPAL CONSULTATION

- 10.1 Monitoring Officer
- 10.2 Head of Finance and Procurement

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- 10.3 Chief Fire Officer
- 10.4 These policies have been subject to consultation with Representative Bodies and staff

11. BACKGROUND PAPERS

- 11.1 Minutes of the meeting of the Royal Berkshire Fire Authority 17 February 2021

12. APPENDICES

- 12.2 Appendix A – Grievance, Bullying and Harassment Policy
- 12.3 Appendix B – Anti-Fraud, Bribery and Corruption Policy
- 12.4 Appendix C – Employee Code of Conduct
- 12.5 Appendix D – Behavioural Competency Framework

13. CONTACT DETAILS

- 13.1 Becci Jefferies
Head of Human Resources and Learning and Development
0118 9384670



RBFRS Policy Document

| Policy Information | Details |
|---------------------------|--|
| Policy Name | Grievance, Bullying and Harassment Policy |
| Author | HR Adviser |
| Owner | Head of HR and L&D |
| Protective Marking | Official |
| Version | |
| Status | Contractual Minor change only – no formal consultation required |
| Issue Date | |
| Review Date | 2 Years from issue date |

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Appendix A

| | |
|-------------------------------|---|
| Policy Statement | <p>Royal Berkshire Fire and Rescue Service (RBFRS) values and celebrates diversity and believes that everybody should be treated with dignity and respect without the fear of discrimination, harassment or bullying. Employees are expected to model positive behaviours by treating everyone with dignity and respect and recognising and challenging inappropriate behaviours.</p> <p>RBFRS has a zero tolerance approach to all forms of discrimination and expects that everybody will report any incident of bullying, harassment, discrimination and victimisation either towards themselves or others immediately.</p> <p>All incidents of any inappropriate or unacceptable behaviour will be challenged, investigated and suitable action will be taken. The confidentiality of all those involved will be maintained wherever possible. All individuals can trust that their concerns, problems or complaints will be dealt with sensitively and fairly and be resolved as soon as possible.</p> <p>If an employee has concerns they feel cannot be raised through this policy, these can be raised through RBFRS' external 'Say So' hotline or if it is more appropriate to do so, via the Whistleblowing policy.</p> |
| Purpose | <p>The policy sets out the process individuals can follow should they have a complaint regarding their own or another's treatment in the workplace. It lays down actions which need to be taken and the appropriate timescales.</p> |
| Scope | <p>This policy applies to all employees of RBFRS, and voluntary representatives of RBFRS.</p> |
| Supporting Information | <p>Management Tools</p> <ul style="list-style-type: none"> - Mediation Process - Managers Guide to Investigating Complaints <p>Equality, Diversity and Inclusion Policy</p> <p>Whistleblowing Policy</p> <p>Trans Equality Policy</p> <p>Employee Code of Conduct</p> <p>Behavioural Competency Framework</p> |

| Revision History | | | |
|-------------------------|-------------|--------|------|
| Revision | Description | Author | Date |
| | | | |

| Revision History | | | |
|-------------------------|--|------------|------------|
| | | | |
| v8 | Added to new policy template, general review and removal of repetition | HR Adviser | 09/04/2021 |
| v9 | Inclusion of information on dual discrimination and expansion of specific examples of inappropriate behaviour. | HR Adviser | 17/08/2021 |

| Authorisation | |
|---|-----------------|
| Approving SLT Member | Becci Jefferies |
| Approving Director (If Required) | Nikki Richards |

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Policy Detail

Definitions

Grievance

Grievances are issues employees may have with their work, working environment or terms and conditions of employment.

Note - Collective grievances by a group of staff (or made on behalf of a group of staff by their representative body) fall outside the scope of this policy and are dealt with between management and the Trade Union and/or employee representatives.

Bullying

Workplace bullying is when someone persistently mistreats you in a way that causes you either physical or emotional harm. It can include verbal, non-verbal, psychological, physical abuse and humiliation.

Harassment

Harassment is when someone behaves in a way which offends you or makes you feel distressed or intimidated. This could be abusive comments or jokes, graffiti or insulting gestures.

Discrimination

Discrimination is when you are treated unfairly because of who you are, because you possess certain characteristics, because you are perceived as holding a certain characteristic or if you are a friend or family member who holds a certain characteristic. Under the Equality Act 2010 these characteristics include age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.

Dual Discrimination

Dual discrimination is when you are treated less favourably because of a combination of two protected characteristics (for example a homosexual woman).

Victimisation

Victimisation refers to unfair treatment directed towards you, if you have made or if people think you have made or supported a complaint under discrimination law. It includes situations where a complaint hasn't yet been made but you are being badly treated because it is suspected that you might make one.

Specific Examples of Inappropriate Behaviour

The following are examples of inappropriate behaviour (note, this list is not exhaustive).

- Bullying and/or harassment based on a particular characteristic or protected characteristic
- Using stigmatising language or behaviours
- Verbal or physical assault offensive language or comments toward you or others
- Offensive or insulting jokes, banter, gibes, insinuations and graffiti

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- Displaying offensive materials including the contents of internet sites
- 'Virtual' harassment remotely over remote video meetings/workplace chat forums
- Inappropriate comments, pictures or videos on public internet 'chat site' or social networking sites
- Persistent intrusive questions about your private life or marital status, sexual interests or orientation, ethnic origin, culture or religion
- Unnecessary references to sexual orientation or gender identity
- Attempts to impose religious or political beliefs on you or other people
- Encouraging others to behave in a way which is discriminatory
- Ridicule or behaviour which demeans you or others
- Someone mimics you or others or mimics a stereotypical view of a particular group of people
- Unwelcome sexual advances
- Unwelcome physical contact
- Someone spreading rumours or insults, including by communications such as email or copying communications that are critical about someone to others who do not need to know and 'outing' someone without their permission
- Aggression, including swearing, shouting and verbal abuse
- Exclusion of individuals from discussions or decision making
- Not providing individuals the training or information you need to do your job
- Refusing employees time off for religious purposes despite them giving sufficient notice of their requirements
- Isolating employees from other members of the team

Employee Complaints Procedure

Any grievances or complaints should ideally be dealt with informally in the first instance, however if the complaint is of a serious nature or cannot be resolved informally a formal complaint may be immediately made. If an employee has concerns they feel cannot be raised through this policy, these can be raised through RBFRS' external 'Say So' hotline or if it is more appropriate to do so, via the Whistleblowing policy

Any grievance or complaint will be settled as near to its source as is possible and within the timescales detailed in Appendix 1. Wherever possible, those investigating the complaint will endeavour to meet the timescales prescribed in Appendix 1. However there may occasionally be times that issues beyond the control of the investigating officer will cause delays – where this is the case all parties will be advised. Investigations will be considered a priority in order to facilitate a prompt solution for the benefit of all parties.

Raising a Complaint

If employees wish to raise a complaint, the three stage process detailed below should be followed.

Where possible, you should raise complaints informally with your line manager. If you do not feel comfortable speaking to your line manager, speak to another manager or raise the issue with the HR department, who will advise you what you should do. You should raise the complaint as soon as practicable, no later than one month from the date of the incident (or the latest incident if a series of incidents has occurred). Complaints will not be investigated more than three months after the alleged occurrence except in exceptional circumstances (for example long term sickness).

Unless individual circumstances make it difficult, or compliance with the law makes this impossible employee will remain in their current role and at their current workplace whilst the issues are resolved.

Stage 1 - Informal Complaint

Discuss the complaint or grievance with your line manager.

In order to monitor the nature of complaints within the organisation to support improvements in our service, we would encourage you to complete the [Informal Complaint Monitoring Form](#) . This anonymous form will be forwarded to HR on completion and will be logged and destroyed thereafter.

Your line manager will arrange to meet with you to discuss your complaint. Your Line Manager will use the investigation checklist on the reverse of the complaint monitoring form. Having heard your complaint your line manager will outline the actions to be taken and time frames.

Stage 2 - Formal Complaint

If you are unhappy with the outcome of your informal complaint or you feel that the complaint is more serious and warrants a more formal approach, you can make a formal complaint. In this case, you should submit your complaint in writing using the [Formal Complaints Reporting Form](#). Cases will normally be investigated by your Line Manager, however you have the right to request an Investigating Officer of the same gender for cases involving harassment of a sexual nature. In some cases, i.e. where the complaint concerns the Chief Fire Officer, the matter may be referred to the Fire Authority.

When the Investigating Officer has completed the investigation, you will be informed of the findings in an outcome letter. A meeting can be arranged if necessary.

Where situations raised by third parties are of a serious nature, RBFRRS may investigate the issue without receiving a formal complaint. The line manager should ensure that individuals are aware that the action being taken is a managerial decision.

If you are the subject of a complaint you will be notified in writing and will be given the opportunity to respond to the issues raised.

Stage 3 – Appeal

If you remain dissatisfied with the decision at the formal level you may appeal as outlined below.

The right of appeal applies to both the person raising the complaint under the Grievance, Bullying and Harassment Policy and those against whom allegations have been brought.

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The name of the person to whom you should appeal will be made clear in your outcome letter. You should put your appeal in writing, stating the grounds for the appeal, no later than seven days after you have been informed of the outcome of your complaint.

Your appeal will be heard by a higher level of management than those that investigated the complaint as detailed below:

| Level of Initial Investigator | Minimum Level of those hearing the Appeal |
|--------------------------------------|--|
| Watch Manager / Team Leader | Station Manager / Department Manager |
| Station Manager | Group Manager A / Department Manager |
| Group Manager A | Group Manager B / Head of Service |
| Group Manager B / Department Manager | Area Manager / Head of Service |
| Area Manager / Head of Service | Deputy Chief Fire Officer / Director |
| Deputy Chief Fire Officer / Director | Chief Fire Officer |
| Chief Fire Officer | Fire Authority |

The grounds for appeal are:

- The laid down procedure was not followed correctly.
- The issue was not proved on the balance of probabilities
- The actions identified by the Investigating Officer were too severe or not appropriate
- New evidence has come to light since the hearing, which will have an impact on the original decision

Managers hearing appeals will be accompanied where possible by an alternative HR representative to that which advised the original Investigating Officer.

General Issues

Disciplinary Issues

If the Complaint leads to a disciplinary issue, the complaint will be suspended pending the disciplinary outcome. When this has been completed, you will receive an outcome letter from the investigating officer which will outline the findings. A meeting can be arranged if necessary.

You will not be informed of the specific details in relation to any third party disciplinary or management action nor actions personal to an individual such as additional training or development. You may however be called as a witness to any subsequent investigations or hearings as necessary.

Confidentiality and Anonymity

All parties should maintain confidentiality as far as possible given the scope and nature of the investigation.

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In bullying or harassment cases you may ask to remain anonymous. However, in practice this is often difficult as all parties involved should be given a fair opportunity to put their case and this may include being given details of your identity and the allegations made by you. If we need to disclose your details and you have asked for anonymity, you will be consulted beforehand and supported throughout the process. If disciplinary action results from the complaint it will be necessary for your identity to be disclosed.

On rare occasions, the matter raised may be so serious that you or someone else is at serious risk, or the act constitutes a breach of legislation. In such cases RBFRS may be obliged to take action despite your wishes. This may include disclosing the information to the police or other statutory or governmental bodies. In this case you will be supported throughout the process.

Allegations raised by the public against an employee or employees are outside of this procedure. Where a complaint or an allegation of bullying and/or discrimination comes from a member of the public, a complaints form must be completed. The complaint will be fully investigated and appropriate procedures and policies implemented depending on the outcome. If a disciplinary investigation is appropriate the evidence gathered in the complaint investigation will be used as evidence for the investigation.

If you raise a complaint once you have left the organisation it will be treated as an external complaint.

Malicious / Frivolous Complaints

RBFRS believe that all complaints of inappropriate behaviour should be taken seriously and fully investigated, however in some very rare cases complaints may be brought maliciously. Where the Investigating Officer has a belief that this is the case, they will consult HR before a decision is made. The decision to not progress the complaint will only be made if there is clear evidence to support the allegation of malicious or frivolous intention. If there is any uncertainty a full investigation will be carried out. Complaints that are found to be malicious may potentially lead to disciplinary action.

Access to Investigation Reports

You are not entitled to receive a copy of the full final report and any witness statements in their entirety as they may contain personal data, but the Investigating Officer may agree to release part or all of the report where this does not compromise the confidentiality of other people. Details of any disciplinary action arising from the case are considered to be confidential and therefore cannot be made available to you. You will, however, be informed in the outcome letter that your complaint has been upheld or overturned and, in broad terms, the action to be taken.

Sources of Support

In addition to the support provided through this policy, employees are reminded of the additional sources of support available through the Employee Assistance Programme (details are available on Siren), Trade Unions and the Blue Light Champions.

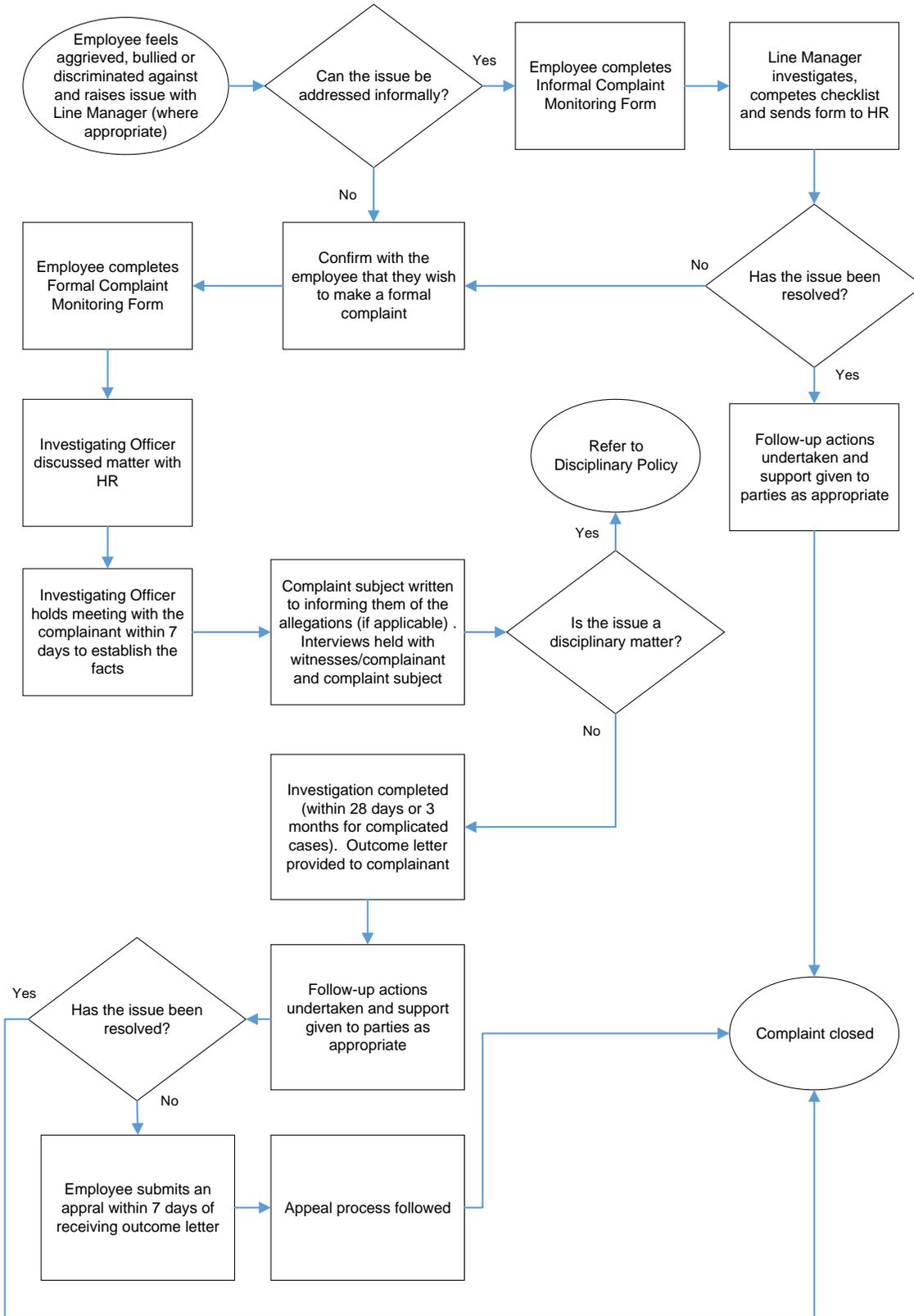
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Appendix A

Review

This policy will be reviewed within 2 years of its publication date or when required by a change in circumstances.

Appendix 1 – Employee Complaints Process



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Appendix A

Initial Equality Impact Assessment

Please complete the below if making significant revisions or this is a new policy.

| | |
|--|---|
| Name and Role of Person Completing Assessment: Lucy Greenway | Date of Assessment: 10/11/2021 |
| 1. Who is intended to benefit from this policy/service, and in what way? | This policy outlines the behaviours expected from employees and provides examples of unacceptable behaviour. It outlines the process for dealing with employee complaints, which ensures all complaints are dealt with effectively, fairly and consistently. It also ensures all individuals understand the expected levels of conduct and behaviour. |
| 2. Who are the main stakeholders in relation to the policy/service? (e.g. applicants, service users, member of the public, RBFRS employees, partner organisations) | RBFRS employees and voluntary representatives |
| Please briefly describe any potential impacts (neutral, positive, negative) of the policy / revisions of the policy on the groups below: | |
| Sex (Men and Women) | Positive – this policy is designed to offer equality protection for all groups, and provides a process for any concerns or issues relating to discriminatory behaviour can be addressed effectively. |
| Race (All Racial Groups) | Positive – this policy is designed to offer equality protection for all groups, and provides a process for any concerns or issues relating to discriminatory behaviour can be addressed effectively. |
| Disability (Mental, Physical, and Carers of Disabled people) | Positive – this policy is designed to offer equality protection for all groups, and provides a process for any concerns or issues relating to discriminatory behaviour can be addressed effectively. |
| Religion or Belief | Positive – this policy is designed to offer equality protection for all groups, and provides a process for any concerns or issues relating to discriminatory behaviour can be addressed effectively. |

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| | |
|--|--|
| Sexual Orientation (All diverse sexual orientations) | Positive – this policy is designed to offer equality protection for all groups, and provides a process for any concerns or issues relating to discriminatory behaviour can be addressed effectively. |
| Pregnancy and Maternity (Includes new mothers and those returning to the workplace) | Positive – this policy is designed to offer equality protection for all groups, and provides a process for any concerns or issues relating to discriminatory behaviour can be addressed effectively. |
| Marital Status (Married and Civil Partnerships) | Positive – this policy is designed to offer equality protection for all groups, and provides a process for any concerns or issues relating to discriminatory behaviour can be addressed effectively. |
| Trans People (Includes non-binary identities and all other diverse gender identities/expressions) | Positive – this policy is designed to offer equality protection for all groups, and provides a process for any concerns or issues relating to discriminatory behaviour can be addressed effectively. |
| Age (People of all ages) | Positive – this policy is designed to offer equality protection for all groups, and provides a process for any concerns or issues relating to discriminatory behaviour can be addressed effectively. |
| People in different family circumstances (including those with caring responsibilities) | Positive – this policy is designed to offer equality protection for all groups, and provides a process for any concerns or issues relating to discriminatory behaviour can be addressed effectively. |
| People in different social circumstances (including socio-economic factors i.e. poverty and isolation) | Positive – this policy is designed to offer equality protection for all groups, and provides a process for any concerns or issues relating to discriminatory behaviour can be addressed effectively. |
| Different employee groups (including consideration of on-call staff, grades, contract status. Also consider non-employee groups i.e. casual workers, volunteers) | Positive |

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| | |
|---|----------|
| Other – this may include consideration of other factors as relevant to the activity such as unemployment, homelessness, urbanisation, rurality, health inequalities | Positive |
| If any potential negative impacts have been identified you must complete a full Equality Impact Assessment (Form 280) before publication. | |



RBFRS Policy Document

| Policy Information | Details |
|---------------------------|--|
| Policy Name | Anti-Fraud, Bribery and Corruption Policy |
| Author | Head of Finance and Procurement Services |
| Owner | Head of Finance and Procurement Services |
| Protective Marking | Official |
| Version | |
| Status | Non-contractual Minor change only – no formal consultation required |
| Issue Date | |
| Review Date | |

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Appendix B

| | |
|--------------------------------------|---|
| <p>Policy Statement</p> | <p>Royal Berkshire Fire Authority is committed to the highest possible standards of integrity, openness and accountability. The Authority recognises that sound systems of public accountability are vital to effective management and to protecting the public funds entrusted to it.</p> <p>This Anti-Fraud, Bribery and Corruption Policy outlines the Authority's commitment to creating an anti-fraud culture and maintaining high ethical standards in its administration of public funds.</p> <p>In order to prevent, discourage and detect fraud, the Authority has in place, and will continue to develop appropriate controls and procedures. These are inter-related and are designed to frustrate fraud, bribery or corruption. They cover culture, prevention, detection and training.</p> |
| <p>Purpose</p> | <p>This policy aims to:</p> <ul style="list-style-type: none"> • avoid the consequences of fraud, bribery and corruption, which are costly, time consuming, threaten morale and ultimately damage the standing and reputation of the Service; • encourage confidence in raising concerns of fraud, bribery or corruption; • reassure employees that if they raise any concerns in good faith and reasonably believe them to be true, they will be protected from possible reprisals or victimisation; • provide an effective mechanism for members of the public to raise genuine and serious concerns. |
| <p>Scope</p> | <p>This Policy applies to all employees, whether temporary or permanent, consultants, contractors, agents, partner organisations, suppliers, and users of the Service</p> |
| <p>Supporting Information</p> | <p>The Fraud Act 2006 The Bribery Act 2010 Employee Code of Conduct</p> |

| Revision History | | | |
|------------------|---|---------|----------|
| Revision | Description | Author | Date |
| 3 | Added to new policy template and minor amendments | C Byrne | Dec 2021 |

| Authorisation | |
|---|----------------|
| Approving SLT Member | Conor Byrne |
| Approving Director (If Required) | Nikki Richards |

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Policy Description

The policy outlines the standards required by RBFRS and processes to be followed in the event of a breach.

Definitions

Fraud Act 2006

The Fraud Act 2006 defines three main types of fraud:

- **Fraud by false representation** – where an individual dishonestly and knowingly makes a representation that is untrue or misleading;
- **Fraud by wrongfully failing to disclose information** – where an individual wrongfully and dishonestly fails to disclose information to another person when they have a legal duty to disclose it;
- **Fraud by abuse of position** – where an individual secretly abuses their position of trust without the other person's knowledge.

Fraud may involve one or several people, whether from within or external to the Service.

Examples of fraud include:

- unlawfully obtaining money or property belonging to the Service, e.g. IT equipment;
- forgery;
- falsification of records for personal gain, e.g. timesheets and expenses;
- personal use of property belonging to the Authority;
- procurement of contracts for personal gain;
- creation of ghost employees;
- misuse of corporate procurement cards.

Bribery and Corruption

The Bribery Act 2010 came into force on 1st July 2011. The Act makes provision for offences relating to bribery and covers the following:

- paying bribes;
- receiving bribes;
- failure to prevent bribery;
- bribery of a foreign official.

Examples of Bribery include:

- Accepting gifts or hospitality of an inappropriate value for personal gain
- Accepting hospitality during a tender process
- Accepting cash or cash equivalents for personal gain
- Asking for gifts or hospitality for personal gain

Although this document refers to fraud, bribery and corruption, the principles can be applied to all financial malpractice. This includes a wide range of irregularities and criminal acts including theft of property and false accounting.

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Culture and Stance against Fraud, Bribery and Corruption

The Authority is determined that the culture and tone of the organisation is one of honesty and opposition to fraud and corruption along with high standards of conduct and values.

There is a further expectation and requirement that all individuals and organisations associated with the Authority will act with integrity and that Members and employees at all levels will lead by example in these matters.

The Authority's employees are an important element in its stance on fraud and corruption. They are positively encouraged and expected to raise any concerns that they may have on these issues, knowing that such concerns will be treated in confidence, properly investigated and dealt with fairly.

The Authority believes that the maintenance of a culture of honesty and openness is a key element in tackling fraud. Conduct for all Members, staff and workers is based on the following principles:

- Honesty
- Integrity
- Selflessness
- Objectivity
- Openness
- Accountability
- Leadership

Prevention

The Authority recognises that fraud, bribery and corruption are costly, both in terms of risk to reputation and financial losses. The prevention of fraud is therefore a key objective of the Service and respective roles and responsibilities are outlined below.

Employees of the Service

A key preventative measure is to take effective steps at the recruitment stage. Staff recruitment will be undertaken in accordance with the Authority's policies and procedures for recruitment and selection. Written references are obtained and where necessary a DBS check is completed to confirm all unspent convictions are declared, at the conditional offer stage.

The Authority understands that its employees are often the first line of defence in preventing fraud. Financial Regulations place responsibility for fraud prevention on all employees. Staff should therefore be alert to the possibility of fraud and should report any concerns.

The Service has in place disciplinary procedures for all staff. Those alleged to have committed any acts of impropriety will be dealt with in accordance with the [Disciplinary Policy](#) and in addition, where seemed appropriate, through the processes laid out in this policy.

Internal Control

The Authority has developed systems and procedures that incorporate effective and efficient internal controls. All employees are required to ensure that these controls are properly maintained. In particular, employees are responsible for the maintenance of controls within their own areas of

responsibility. In addition, employees should alert line managers where they believe the opportunity for fraud exists because of poor procedures or controls.

The Authority's internal and external auditors independently monitor compliance with the overall control environment and advise upon the continuing effectiveness and appropriateness of these controls.

The internal control environment includes physical controls and controls on process such as:

- dual authorisation of payments;
- restricted access to confidential information;
- appropriate procurement procedures that are based on cost, risk and legislation;
- restrictions on the authorisation of purchase orders;
- placing responsibility on line managers to scrutinise timesheets and expense submissions;
- separation of duties;
- ensuring physical security of Authority assets.

Combining with Others to Prevent and Fight Fraud

There are a variety of arrangements in place, which facilitate the regular exchanges of information between the Authority and other bodies for the purpose of preventing and detecting fraud. These involve national, regional and local networks of investigators such as internal and external auditors as well as the Authority's participation in the National Fraud Initiative.

Detection and Investigation

All of the Authority's control systems have been designed to deter and detect any fraudulent activity, but they can never provide a complete protection against fraud, bribery or corruption. It is often the alertness of employees and/or the public that detects fraud, bribery or corruption and enables appropriate remedial action to take place. Members, employees and workers must raise any concerns as soon as possible if fraud, bribery or corruption is suspected. (See [How to Report a Suspected Fraud](#)).

All allegations of fraud, bribery or corruption will be handled in line with the appropriate [Disciplinary Policy](#) and notified to HR Manager or a suitable deputy. The HR Manager will notify the Head of Finance and Procurement or their deputy who will decide whether the allegation is of so serious nature that they require the involvement of the Internal /External Auditors, Police and the chair of Audit and Governance as appropriate.

Assurances for Employees Making Disclosures under this Policy

An individual reporting a suspected fraud will not be at risk of losing their job or suffering any form of retribution as a result, provided that:

- the disclosure is made in good faith;
- there is a reasonable belief that the information disclosed, and any allegation contained in it, is substantially true.

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Anonymous Allegations of Suspected Fraud, Bribery or Corruption

The Authority encourages employees to disclose their names when reporting a suspected fraud. Concerns expressed anonymously are much less powerful, and are often more difficult to investigate or substantiate.

In considering whether to investigate anonymous allegations, particular consideration will be given to:

- the seriousness of the issues raised;
- the credibility of the concern;
- the likelihood of substantiation from other sources;
- the ability to discover the facts;
- the justification for maintaining anonymity.

Confidentiality

The Authority will treat all reports of suspected fraud in a confidential and sensitive manner. The identity of the individual reporting the fraud may be kept confidential provided this does not hinder or frustrate any investigation. However, there will be occasions where the identity of the individual needs to be revealed. For example, where the individual is required to give a witness statement during an investigation or give evidence at a formal hearing, where allegations of misconduct or criminal activity are involved.

Serious fraud will be referred to the Police for criminal investigation.

How to Report a Suspected Fraud

Concerns should initially be raised within the line management chain.

Alternatively, concerns can be raised directly with:

- The Chief Fire Officer
- The Head of Finance and Procurement
- The Authority's Monitoring Officer
- The Chairman of the Authority or the Chairman of the Audit & Governance Committee
- Via 'Say So' (see below)

This contact may be by telephone or face-to-face, but serious concerns are better raised in writing. The earlier the concern is expressed, the easier it is to take action.

Written allegations should include:

- all relevant background;
- the nature of the fraud and/or corruption that is alleged;
- relevant dates where possible;
- the names of individuals against whom the allegations are made; □ any supporting evidence, including documentation.
- reasonable grounds must be provided (proof beyond reasonable doubt is not required)

Should an employee feel unable to raise a workplace concern through the internal procedures, concerns can be raised through 'Say So', which is an organisation engaged by RBFPS to enable staff

to confidentially report workplace concerns. Say-So will facilitate employees raising workplace concerns and provides employees with an additional means of reporting a suspected case of fraud, bribery or corruption.

Raising Concerns Externally

You are encouraged to raise any concerns internally. However, in certain circumstances the Public Interest Disclosure Act 1998 provides protection to employees who make certain disclosures outside the Authority.

In brief, an employee may consider this route, for example, when they have a justifiable concern that their disclosure would not be dealt with properly by the Authority, or that the Authority may be constrained in its statutory powers to address the concern adequately. The protection relates to financial malpractice, impropriety or fraud.

Internal Audit (RSM) External Audit (Ernst & Young) are the most likely body to be considered in instances of fraud, bribery, corruption and misuse/abuse of public funds or powers.

Any employee who is considering making an external disclosure is encouraged to take advice to ensure that the disclosure falls within the provisions of the legislation, and that all internal avenues have been fully explored. If an employee does decide to take the matter outside the Authority, they should ensure they do not disclose any confidential information.

Matters to Consider Before Acting

Do

- make an immediate note of concerns; noting any documentary evidence which may exist.
- think about the risks and outcomes before acting.
- follow the guidance provided and contact the appropriate officer.
- deal with the matter promptly if concerns are warranted.

Don't

- ignore the issue.
- be afraid to raise concerns.
- approach or accuse any individuals directly.
- try to investigate the matter.
- use the Anti-Fraud, Bribery and Corruption Policy to pursue a personal grievance.

Who can provide support or advice?

Support and advice can be sought from the following bodies:

- A trade union representative
- EAP
- Occupational Health
- Service Chaplaincy
- Line Manager
- HR

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Review

This policy will be reviewed within 2 years of its publication date or when required by a change in circumstances.

Initial Equality Impact Assessment

Please complete the below if making significant revisions or this is a new policy.

| | | |
|--|---|--|
| Name and Role of Person Completing Assessment: Lucy Greenway | | Date of Assessment: 10/12/2021 |
| 1. Who is intended to benefit from this policy/service, and in what way? | This policy will benefit employees, service users and members of the public by outlining the Authority's commitment to creating an anti-fraud culture and maintaining high ethical standards in its administration of public funds. | |
| 2. Who are the main stakeholders in relation to the policy/service? (e.g. applicants, service users, member of the public, RBFRS employees, partner organisations) | RBFRS employees, service users, members of the public | |
| Please briefly describe any potential impacts (neutral, positive, negative) of the policy / revisions of the policy on the groups below: | | |
| Sex (Men and Women) | Neutral | |
| Race (All Racial Groups) | Neutral | |
| Disability (Mental, Physical, and Carers of Disabled people) | Neutral | |
| Religion or Belief | Neutral | |
| Sexual Orientation (All diverse sexual orientations) | Neutral | |
| Pregnancy and Maternity (Includes new mothers and those returning to the workplace) | Neutral | |
| Marital Status (Married and Civil Partnerships) | Neutral | |
| Trans People (Includes non-binary identities and all other diverse gender identities/expressions) | Neutral | |
| Age (People of all ages) | Neutral | |
| People in different family circumstances (including those with caring responsibilities) | Neutral | |

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| | |
|---|---------|
| People in different social circumstances (including socio-economic factors i.e. poverty and isolation) | Neutral |
| Different employee groups (including consideration of on-call staff, grades, contract status. Also consider non-employee groups i.e. casual workers, volunteers) | Neutral |
| Other – this may include consideration of other factors as relevant to the activity such as unemployment, homelessness, urbanisation, rurality, health inequalities | Neutral |
| If any potential negative impacts have been identified you must complete a full Equality Impact Assessment (Form 280) before publication. | |

Employee Code of Conduct



f RoyalBerksFRS **t** @RBFRSOfficial **@** RoyalBerkshireFire
in Royal Berkshire Fire & Rescue Service www.rbfrs.co.uk

Introduction

Every employee is expected to behave in a professional manner and to offer the highest standards of service to the public. The way you carry out your duties must promote and maintain public confidence and trust in Royal Berkshire Fire and Rescue Service (RBFRS).

This Employee Code of Conduct provides a framework for your behaviour, decisions and actions as an employee of RBFRS. It is based on the national Core Code of Ethics for Fire and Rescue Services in England which has been developed by the National Fire Chiefs Council, Local Government Association and the Association of Police and Crime Commissioners to support a consistent approach to ethics and behaviours across Fire Services in England.

It is not an exhaustive list of what you can and cannot do, but aims to help every member of our Service understand how to act in the right way in our service, to the public and towards each other. It is linked to the Behavioural Competency Framework which describes how the Employee Code of Conduct translates into expected behaviour.

The Code of Conduct is supported by a number of policies which are highlighted through this document.

If at any time you are unsure about the 'right thing to do', you can:

- refer to this Code of Conduct and/or any policies, procedures, guidance or local rules and requirements that apply to your job
- discuss the situation with your manager
- contact Human Resources
- consult the Duty Officer (out of hours)

This Code forms part of your contract of employment and you must comply with it. Failure to do so may result in disciplinary action, which could result in dismissal. It is your responsibility to read this code and work in accordance with it. This Code applies to all employees and anyone engaged by Royal Berkshire Fire and Rescue Service.

Fire Authority Members have their own Code of Conduct as laid out in the Fire Authority Members Handbook.

Seven Guiding Principles of Conduct in RBFRS

There are seven guiding principles that should be upheld by all staff, these are summarised below and the described in more detail later in the document.

1. **Putting our Communities First** – we put the interests of the public, the community and services users first.
2. **Integrity** – you should act with integrity and be open, honest and consistent in everything that we do.
3. **Dignity and Respect** – we treat people with dignity and respect, making decisions objectively based on evidence without discrimination or bias. We continually recognise and promote the value of equality, diversity and inclusion, both within the Service and the wider communities in which we serve. We stand against all forms of discrimination, create equal opportunities, promote equality, foster good relations and celebrate difference
4. **Accountability** – you are accountable for your behaviour, decisions and actions and challenge behaviour that falls short of the highest of standards. You must use any funds entrusted to you in a responsible and lawful way that ensures value for money for the local communities we serve, and always act in accordance with financial and procurement rules.
5. **Representing RBFRS** – present yourself at all times in a way that brings credit to the Service. Never speak to the press or publish articles about the Service without express permission.
6. **Leadership** – we are all positive role models, always demonstrating flexible and resilient leadership. We are all accountable for our behaviour, decisions and actions, and challenge all behaviour that falls short of the highest standards.
7. **Political neutrality** – you must be politically neutral and unbiased at all times when at work. Our Members have been elected by local people to represent them. You must respect their position irrespective of the parties they represent or your own views.

1. Putting our Communities First

We are here to serve the public and put the interests of the community and service users first. You are expected to offer the highest standards of service to the public at all times and consider if working in collaboration with others will be beneficial.

The public have a right to the services we provide. Always strive to be the best public servant you can be. Treat members of the public with dignity and respect.

You must promote the Service's aims for equality and inclusion and where appropriate for your role. Consider the diverse needs of the community in your work and tailor your work to best meet their specific needs.

Be honest, impartial and independent at work, regardless of your personal views on a matter. If your personal views conflict with the performance of your official duties and you believe that you cannot act impartially, you must contact your line manager

2. Integrity

You should act with integrity and be open, honest and consistent in everything that you do. Never place yourself in a position where your honesty and integrity may be questioned and avoid conflicts of interest between your private interests and your public duties.

Make all decisions objectively and without bias, fairly, consistently and on merit. This includes when making appointments, awarding contracts, or recommending individuals for rewards, benefits or opportunities and ensure that they are recorded appropriately.

Never use your position or authority to seek to improperly influence a decision or action or for your own personal gain, and be open, honest and fair in dealing with everyone.

You must avoid conflicts of interests between your private interests and your professional duties.

Accepting gifts and hospitality is not normally acceptable. We prohibit the giving or receiving of any gifts or hospitality that are excessive or improper.

However, a proportionate approach should be taken to gifts or hospitality if the item or gift is small or is of a marketing nature with branded advertising e.g. diaries, calendars, pens or boxes of chocolates, given spontaneously by individual members of the public to show their appreciation for the service given. It is also acceptable to accept paid-for lunches or other meals while carrying out RBFRRS business, and the scale of the meal is modest.

Any gift or hospitality offered or accepted must be declared and recorded in the Gifts and Hospitality Register.

Always work in accordance with the Service's policies regarding:

- [Anti-Fraud, Bribery and Corruption Policy](#)
- [Outside Employment/Work Policy](#)
- [Drug and Alcohol Policy](#)
- [Criminal and Traffic Offenses Policy](#)
- [Drivers Rules – Hours and Working Time Policy](#)

3. Dignity and Respect

We work together collaboratively as one team, treating others with dignity and respect. You should promote equality by never discriminating against any person

and by treating members of the public, elected Members and colleagues with respect regardless of their race, age, religion, gender, sexual orientation or disability or political affiliation. While you may have personal views that are not those of RBFRS, you must ensure that these are not expressed in a way that brings the Service into disrepute or adversely impacts on your ability to do your job. The Service will show zero tolerance for bullying or harassment.

You must treat the public, elected members and colleagues with dignity and respect. We are one team all working for the benefit of the public. You must never discriminate against, harass or victimise any person. There is zero tolerance for harassment and bullying in this Service. The Service's [Behavioural Competency Framework](#) describes the acceptable behaviours for the workplace.

You should carry out all reasonable instructions given by your manager but you must report to your manager anything that impairs your ability to do your job.

Managers will ensure that you understand what is required of you at work and fairly and objectively appraise your performance, promote the principles of fairness and equality in the workplace and recognise your need to balance your life at work and away from work.

Always work in accordance with the Service's Policies regarding:

- [Disciplinary Policy](#)
- [Grievance, Bullying and Harassment Policy](#)
- [Whistleblowing Policy](#)
- [Flexible Working Hours Policy](#)
- [Health and Wellbeing Action Plan](#)

You should promote equality by never discriminating against any person and by treating members of the public, elected Members and colleagues with respect regardless of their race, age, religion, gender, sexual orientation or disability or political affiliation. You behave in a way that celebrates diversity in all its forms and provide an environment where everyone has an equal voice.

You must promote the Service's aims for equality and inclusion and where appropriate for your role. Consider the diverse needs of the community in your work and tailor your work to best meet their specific needs.

4. Accountability

Always be at work and performing Service duties when you should be and in accordance with your contractual requirements. Agree in advance with your manager any leave requests, additional working, etc. Notify your manager if you are unable to attend work for any reason.

Never do private work when you should be at work for the Service or when you are on sick leave.

If you wish to carry out secondary employment you must get your manager's written approval before undertaking other employment. Any other employment must not conflict with the interests of the Service. The Service's time and/or resources may not be used for other employment.

Public funds entrusted to you must be used in accordance with the [Financial Regulations and Contract Standing Orders](#)

Never use the Service's facilities, property or equipment inappropriately; or waste, damage or lose it.

You must handle information, including personal and sensitive data, in accordance with the Information Governance, Security and Sharing Policies.

You have a responsibility for your own health and safety and that of members of the public or colleagues who may be affected by what you do.

You are accountable for maintaining your operational and/or professional competence required for your role.

Always work in accordance with the Services Policies regarding:

- [Outside Employment/Work Policy](#)
- [Drugs and Alcohol Policy](#)
- [Health and Safety Policy](#)
- [Acceptable use of IT Resources Policy](#)
- [Security Classification and Handling Policy](#)
- [Data Protection Policy](#)
- [Personal Data Breach Policy](#)
- [Sickness Absence and Attendance Policy](#)
- [Operational Competence Policy](#)
- [Anti-Fraud, Bribery and Corruption Policy](#)

5. Representing RBFRS

Never act in a way that could discredit the Service or bring it into disrepute – whether on duty or not.

All employees should be considerate of their appearance and dress appropriately. Where uniforms are provided, these must be worn in line with the [Work Wear Policy](#).

Any requests for information from journalists must be referred to the Communications Team. You must not publish articles or views in print or on the internet without express permission.

When expressing personal views you must not appear to speak for the Service e.g. by referring to your role in the service.

Always work in accordance with the Service's Policies regarding:

- [Social Media Policy](#)
- [Talking to the Media – A Guide for Staff](#)

6. Leadership

You should act as a positive role model and demonstrate flexible and resilient leadership.

You are accountable for your behaviour, decisions and actions and challenge behaviour that falls short of the highest standards. You must use any funds entrusted to you in a responsible and lawful way that ensures value for money for the local communities we serve, and always act in accordance with finance and procurement rules.

Managers should set a good example for employees through their promotion of these principles. In doing so managers will make sure employees know what is expected of them and fairly assess their performance, and provide employees with learning and development opportunities.

Managers are expected to treat all employees fairly and with dignity and respect.

Managers will consult and inform employees about change and on matters affecting the Service (in accordance with the Service's [Organisational Change Policy](#))

Employees can expect managers to clearly outline what is expected of them and provide regular feedback on how they are doing and provide employees with opportunities for training and development.

Managers have a duty of care to provide a safe and secure working environment.

7. Political Neutrality

In carrying out your work, you must be politically neutral. Your performance should be unbiased when carrying out your duties. You must not allow your personal and political views to interfere with your work.

Note: Courses are available on understanding and working with Fire Authority members.

Reporting breaches of the Code and Whistleblowing

We are committed the highest standards of public service. If you are concerned about any practice that you think conflicts with this Code, you should report these to your manager or Head of Service.

Alternatively you can report your concerns anonymously and confidentially using the Service's independent reporting line managed by Say-so.

You can contact Say-So, 24 hours a day and 7 days a week, on 0800 321 3546 or on-line at www.say-so.co.uk.

Further details can be found in our [Whistleblowing Policy](#)

Author: Nikki Richards – Deputy Chief Executive (ver.2 December 2021)

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Royal Berkshire Fire and Rescue Service Behavioural Competency Framework



RBFRS Behavioural Competency Framework

Why have a Behavioural Competency Framework?

A Behavioural Competency Framework (BCF) is a tool which allows organisations to easily identify the behaviours that drive successful performance and deliver an effective service.

The framework builds on the National Fire Chiefs Council Leadership Framework by adding additional behaviours as well as a section on Health Safety and Wellbeing. It is linked to the National Core Code of Ethics and our Employee Code of Conduct, by describing how these translate into the behaviour expected of our employees.

The BCF at Royal Berkshire Fire and Rescue Service (RBFRS) defines how, as a team, we can work together to ensure that we deliver an outstanding service to the communities we serve. To do this we need to make sure we all understand the organisations goals, can identify ways to improve and embrace change. The BCF also provides a clear link to our People Strategy by supporting staff to be the best public servant they can be through:

- increasing the emphasis on our responsibilities as a public servant
- developing and valuing our people
- driving personal leadership
- increasing diversity
- working in collaboration
- improving ways of working

What is the Behavioural Competency Framework?

The BCF outlines five core organisational behavioural competencies which are divided into four levels in the organisation based in the role an individual is performing. The four levels are Leading Self, Leading Others, Leading the Function and Leading the Service.

- Leading Self – applies to all staff
- Leading Others – applies to anyone in a managerial role
- Leading the Function – applies to anyone responsible for leading a department or hub
- Leading the Service – applies to those in senior management positions

The levels broadly reflect an individual's role responsibility and represent the minimum standard expected from an individual. The levels are designed to be cumulative with those working at higher levels being able to also demonstrate each preceding level's behaviours. Individuals can demonstrate competencies above their

role or level, which is particularly important when seeking development or promotion opportunities.

The BCF is based on the perception that leadership is not limited to people who manage others and outlines the responsibility of all staff, regardless of the role they hold, to demonstrate leadership behaviours. It provides the foundation of behaviour across the organisation and provides a method of individual performance monitoring for employees irrespective of discipline, role or function. The behavioural competencies also help us to implement and embed inclusion in the way we deliver our services to our communities and our workforce.

Good behaviours and leadership can be demonstrated by anyone in the organisation. Focusing individuals on behavioural competencies in their day to day work can help them understand the minimum standards expected and how they might improve their performance and impact our culture positively.

Across all levels in the organisation, there are 'negative' indicators which enable staff to be self-reflective and recognise areas that they may need to work on to become more effective. The negative indicators also help re-inforce the standards required of staff within our service.

It should be noted that some of the examples of negative indicators may be displayed by employees who are neuro-diverse. Therefore care will need to be given to exploring any underlying conditions that may be contributing to these behaviours before performance is managed.

How are the behaviours used, measured and reviewed?

The BCF is designed to be the basis for everything we do within RBFRS. It will ensure that all our processes, policies, strategies and practices are 'joined-up'. This will be what we look for when we recruit new employees, when we assess performance of current employees or when we look at areas for training and development. It provides a framework for everyone to recognise how they should deal with their colleagues and communities whilst at work.

What are the Behavioural Competencies?

The competencies apply to everyone at every level of RBFRS and are detailed in the diagram below.



| | |
|--|---|
| <p>Personal Impact</p> | <p>We value, respect and promote equality and diversity. The focus is on self-awareness and being a positive presence on others, having personal integrity in being open and honest in whatever we do and an ability to self-manage.</p> <p>We all use leadership to create a positive, open-working environment focusing on ethics and wellbeing.</p> |
| <p>Working Together</p> | <p>We are all positive role models, always demonstrating flexibility and resilient leadership even where we don't manage a team. The focus is on others and how we all demonstrate leadership to create high performance teams and developing people to their full potential.</p> <p>We communicate with integrity, openness and honesty to foster trust and building collaborative working partnerships, acting as ambassadors and role model for the Service.</p> |
| <p>Delivering Quality Service</p> | <p>We put the interests of the public, community and services users first by delivering high quality services now and into the future.</p> <p>We focus on task and all demonstrate leadership to produce outcome-focussed results which meet customer needs continuous improvement and value for money to our customers.</p> |
| <p>Organisational Effectiveness</p> | <p>We ensure everything we do is linked to organisational plans and values, ensuring decisions and actions are beneficial to the customer.</p> <p>We focus on the organisation and all use leadership (even where we don't manage staff) to continuously improve, innovate and change, making objective decisions based on evidence without discrimination or bias</p> |
| <p>Health, Safety and Wellbeing</p> | <p>We are committed to continuously improving the physical and mental health safety and wellbeing of ourselves and all members of the RBFRS team</p> |

The Behavioural Competency Matrix explains these in more detail and how these apply to different levels of the organisation.



Behavioural Competency Matrix

The core behaviours are the same for everyone, but different roles/levels of the organisations should demonstrate these in different ways. This Behavioural Competency Matrix is designed to be used as a reference document which gives examples of what staff should be doing to exhibit the expected behaviours and also the behaviours that they can expect to see from others.

Personal Impact

Link to Core Code of Ethics: Integrity, Dignity and Respect, Accountability, Representing RBFRS, Leadership

We value, respect and promote equality and diversity. The focus is on self-awareness and being a positive presence on others, having personal integrity in being open and honest in whatever we do and an ability to self-manage.

We all use leadership to create a positive, open-working environment focusing on ethics and wellbeing.

| Leading Yourself | Leading Others | Leading the Function | Leading the Service | Negative Indicators |
|---|---|--|--|---|
| I treat others with respect | I encourage different points of view | I role model and mentor others in how they communicate and engage to encourage inclusion | I promote and role model inclusion. I promote and uphold our values and professional standards and communicate the importance of ethical and inclusive approaches to our work | I apply preconceptions and/or stereotyping when dealing with others I display little appreciation of the value of different contributions and perspectives |
| I take account of and accept individual differences | I promote and role model inclusion | | | |
| I set a positive example of appropriate behaviour | I promote a two way dialogue | | | |
| I value equality, diversity and inclusion | I create an environment where people can be themselves at work and the best they can be | | | |

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| <p>I do not prejudge anyone or their circumstances</p> <p>I do not use stigmatising language or behaviour</p> | | | | |
| <p>I actively listen to and value others contributions</p> | <p>I communicate responsibly, with sensitivity and with respect for others</p> <p>I create an environment where people are happy to approach me without fear of recrimination or blame</p> | <p>I resolve conflict in a professional, calm, rational and sensitive way</p> <p>I use a variety of engagement methods to seek feedback and understand people's views</p> | <p>I communicate with passion and integrity to maintain and improve the reputation of the service to staff, stakeholders and the public</p> | <p>I show a lack of interest in interacting with others</p> <p>I do not take the time to listen to others or check my understanding</p> <p>I do not make myself clear when communicating with others</p> |
| <p>I look for opportunities from which to identify my mistakes and celebrate my successes</p> <p>I share my learning with others in my team</p> | <p>I encourage others to look for opportunities from which to learn, identifying their mistakes and celebrate their successes</p> | <p>I seek feedback about my own performance in order to keep learning and developing</p> | <p>I continually evaluate my own performance and take steps to continuously improve</p> | <p>I spend little time on personal and professional development activities</p> <p>As a manager, I do not mentor my team or encourage their development.</p> |

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| | | | | I hold people back from development opportunities |
| <p>I am open to understanding how my actions and behaviours impact on others</p> <p>I recognise and challenge inappropriate behaviour in a calm and rational way</p> | <p>I am aware of my impact on the people around me and I always seek to improve how I work with others</p> <p>I take a proactive approach to dealing with difficult or sensitive situations, helping others to reach an acceptable solution</p> | <p>I recognise and monitor the impact of my decisions</p> <p>I adapt and modify my behaviour in order to meet emerging needs</p> <p>I coach and mentor others to adapt their behaviour</p> | <p>I work hard to build trust by listening to others views and adapting to change</p> | <p>I ignore unacceptable or disrespectful behaviour and allow it to persist</p> <p>I do not proactively highlight to my manager when I am under stress and do not take action to reduce my stress levels</p> <p>I do not evaluate the outcome of my decisions</p> |
| I embrace change | I persist in the face of obstacles and demonstrate a sense of personal responsibility for delivering change through my team | I champion change in the Service | I continually look at improving the organisation and lead the change process. | <p>I never suggest new and improved ways of working</p> <p>I resist change and new ideas</p> <p>I criticise existing procedures without offering suggestions for improvements</p> |

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| <p>I accept feedback and change my performance accordingly</p> | <p>I give constructive feedback to those in my team to improve performance</p> | <p>I ensure that everyone is aware of how they are doing and how their performance can be improved</p> | <p>I encourage the use of 360 degree feedback as a tool to improve performance</p> | <p>I do not accept feedback from others</p> <p>I avoid giving feedback to my team</p> <p>I do not deal effectively with poor performance</p> |
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Working Together

Link to Core Code of Ethics: Integrity, Dignity and Respect, Accountability, Leadership

We are all positive role models, always demonstrating flexibility and resilient leadership even where we don't manage a team. The focus is on others and how we all demonstrate leadership to create high performance teams and developing people to their full potential.

We communicate with integrity, openness and honesty to foster trust and building collaborative working partnerships, acting as ambassadors and role model for the Service.

| Leading Yourself | Leading Others | Leading the Function | Leading the Service | Negative Indicators |
|--|--|--|--|---|
| <p>I take pride and responsibility for the work I do and encourage others to do the same.</p> <p>I build trust with others and create positive working relationships</p> | <p>I work with the team to set clear expectations</p> | <p>I work with people both inside and outside the organisation to set clear work objectives</p> <p>I actively monitor the performance of the team and give positive developmental feedback</p> | <p>I work with others to establish the strategic direction and goals of the organisation</p> | <p>I criticise the service and talk about it in negative terms</p> <p>I do not know/understand the organisational goals</p> |
| <p>I take responsibility and accountability for my own work</p> | <p>I take responsibility for leading an effective team</p> <p>I put into place the actions required to make improvements</p> | <p>I am accountable for the output of my team(s)</p> | <p>I maintain and improve the reputation of the service to staff, stakeholders and the public</p> <p>I use non-stigmatising behaviours or language</p> | <p>I do not take responsibility for myself or those I manage</p> |

| | | | | |
|---|---|--|---|--|
| | | | and non-stereotypical language I promote two-way dialogue | |
| I treat everyone with respect I value and appreciate differences in people | I encourage all the people in my team to speak and share their views I take the time to listen and understand | I value the team and know how to make best use of their diverse skills and strengths I use a variety of engagement methods and tools to seek feedback and understand people's views | I promote all staff to our display outstanding leadership at every level I create an environment where people can be themselves at work and be the best they can be | I create barriers or negative feelings in the team I do not engage with my team or the wider organisation |
| I proactively learn new skills and behaviours | I support others through appraisal and coaching, developing my own skills where necessary I encourage my team to develop I am flexible in my leadership approach adapting to the individual and situation | I look for opportunities to develop people and promote a learning culture I develop future talent and proactively plan for succession. I coach, support and mentor people outside of my own immediate team or discipline | I promote and embed the principles of a learning organisation I ensure fair and effective systems and methods are in place to develop and nurture people's career I role model ethical and outstanding leadership | I do not learn from past experiences. I do not encourage individual and team development I am not willing to explore different methods of learning and development |

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| | <p>to ensure people give their best</p> <p>I value my team and know how to make best use of our diverse skills and strengths</p> | | <p>I encouraging a coaching culture</p> <p>I put in place mechanisms which give people access to coaching and mentoring</p> | <p>I am not fair and equitable when assessing people for succession</p> |
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Delivering Quality Service

Link to Code of Ethics: Putting our Communities First, Integrity, Dignity and Respect, Accountability, Leadership

We put the interests of the public, community and services users first by delivering high quality services now and into the future.

We focus on task and all demonstrate leadership to produce outcome-focussed results which meet customer needs continuous improvement and value for money to our customers.

| Leading Yourself | Leading Others | Leading the Function | Leading the Service | Negative Indicators |
|---|--|---|---|---|
| <p>I act as a role model for Royal Berkshire Fire and Rescue Service</p> <p>I am focused on the needs of the public, community and internal and external service users including issues of safeguarding and inclusion</p> | <p>I seek to understand and address the specific risks and diverse needs of people and/or communities</p> | <p>I consider approaches that achieve better outcomes for communities</p> | <p>I am aware of the wider impact the organisation has on improving community outcomes</p> | <p>I take short-cuts that put our customers, colleagues, communities and/or partners at risk</p> <p>I do not try to improve service delivery</p> |
| <p>I plan ahead and prioritise my work, managing my time effectively to get things done</p> | <p>I look ahead to anticipate issues with local service delivery and performance to make plans and resolve or minimise issues before they become a problem</p> | <p>I monitor the quality of service delivery</p> <p>I share information so that people know how well we are performing and can plan accordingly</p> | <p>I take a long term view to consider the future political, social and economic landscape and effectively communicate this to the organisation</p> | <p>I do not anticipate problems or consider consequences when making decisions</p> <p>I focus on short-term concerns and neglect long-term thinking regarding the future of</p> |

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| | | | | the Fire and Rescue Service |
| I am careful with all types of resources (money, time, materials, fuel and energy) | I develop and review plans to make the best use of resources, and I challenge any misuse of resources | I consider the financial and resource implications of decisions I manage budgets appropriately | I set strategies and budgets through consultation, which represent the best value service for our communities I ensure that all staff demonstrate appropriate levels of business awareness. | I do not consider the financial/resource impact of my decisions I do not appreciate the need to control the use of resources. |
| I come up with ideas to improve the way we do things I take the time to feedback to the Service via the appropriate feedback mechanisms | I develop people focused systems and processes I ensure my team is given the opportunity to feedback to the Service via the appropriate feedback mechanisms | I seek the views of others on service quality and effectiveness to identify ideas for improvement I emphasise the importance of surveying staff and ensure that everyone in my area takes part | I promote the use of formal and informal engagement and consultation methods to get feedback from staff and service users about how we deliver and improve our service I use surveys and polls to find out how people are feeling and act on the results | I do not engage when asked to complete surveys I do not try to help to improve the way we function I do not act on the results of consultation exercises |
| I actively contribute to problem-solving and take time to understand the issues fully | I look to solve problems in different ways to improve the service we provide | I develop and implement solutions or recommendations based on sound evidence and feedback from internal and external sources | I implement systems to measure the quality of our decision making and to learn lessons | I jump to conclusions and do not evaluate evidence effectively |

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| | | | I take account of emerging issues and risks and put in place plans to limit the negative consequences to our service | I do not try to find new and innovative ways of solving problems |
| I make decisions based on evidence | I make decisions based on fact and follow evidence and information prior to making decisions I consider the risks, including financial and resource impacts prior to making decisions | I objectively evaluate the impact of any changes to service delivery to learn lessons and implement that learning | I use evidence from our own and other's organisations to set strategy and direction for the service | I do not look outside the organisation for best practice I do not review decisions made to assess how things could have been done better |
| I work to build trust and constructive working relationships with others I find out about the needs of our service users to ensure we are offering the best service | I encourage my team to build constructive working relationships with others to achieve our aims I am outcome focused in my approach and make decisions based on better service outcomes | I seek out opportunities to work collaboratively across teams and functions to improve service delivery | I proactively build and sustain collaborative relationships with members and partners to reduce barriers to effective working and influence wider public service delivery I encourage innovation, including new technology, to improve service delivery | I do not work with others constructively I work in isolation and do not talk to others regularly to enable me to develop good working relationships I do not identify areas I can work together with others I avoid cooperating and working with others |

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| <p>I work with other departments and foster good working relationships</p> | <p>I encourage my team to work closely with other departments</p> | <p>I work across functions to remove barriers to success by improving communication and promoting collaborative ways of working</p> | <p>I ensure all teams work together by facilitating cross functional meetings and knowledge sharing</p> | <p>I focus on my own work area and do not consider my effect on other departments</p> <p>I do not relate to other areas</p> |
|--|---|---|---|---|

Organisational Effectiveness

Link to Code of Ethics: Putting Our Communities First, Integrity, Dignity and Respect, Accountability, Leadership

We ensure everything we do is linked to organisational plans and values, ensuring decisions and actions are beneficial to the customer.

We focus on the organisation and all use leadership (even where we don't manage staff) to continuously improve, innovate and change, making objective decisions based on evidence without discrimination or bias

| Leading Yourself | Leading Others | Leading the Function | Leading the Service | Negative Indicators |
|--|--|--|--|---|
| <p>I know what the key organisational goals are and how I make a difference to these</p> <p>I question when I don't understand something</p> | <p>I make sure the team understands how our work contributes to and delivers organisational priorities</p> | <p>I am aware of wider organisational and political priorities of the Service and how our function contributes more widely</p> | <p>I lead the organisation and develop the vision mission and strategic business plan, which are inclusive of diverse and changing community risks</p> <p>I take a long-term view which considers the future political, social and economic landscape as well as other public service drivers to set a clear and positive direction for the organisation</p> | <p>I do not understand what the organisational goals are</p> <p>I do not share organisational goals and priorities with my team</p> <p>I do not consider all our stakeholders when setting goals and strategy</p> |
| <p>I work within and understand the organisations policies, procedures and processes</p> | <p>I manage quality in my team and use various sources of feedback and evidence to</p> | <p>I actively seek to understand the nature of risk in various projects and act to</p> | <p>I act as a professional advisor to governance at all levels</p> | <p>I do not have knowledge or follow policies and</p> |

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| | understand how we are performing and managing risk | mitigate those risks or report them | I ensure that our approach to corporate risk is well considered and reasonable in the circumstances | procedures which are relevant to me I do not consider or assess risks to my work. |
| I offer ideas and feedback to improve our services and take on board others' ideas | <p>I encourage staff to be flexible in their approach and empower them to contribute towards and influence decisions</p> <p>I create conditions where team members are empowered to suggest and implement new ways or working</p> <p>I am aware of my position and the impact this can have on others in creating a barrier to suggesting change or different ways of working</p> | <p>I look at what other organisations are doing to solve similar organisational issues, taking on board what they are doing and sharing best practice with them</p> <p>I encourage and respond to challenge appropriately, and am willing to adapt my thinking with new information or better evidence</p> | <p>I strive to establish a learning ethos both internally and externally</p> <p>I create conditions for innovation and change that support our vision</p> | <p>I do not offer ideas for improvement</p> <p>I do not take account of suggestions and ignore ideas put forward to make improvements to the status quo</p> <p>I do not consider different options</p> |
| I continuously seek to improve my performance to contribute to organisational goals. | I promote continuous improvement for the team and the organisation. | I improve business processes to promote more efficient ways of achieving our plans. | I foster and enable continuous improvement through | I do not seek to improve my performance or continue my learning. |

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| | | | using the right tools and methods. | |
| I am open to, and positively engage with, new ways of working | I take time to understand how change will impact on our work and how we can contribute to success, evaluating how things are working and how change is embedded | I take ownership of change and help others to understand, adapt to and implement and embed change | I challenge the status quo and compare our performance against other fire and rescue services, other public services, and other relevant business sectors I evaluate and ensure changes are being embedded in the organisation | I resist change and do not engage with new initiatives I do not strive to continuously improve through organisational change |
| I positively seek organisational information about how well we are doing and what is changing I can be trusted with sensitive information | I set up communication processes to ensure that people in my team have access to accurate information, clarifying information where I need to | I take responsibility for delivering organisational messages professionally even in difficult circumstances | I take responsibility for crafting key organisational messages, monitoring and evaluating how they are being received and passed down the organisation | I am not interested wider organisational issues but and my attitude is to only stick to what I know I do not act with integrity |

Health, Safety and Wellbeing

Link to Code of Ethics: Integrity, Dignity and Respect, Accountability, Leadership, Equality, Diversity and Inclusion,

We are committed to continuously improving the physical and mental health safety and wellbeing of ourselves and all members of the RBFRRS team.

| Leading Yourself | Leading Others | Leading the Function | Leading the Service | Negative Indicators |
|--|---|---|--|--|
| I put safety first at all times and do not cut corners to make tasks easier | I role model the importance of safety | I put safety at the top of the agenda at all functional meetings | I demonstrate commitment to health and safety by highlighting it at every opportunity | I pay lip service to safety I do not put safety at the top of my agenda I ignore safety to get things done |
| I report incidents, near misses and safety concerns immediately | I carefully investigate safety issues and make changes as a result | I review safety statistics on a monthly basis and share learning with my own department and across the wider service | I refer to safety statistics when making strategic decisions to ensure that the organisation learns from past experience | I put safety issues down to operator error and do not look for underlying issues I do not learn from the mistakes of the past |
| I am aware of the facilities provided by RBFRRS to support mental and physical wellbeing I alert my manager to my own wellbeing needs and | I encourage my team to make use of the facilities provided to support mental and physical wellbeing | I ensure that my department has the opportunity to make use of the facilities provided to support mental and physical wellbeing | I proactively champion the provision of facilities to support physical and mental wellbeing of the service | I do not look after my own wellbeing I do not take the time to support my team with regard to their wellbeing |

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| <p>utilise internal support mechanisms</p> | | | | |
| <p>I participate in events that drive positive wellbeing initiatives</p> | <p>I engage with my team to promote and enhance employee health and wellbeing</p> | <p>I will lead and manage across the organisation to embed and maintain health and wellbeing as part of everyday activities</p> | <p>I foster good relations by promoting an environment where employee wellbeing is integrated into day to day practices</p> | <p>I do not engage with wellbeing initiatives</p> <p>I do not recognise the value health and wellbeing</p> |
| <p>I talk to and support my colleagues about their health and wellbeing</p> <p>I look after the people around me and look for signs that someone may need support</p> | <p>I take an interest in my team and talk to them about their wellbeing</p> <p>I ensure that any health issues within the team are followed up and help and assistance is offered</p> <p>I provide support based upon the individuals needs</p> | <p>I seek an overview of the department to manage the health and wellbeing of the department</p> <p>I ensure managers supporting others receive the support they require as appropriate</p> | <p>I will ensure that mechanisms are in place to support individuals with health and wellbeing issues</p> <p>I review the reasons for absence such as work place stress, taking action to reduce these</p> | <p>I avoid discussing health issues with my colleagues</p> <p>I do not support my team</p> |

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ROYAL BERKSHIRE FIRE AUTHORITY REPORT



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|---------------------------|---|
| COMMITTEE | AUDIT AND GOVERNANCE COMMITTEE |
| DATE OF MEETING | 24 JANUARY 2022 |
| SUBJECT | GENDER AND ETHNICITY PAY GAP REPORTS 2021 |
| LEAD OFFICER | BECCI JEFFERIES, HEAD OF HR AND LEARNING AND DEVELOPMENT |
| LEAD MEMBER | N/A |
| EXEMPT INFORMATION | NONE |
| ACTION | DECISION |

1. EXECUTIVE SUMMARY

- 1.1 The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017 introduced a requirement for the Authority to publish statutory calculations every year showing how large the pay gap is between their male and female employees, as per the calculations detailed on the UK government website (gov.uk). Information must normally be published on the Authority's website before 31 March each year and uploaded onto the Government's Gender Pay Gap Reporting Service.
- 1.2 Ethnicity Pay Gap reporting is not currently mandatory in the UK, however, it is likely that mandatory reporting will be introduced in 2023. To that end, RBFRS has also completed an Ethnicity Pay Gap Report for 2021.
- 1.3 The calculations are complex and prescriptive and include set pay elements on which to base the comparison between male and female pay. The complexities of Retained Duty System (On-Call) pay and working patterns increases the difficulties in reporting for RBFRS.
- 1.4 The pay elements included in the calculation are: hourly rate; allowances; on call rates; salary sacrifice deductions; shift premiums and holiday pay and excludes overtime.
- 1.5 This Gender and Ethnicity Pay Gap Reports are based on the hourly pay rates as at 31 March 2021 (the 'snapshot' date for the public sector).

Agenda Item 11

- 1.6 Our findings for 31 March 2021 identify a median Gender Pay Gap of 9.63% (last year's national median average was 15.5%) The median rate is used because it removes the effect of outliers which can skew the figures.
- 1.7 A Gender Pay Gap Action plan has been developed which covers our findings from 2021 (see Appendix B). An Ethnicity Pay Gap Action plan is currently being developed and will be included in our existing Equality Diversity and Inclusion Action Plan.

2. **RECOMMENDATION**

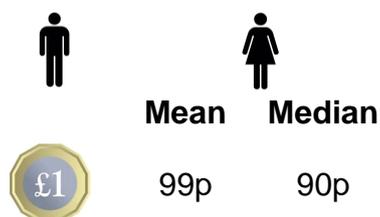
The Audit and Governance Committee is invited to:

- 2.1 **NOTE** the details of the Gender Pay Gap Report shown in Appendix A and agree it is published on the RBFRS website and on gov.uk;
- 2.2 **NOTE** the Gender Pay Gap Action Plan in Appendix B; and
- 2.3 **NOTE** the details of the Ethnicity Pay Gap Report shown in Appendix C and agree it is published on the RBFRS website.

3. **REPORT**

Gender Pay Gap

- 3.1 Appendix A shows the findings from the calculations used to report the Gender Pay Gap for RBFRS. The method of calculation is set by the Government Gender Pay Gap service and is complex and is made more so by the complex Retained Duty System (On-Call) work patterns and pay structures.
- 3.2 The Gender Pay Gap Report is based on data as at 31 March 2021 at which point Royal Berkshire Fire and Rescue Service (RBFRS) employed 644 staff, with 486 (75.4%) being male and 157 (24.4%) being female. This does not include a member of staff who do not identify as male or female.
- 3.3 The mean gender pay gap is calculated by adding up the hourly rate of all male/female employees and dividing that figure by the total number of male/female employees.
- 3.4 The median gender pay gap is calculated by listing all hourly rates of each gender and finding the central rate. The median rate is considered to be a better measure as it 'discounts' very high or very low rates which can skew the figures.
- 3.5 A positive pay gap indicated men are paid more than women. A negative pay gap indicates women are paid more than men.
- 3.6 Our findings have identified overall the mean gender pay gap is 0.78% (i.e. men are paid slightly more than woman) and the median is 9.63% (i.e. the median pay for men is more than that of women).
- 3.7 In simple terms for each £1 earned by men, at RBFRS, women earn:



3.8 At RBFRS the median gender pay gap is considerably better than the available national figures (2020). The national median gender pay gap for 2020 was 15.5%.

3.9 As part of our reporting we are required to identify the mean and median pay gap for the four quartiles which are shown below. Figures for 2020 have also been included for comparison

| Quartile | Mean Pay Gap | | Median Pay Gap | |
|--------------|--------------|--------|----------------|--------|
| | 2020 | 2021 | 2021 | 2021 |
| Lower | -3.09% | -3.95% | -4.94% | -2.25% |
| Lower Middle | 1.29% | 0.73% | 1.90% | 0.55% |
| Upper Middle | 4.51% | -0.09% | -4.81% | -0.66% |
| Upper | -12.69% | -0.89% | 4.10% | 2.57% |

3.10 A review of the quartiles shows a decrease in all quartiles in terms of the median pay gap from last year. The Lower and Upper Middle quartiles showed a small increase in the mean gender pay gap. The Upper quartile showed a significant decrease from last year. The reported figures for 2020 figures are also contained in the Gender Pay Gap Report (Appendix A).

3.11 Due to the various elements which make up pay in the fire service including allowances, detachment payments and uniform allowances, the quartiles can be very fluid and therefore pay gaps in this area can appear to be different from the pay gap as a whole.

3.12 It is recognised that women are still significantly underrepresented in the operational workforce accounting for 6.5% of this group (as at 31 March 2021), which represents a slight increase from 6.2% in 2020. The service continues to work hard to attract a more diverse workforce through a positive action plan and recruitment opportunities.

3.13 RBFRS is confident that it is paying the same salary to roles of equivalent value to staff. Where specific circumstances exist and can be evidenced and the benefit or risk to the organisation quantified, a role specific salary supplement may be applied to an individual, subject to consideration of a business case. An equal pay audit was completed and presented to the Committee on 4 November 2019. The next equal pay audit is due in 2022.

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- 3.14 The overall mean pay gap is 0.78%.
- 3.15 The overall median pay gap is 9.63%.
- 3.16 In line with government guidance issued by the Government Equalities Office an action plan was developed and updated accordingly (Appendix B).
- 3.17 The Report and its action plan will be published on our website and the gender-pay-gap.service.gov.uk site in accordance with the requirements of The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017.

Ethnicity Pay Gap

- 3.18 Appendix C shows the findings from the calculations used to report the Ethnicity Pay Gap for RBFRS. The method of calculation is the same as that set by the Government Gender Pay Gap service and is complex and is made more so by the complex Retained Duty System (On-Call) work patterns and pay structures. However, instead of calculating the gap using male and female, the ethnic groups of White and Ethnic Minority are used. All Staff identifying as White regardless of other descriptor e.g. White-Irish or White-Other are allocated to the White group for the purposes of reporting in accordance with guidance.
- 3.19 The Ethnicity Pay Gap Report is based on data as at 31 March 2021 at which point Royal Berkshire Fire and Rescue Service (RBFRS) employed 644 staff with 612 (95%) being White and 28 (4%) being Ethnic Minority. 4 staff (1%) have not disclosed their ethnicity.
- 3.20 The mean ethnicity pay gap is calculated by adding up the hourly rate of all White/Ethnic Minority employees and dividing that figure by the total number of White/Ethnic Minority employees.
- 3.21 The median ethnicity pay gap is calculated by listing all hourly rates of each ethnicity group and finding the central rate. The median rate is considered to be a better measure as it 'discounts' very high or very low rates which can skew the figures.
- 3.22 A positive pay gap indicated those in the White group are paid more than those in the Ethnic Minority group. A negative pay gap indicates that White staff are paid more than Ethnic Minorities.
- 3.23 Our findings have identified overall the mean ethnicity pay gap is 1.74% (i.e. those in the White group are paid slightly more than those in the Ethnic Minorities group and the median is 9.63% (i.e. White staff are paid slightly more than Ethnic Minorities)
- 3.24 In simple terms for each £1 earned by white staff, at RBFRS, Ethnic Minorities earn:

| | Mean | Median |
|---|-------------|---------------|
|  | 98p | 90p |

- 3.25 There are currently no published national figures available to compare the ethnicity pay gap at RBFRS to other organisations.
- 3.26 As part of our reporting we are required to identify the mean and median pay gap for the four quartiles which are shown below. As this is the first year of ethnicity pay gap reporting, there is no comparison available for last year, however this will be included in future reports.

| Quartile | Mean Pay Gap | Median Pay Gap |
|-----------------|---------------------|-----------------------|
| Lower | 4.27% | 0% |
| Lower Middle | 2.94% | 3.89% |
| Upper Middle | 2.83% | 4.02% |
| Upper | -9.64% | 1.43% |

- 3.27 Due to the various elements which make up pay in the fire service including allowances, detachment payments and uniform allowances, the quartiles can be very fluid and therefore pay gaps in this area can appear to be different from the pay gap as a whole.
- 3.28 The overall proportion of Ethnic Minority staff across each of the quartiles is broadly consistent, with the highest proportion being found in the upper quartile. This indicates there is no mobility or progression concerns relating to Ethnic Minority staff that are evident from the overall statistics. However, it is acknowledged that culturally, barriers may exist which are not evident from these figures, and that staff in Ethnic Minority groups may experience challenges regarding their career progression due to their protected characteristics, and RBFRS is taking action to identify any such trends and address this.
- 3.29 It is recognised that staff from Ethnic Minority groups are significantly underrepresented across the Service, and RBFRS commits to working hard to attract a more diverse workforce, and has taken action to address the overall diversity within RBFRS. Examples of this can be found in the Ethnicity Pay Gap report.
- 3.30 The overall mean ethnicity pay gap is 1.74%.
- 3.31 The overall median ethnicity pay gap is 9.63%.

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4. CONTRIBUTION TO STRATEGIC COMMITMENTS

- 4.1 Commitment 5 – We will ensure that Royal Berkshire Fire and Rescue Service provides good value for money.

5. FINANCIAL IMPLICATIONS

- 5.1 There are no direct financial implications arising from this report.

6. LEGAL IMPLICATIONS

- 6.1 RBFRS is required to publish its gender pay gap figures for 2021 before 31 March 2022. A failure to comply with the Public Sector Equality Duty or the specific duties can be investigated and enforced by the Equality and Human Rights Commission or alternatively challenged by way of judicial review.

7. EQUALITY DIVERSITY AND INCUSION IMPLICATIONS

- 7.1 The report identifies that a gender pay gap does exist in RBFRS, reflecting that overall males are paid more than females on average. This can be attributed to the different terms and conditions. The Gender Pay Gap Report (Appendix A), Ethnicity Pay Gap Report (Appendix C) and the Gender Pay Gap Action Plan (Appendix B) outlines the measures being taken to tackle this issue across the Service. An Ethnicity Pay Gap action plan is being developed and will be incorporated into our EDI Action Plan.

8. RISK IMPLICATIONS

- 8.1 Failure to publish gender pay information annually before 31 March each year would be a breach of the Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017.
- 8.2 There are currently no requirements to publish Ethnicity Pay Gap information, however this will be published on the RBFRS website along with the Gender Pay Gap information.
- 8.3 An equal pay audit was completed based on data as at February 2019 and did not highlight any issues of pay inequality at RBFRS. This report was presented to the Audit and Governance Committee meeting on 4 November 2019. The next equality pay audit will be undertaken in 2022.

9. CONSISTENCY WITH DUTY TO COLLABORATE

- 9.1 N/A.

10. PRINCIPAL CONSULTATION

- 10.1 Monitoring Officer
10.2 Head of Finance and Procurement
10.3 Chief Fire Officer

11. BACKGROUND PAPERS

Not included on the report but available on request:

- 11.1 The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017
- 11.2 RBFRS Positive Action Plan
- 11.3 RBFRS Equality Diversity and Inclusion Action Plan
- 11.4 Managing Gender Pay Reporting Guidance (issued by ACAS in conjunction with the Government Equalities Office) February 2019
- 11.5 Equal Pay Audit reported to Audit and Governance Committee 4 November 2019

12. APPENDICES

- 12.1 Appendix A – RBFRS Gender Pay Gap Report 2021
- 12.2 Appendix B – Gender Pay Gap Action Plan
- 12.3 Appendix C – RBFRS Ethnicity Pay Gap Report 2021

13. CONTACT DETAILS

- 13.1 Lucy Greenway, HR Adviser

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Royal Berkshire Fire and Rescue Service

Gender Pay Gap Report 2021



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Appendix A

Executive Summary

The gender pay gap report for Royal Berkshire Fire and Rescue Service (RBFERS) provides information on the pay gap that exists between males and females within the Service. The pay gap is calculated using the mean and median average rates of hourly pay for males and females and this is also split into four quartile pay bands. A positive pay gap shows that males are paid more than females.

Our mean pay gap is 0.78% and our median pay gap is 9.63%. This shows on average for each £1 earned by males, females earn 99p according to the mean gender pay gap and 90p for the median. The median gap is a more accurate measure of a gender pay gap as it discounts very high or very low rates of pay that can skew the overall average. The national median gender pay gap for 2020 was 15.5%.

The mean and median pay gap is also calculated for each of the quartile pay bands (lower, lower middle, upper middle and upper). Due to the various elements making up pay within the Fire Service, including allowances and payments for additional responsibilities, these quartiles can be very fluid and pay gaps across the quartiles can appear different from the overall pay gap. Each quartile is also impacted year on year by movement within the quartiles in terms of recruitment of new staff, pay increases and promotions.

While RBFERS is confident that it is paying the same salary to roles of equivalent value to all staff, it is recognised that women are significantly underrepresented in the operational workforce, and the Service continues to work hard to attract a more diverse workforce through a positive action plan and recruitment opportunities.

Background

Gender pay gap reporting requires employers with more than 250 employees to publish statutory calculations every year showing how large the pay gap is between their male and female employees. The method for calculating this information is published on the UK government website gov.uk.

RBFRS are required to report on the following:

| | |
|------------------------------|---|
| Mean gender pay gap | The difference between the mean hourly rate of pay of male employees and that of female employees as a percentage. |
| Median gender pay gap | The difference between the median hourly rate of pay of male employees and that of female employees as a percentage. |
| Mean bonus gap | The difference between the mean bonus pay paid to male employees and that paid to female employees as a percentage. |
| Median bonus gap | The difference between the median bonus pay paid to male employees and that paid to female employees as a percentage. |
| Bonus proportions | The proportions of male and female relevant employees who were paid a bonus during the relevant period |
| Quartile pay bands | The proportions of male and female employees in the lower, lower middle, upper middle and upper quartile pay bands. |

In 2020 the UK average Gender Pay Gap using Office for National Statistics Data shows the average median pay gap for all employees is 15.5% (please note, the national average mean pay gap figures are not published).

RBFRS reported the lowest average median and the third lowest mean gender pay gap for our Fire Service family group in 2020.

RBFRS' Pay and Bonus Gender Pay Gap

This Gender Pay Gap Report is based on data as at 31 March 2021. RBFRS employed 644 staff with 486 (75.4%) being male and 157 (24.4%) being female, this does not include one member of staff who do not identify as male or female.

Due to national reporting requirements and provisions, RBFRS can only report the Gender Pay Gap for 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 and is not limited to the binary of male and female.

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Appendix A

| Year | Mean | | Median | |
|---------|-------|-------|--------|-------|
| | 2020 | 2021 | 2020 | 2021 |
| Pay Gap | 9.17% | 0.78% | 1.51% | 9.63% |
| Bonus* | N/A | N/A | N/A | N/A |

* RBFRS does not offer a bonus scheme therefore this measure has not been calculated. Additional Responsibility Allowances (ARAs) and Continuous Professional Development (CPD) payments are included in ordinary pay. For clarity, ordinary pay is defined as basic pay, shift premium pay, pay for piecework, pay for leave and allowances.

A **positive** pay gap shows that males earn 0.78% more than females based on a **mean** hourly rate of pay and 9.63% more than females on **median** hourly rates of pay.

What do the mean and median gender pay gap figures tell us?

The mean gives an overall indication of the size of the gender pay gap in RBFRS. A high mean gender pay gap indicates that a payment system is operated that disadvantages women. At RBFRS, the median gender pay gap is considerably less than the most recently published national figures. This indicates that when comparing the median hourly rates for the workforce as a whole, males earn on average slightly more than females.

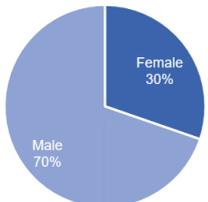
The median is typically a more representative figure as the mean can be skewed by a handful of highly paid employees. The median value for RBFRS across all staff is higher than the mean, suggesting there is some skewing throughout the organisation (this can be seen more clearly when you compare quartile on quartile).

The quartile distribution detailed below (which is based on the actual hourly ordinary pay for all staff) gives an indication of how males and females are distributed across the organisation, in addition to the mean and median pay gap in each of the quartiles.

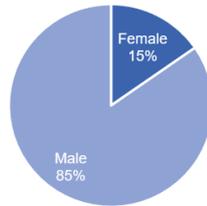
Quartile Pay Bands

The proportion of males/females in each quartile pay band is as follows:

| Quartile | Year | Mean Pay Gap | Median Pay Gap |
|----------|------|--------------|----------------|
| Lower | 2021 | -3.95% | -2.25% |
| | 2020 | -3.09% | -4.94% |

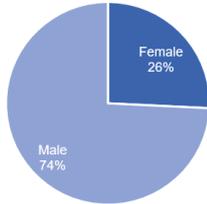


Lower Middle



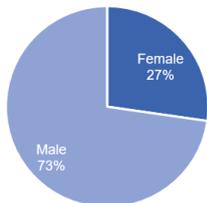
| | | |
|-------------|--------------|--------------|
| 2021 | 0.73% | 0.55% |
| 2020 | 1.29% | 1.90% |

Upper Middle



| | | |
|-------------|---------------|---------------|
| 2021 | -0.09% | -0.66% |
| 2020 | 4.51% | -4.81% |

Upper



| | | |
|-------------|---------------|--------------|
| 2021 | -0.89% | 2.57% |
| 2020 | -12.69% | 4.10% |

Commentary

The mean and median pay gap was calculated for each of the quartiles to give an indication of the range and distribution of male and female pay. The figures above differ from the overall gender pay gap for RBFRS due to the scope for variation in hourly pay. This is as a result of the large range of roles and grades in the upper middle and upper quartiles compared to the smaller ranges in the lower quartiles.

The proportion of female employees in the workforce as a whole has increased by three per cent since the last report.

In the Lower quartile one apprentice in post is female and appears at the lower end of the band, whilst the top end of the quartile is made up of competent Firefighters who are mostly male. The ratio of females in the lower quartile has increased by nine per cent, with the higher earning staff being mostly female which accounts for the negative pay gap for the mean and median.

In the Lower Middle quartile, additional payments for specific skills are included in the hourly rate. Most additional payments are made for skills associated with the role of Firefighters who are mainly male. This makes a difference to the overall mean and median in this quartile and in RBFRS as a whole. The majority of Firefighters and Crew Managers in this quartile are male. They are employed on the National Joint Council (NJC) for Local Authority Fire and Rescue Service (Grey Book) which attract additional allowances that are not available to staff conditioned to the to the NJC for Local Government Services (Green Book), the majority of which are female.

In the Upper Middle quartile, the bottom is made up of Watch Managers who are exclusively male, whilst the top of the quartile is made up of Grade 4 and Grade 5 Green Book employees who are mainly female. The mean average pay gap for this quartile has decreased this year due to a higher proportion of females in this quartile.

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Appendix A

The Upper quartile includes nine Heads of Service (six male and three female) and five Directors (three male and two female). It contains a high proportion of higher earning employees conditioned to the NJC for Local Government Services (Green Book), the majority of which are female.

It is recognised that women are still significantly underrepresented in the operational workforce accounting for 6.5% of this group as at 31 March 2021 and this represents a slight increase from 6.2% in 2020. The service continues to work hard to attract a more diverse workforce through a positive action plan and recruitment opportunities, however this has continued to be hindered by the reduction in activities resulting from the COVID-19 pandemic. RBFRS is confident that it is paying the same salary to roles of equivalent value to all staff.

An action plan has been developed to help the organisation to address the gap, which is appended to this report.

Wayne Bowcock
Chief Fire Officer and Chief Executive
December 2021

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| Action reference | Date Action added | Government Equalities office suggested Focus Area | Questions asked as recommended by Government Equalities Office | Action | Progress to date | Last review date | Target date | Stakeholders | Responsible owner | Comments | Open / Closed |
|------------------|-------------------|--|--|---|---|------------------|---|------------------------------------|------------------------------|---|---------------|
| 1 | Oct-19 | Is it recruitment, retention or progression (or all three) that contribute to our GPG? | Do we have a plan to address under representation? | See Positive Action, Action Plan to address under representation within our organisation | Equality Diversity & Incl\Positive Action\ | 01-Oct-21 | Ongoing | All Staff | EDI Coordinator | | Open |
| 2 | Oct-19 | Is it recruitment, retention or progression (or all three) that contribute to our GPG? | Do women and men join RBFRS at different levels? | Equal Pay Audit undertaken to assess starting salaries | Equal Pay audit did not highlight any issues with this area - enhanced monitoring for future audit has begun to simplify the review in future years and introduction of HR quarterly checks to ensure accuracy of reporting | 01-Oct-19 | 30-Oct-19 | SLT / HR /Staff | HR Adviser | Completed | Closed |
| 3 | Oct-19 | Is it recruitment, retention or progression (or all three) that contribute to our GPG? | Is there a gender imbalance at application / shortlist / job offer? | Monitor different sector recruitment throughout recruitment process | WT campaign monitoring completed and percentage progression consistent throughout the process up to interview - report provided to EDI forum on recruitment stats. 2021 campaign to be reviewed January 2022. Green book - review reported to EDI Forum, further statistical review to be completed January 2022 Control - review to be undertaken following October recruitment campaign completion EDI data update for recruitment now included in the Strategic Performance Board (SPB) quarterly reporting (from Q4 2021/22) | 01-Oct-21 | 31 January 2022 and after each campaign | All staff and potential applicants | Emma Rickards/ Emma Scott | Attraction rates for operational staff known issue see Action ref 1. Further action delayed due to Covid pandemic | Open |
| 4 | Oct-19 | Is it recruitment, retention or progression (or all three) that contribute to our GPG? | Do women and men leave RBFRS at the same rate and for the same reasons? | Review leaver data Male v Female consider reasons and pay levels on leaving | Leaver demographics analysis undertaken, further analysis to be undertaken of leaver data to review pay levels on leaving. Exit survey reviewed and re-published to allow for further analysis of leaver data. Leaver data reviewed on a quarterly basis | 01-Oct-20 | 30-Sep-20 | All Staff | Jorgie Wright/Lucy Greenway | Completed | Closed |
| 5 | Oct-19 | Is it recruitment, retention or progression (or all three) that contribute to our GPG? | Do people get 'stuck' at certain levels within your organisation. Are women applying for promotions at the same rate as men? | Review promotion process to consider demographics of applicants. | Information to be reviewed after current promotion processes - these have been delayed due to the COVID pandemic. Continuous review of progression and promotion data at SPB from Q4 2021/22 | 01-Oct-21 | Quarterly | All Staff | R&D | | Open |
| 6 | Oct-19 | Is RBFRS clear in its pay and progression processes? | Do we advertise flexible working Policies Internally and externally? | Review benefits pages | Reviewed as part of recruitment project | 31-Jul-19 | 31-Jul-19 | All Staff and potential applicants | HR Adviser/EDI Co-ordinator | Completed | Closed |
| 7 | Oct-19 | Is RBFRS clear in its pay and progression processes? | Do you have standardised transparent recruitment processes that remove opportunities for bias? | Review of recruitment policies and awareness training | Policy reviewed and published - training to be rolled out incorporating job design / advert writing / shortlisting and unconscious bias. Launch of behaviour competency framework which will permeate all aspects of working life at RBFRS, whereby inappropriate behaviours will be challenged and positive behaviours are encouraged | 01-Sep-20 | 31-Mar-21 | All recruiting Mangers | HR Adviser | Awareness training commenced September 2020 | Closed |
| 8 | Oct-19 | Is RBFRS clear in its pay and progression processes? | Do all employees have the same access to information on promotion pay rises and bonuses? | Equal pay audit undertaken to assess merit payments Operational promotion policy to be reviewed | Equal pay audit completed - no issues identified Promotion policy reviewed | 21-Oct-19 | 31-Mar-21 | All staff | HR Adviser | Completed | Closed |
| 9 | Oct-19 | Organisational responsibility for EDI and driving Change | Do you have a dedicated head of Diversity and Inclusion? | Ownership of EDI considered at SLT level | Allocated to AM in Service Delivery, | | 01-Apr-19 | SLT / EDI Forum members | SLT | A temporary dedicated EDI Coordinator has been recruited to support embedding of EDI agenda within the organisation | Closed |
| 10 | Oct-19 | Organisational responsibility for EDI and driving Change | Is diversity and inclusion a regular item on your board agenda? | Consideration of EDI at appropriate forum | EDI forum set up which feeds back to SLT for areas for decision making | | 01-Apr-19 | SLT / EDI Forum members | Becci Jefferies | Completed | Closed |
| 11 | Oct-19 | Organisational responsibility for EDI and driving change | Do you review your actions to monitor effectiveness and adapt to changing circumstances? | Review of EDI action Plan and Positive Action plan to monitor effectiveness and adapt to changing circumstances | EDI Action plan / Positive Action plan reviewed regularly and reported back through to EDI Forum | | 01-Apr-19 | SLT / EDI Forum members | Becci Jefferies and Forum | Completed | Closed |

| Action reference | Date Action added | Government Equalities office suggested Focus Area | Questions asked as recommended by Government Equalities Office | Action | Progress to date | Last review date | Target date | Stakeholders | Responsible owner | Comments | Open / Closed |
|------------------|-------------------|--|---|--|---|------------------|-------------|--------------------------|-------------------------------|--|---------------|
| 12 | Oct-19 | Additional Actions following the Equal Pay Audit 2019 specific to RBFRS GPG 2019 | Are all allowances paid by RBFRS equitable? | Review of uniform allowance | Proposal to consult instigated | 21-Oct-19 | 30-Mar-20 | TVFCS | HR / GM TVFCS | Completed | Closed |
| 13 | Oct-19 | Additional Actions following the Equal Pay Audit 2019 specific to RBFRS GPG 2019 | Is CPD allowance accessible to all employees? | Review application process and form required to receive CPD | Feedback sought and plan in place to update the process | 16-Sep-19 | 31-Dec-19 | Operational Staff | HR Adviser | Completed | Closed |
| 14 | Oct-19 | Additional Actions following the Equal Pay Audit 2019 specific to RBFRS GPG 2019 | Are spinal column starting points free from unconscious bias? | Development of enhanced system for monitor and review starting pay points and reasons thereof | Spreadsheet in place and HR inputting as required, utilising hyperlink to evidence. This provides a detailed audit trail. | 20-Oct-19 | 30-Oct-19 | All Green Book staff | HR Adviser | Completed | Closed |
| 15 | Oct-19 | Additional Actions following the Equal Pay Audit 2019 specific to RBFRS GPG 2019 | Are merit payments given in a fair and equitable manner? | Monitor the allocation of merit payments and reasons thereof. | Recording mechanism reviewed and process updated to ensure all requests are logged in HR and monitored by the HR Manager | 16-Sep-19 | 30-Oct-19 | All Staff | HR Adviser | Completed | Closed |
| 16 | Oct-19 | Gathering Further evidence (evidence identified internally by RBFRS required to further inform development of actions to reduce GPG) | N/A | Review the attraction of applicant for Green Book roles over last 2 years to identify if the gender make up of applicants varies depending on grade of role to ascertain if fewer women are joining at higher salaries | Statistical review set up to enable the attraction rates of Green Book candidates in all areas for future recruitment campaigns. Further information is also collected through the revised Exit Interview process, which aims to identify and address any issues related to retention of female staff. | 01-Oct-19 | 30-Mar-20 | HR / All Staff | HR Adviser | Completed | Closed |
| 17 | Oct-19 | Gathering Further evidence (evidence identified internally by RBFRS required to further inform development of actions to reduce GPG) | N/A | Undertake further analysis of length of service at each role before achieving promotion (male v female) (support action ref 5) | Commenced (delayed due to COVID pandemic). This data review will now be incorporated into the quarterly EDI update for SPB (from Q4 2021/22) | 01-Oct-21 | Quarterly | HR / All Staff | EDI Coordinator | | Open |
| 18 | Oct-19 | Gathering Further evidence (evidence identified internally by RBFRS required to further inform development of actions to reduce GPG) | N/A | Review of Maternity returners - do they return? | Commenced (delayed due to COVID pandemic) | 01-Oct-20 | 31-Mar-21 | HR / All Staff | HR Adviser | | Closed |
| 19 | Oct-19 | Gathering Further evidence (evidence identified internally by RBFRS required to further inform development of actions to reduce GPG) | N/A | Review process for seeking views regarding barriers female employees face within RBFRS. Roll out of Behavioural Competency Framework | Survey undertaken with regard to views of female operational employees regarding culture and progression. Report written on the findings and any conclusions will be built into the EDI action plan. Behavioural Competency Framework to be re-launched in 2022 in line with revised Employee Code of Conduct. | 01-Oct-21 | 31-Mar-22 | HR / All Staff | EDI Coordinator HR Adviser | | Open |
| 20 | Oct-19 | "Reducing the gender pay gap and improving gender equality in organisations" (Guidance form GEO) 2019 | https://gender-pay-gap.service.gov.uk/public/assets/pdf/Evidence-based_actions_for_employers.pdf | Review actions as outlined in the "Reducing the gender pay gap and improving gender equality in organisations" (Guidance form GEO) 2019 and incorporate into GPG action plan as appropriate | A number of areas have been actioned as recommended in the report - <ul style="list-style-type: none"> • Review of work based assessments • Review of Interview practices - leading to the development of further training • Advert templates reviewed in line with language and recommended publicity of pay ranges • EDI Forum development • Benefits review including flexible benefits - this review identified that RBFRS offers a comprehensive and very flexible range of benefit options which support inclusion • Targeting underrepresented groups - e.g. Women returners • Provision of enhanced training for recruiting managers (job design through to selection in including unconscious bias) | 01-Oct-20 | 31-Mar-21 | All Staff and Applicants | HR / EDI Coordinator | - Gender decoder incorporated into the advert process/guidance - Employers Equal Opportunity statement for job advert - EDI Training rolled out across the service | Closed |

Royal Berkshire Fire and Rescue Service

Ethnicity Pay Gap Report 2021



Agenda Item 11

Appendix C

Executive Summary

The ethnicity pay gap report for Royal Berkshire Fire and Rescue Service (RBFRS) provides information on the pay gap that exists between White and Ethnic Minority staff within the Service. Currently there is no legislative requirement for organisations to publish their ethnicity pay gap but RBFRS has opted to publish this information voluntarily.

The ethnicity pay gap is calculated using the mean and median average rates of hourly pay for White and Ethnic Minority staff, and this is also split into four quartile pay bands. A positive pay gap shows that White staff are paid more than Ethnic Minority staff.

Our mean pay gap is 1.74% and our median pay gap is 9.63%. This shows on average for each £1 earned by White staff, Ethnic Minority staff earn 98p according to the mean ethnicity pay gap and 90p for the median. The median gap is a more accurate measure of an ethnicity pay gap as it discounts very high or very low rates of pay that can skew the overall average.

The mean and median pay gap is also calculated for each of the quartile pay bands (lower, lower middle, upper middle and upper). Due to the various elements making up pay within the Fire Service, including allowances and payments for additional responsibilities, pay gaps across the quartiles can appear different from the overall pay gap.

While the overall proportion and number of staff from Ethnic Minority staff across each of the quartiles is broadly consistent, it is recognised that Ethnic Minorities are underrepresented in the workforce. RBFRS is taking action to address this including the development of a positive action plan and developing community engagement activities through our Local Safety Plans.

Background

Currently organisations with more than 250 employees are required to publish their gender pay gap by law, but there is no requirement to publish their ethnicity pay gap. RBFRS has therefore opted to publish these figures for 2021 voluntarily. The method for calculating the ethnicity pay gap mirrors that of gender pay gap reporting and show how large the pay gap is between their White and Ethnic Minority employees.

Royal Berkshire Fire and Rescue Service (RBFRS) report on the following:

| | |
|---------------------------------|---|
| Mean ethnicity pay gap | The difference between the mean hourly rate of pay of White employees and that of Ethnic Minority employees as a percentage. |
| Median ethnicity pay gap | The difference between the median hourly rate of pay of White employees and that of Ethnic Minority employees as a percentage. |
| Mean bonus gap | The difference between the mean bonus pay paid to White employees and that paid to Ethnic Minority employees as a percentage. |
| Median bonus gap | The difference between the median bonus pay paid to White employees and that paid to Ethnic Minority employees as a percentage. |
| Bonus proportions | The proportions of White and Ethnic Minority relevant employees who were paid a bonus during the relevant period |
| Quartile pay bands | The proportions of White and Ethnic Minority employees in the lower, lower middle, upper middle and upper quartile pay bands. |

This is the first time that RBFRS has reported the ethnicity pay gap, and due to the reporting of ethnicity pay gap figures being voluntary rather than a legal requirement, there are no national average figures reported to benchmark RBFRS ethnicity pay gap. However annual figures published by the Home Office in November 2021 relating to Fire and Rescue Service workforce diversity data suggests that across all Fire Services 5.3% of staff were from an Ethnic Minority.

RBFRS' Pay and Bonus Ethnicity Pay Gap

This ethnicity pay gap report is based on data as at 31 March 2021. RBFRS employed 644 staff with 612 (95%) being White and 28 (4%) being Ethnic Minority. Four staff (1%) have not disclosed their ethnicity.

Due to the reporting requirements and provisions, RBFRS can only report the ethnicity pay gap for staff who declare their ethnicity.

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Appendix C

RBFRS follows the CIPD and Race Disparity Audit's recommendations in this report, referring to 'Ethnic Minorities' rather than BME/BAME (black and minority ethnic/black, Asian and minority ethnic) which highlights some groups and omits others.

The overall ethnicity pay gap for RBFRS is as follows:

| | Mean | Median |
|---------|-------|--------|
| Year | 2021 | 2021 |
| Pay Gap | 1.74% | 9.63% |
| Bonus* | N/A | N/A |

* RBFRS does not offer a bonus scheme therefore this measure has not been calculated. Additional Responsibility Allowances (ARAs) and Continuous Professional Development (CPD) payments are included in ordinary pay. For clarity, ordinary pay is defined as basic pay, shift premium pay, pay for piecework, pay for leave and allowances.

A **positive** pay gap shows that White staff earn 1.74% more than Ethnic Minorities based on a **mean** hourly rate of pay and 9.63% more than Ethnic Minorities based on **median** hourly rates of pay.

What do the mean and median ethnicity pay gap figures tell us?

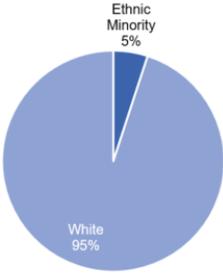
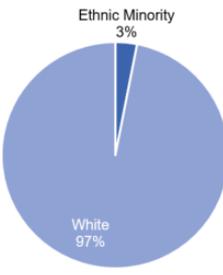
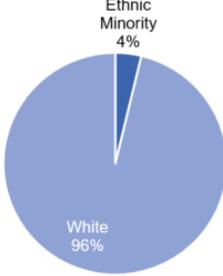
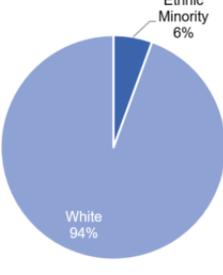
The mean gives an overall indication of the size of the ethnicity pay gap in RBFRS. A high mean ethnicity pay gap would indicate a payment system that disadvantages Ethnic Minorities. This indicates that when comparing the mean hourly rates for the workforce as a whole, White staff earn on average more than Ethnic Minorities.

The median is typically a more representative figure as the mean can be skewed by a handful of highly paid employees. The median value for RBFRS across all staff is higher than the mean, suggesting there is some skewing throughout the organisation (this can be seen more clearly when you compare quartile on quartile).

The quartile distribution detailed below (which is based on the actual hourly ordinary pay for all staff) gives an indication of how White and Ethnic Minority staff are distributed across the organisation, in addition to the mean and median pay gap in each of the quartiles.

Quartile Pay Bands

The proportion of White/Ethnic Minority staff in each quartile pay band is as follows:

| Quartile | Mean Pay Gap | Median Pay Gap |
|---|---------------|----------------|
| <p>Lower</p>  | 4.27% | 0% |
| <p>Lower Middle</p>  | 2.94% | 3.89% |
| <p>Upper Middle</p>  | 2.83% | 4.02% |
| <p>Upper</p>  | -9.64% | 1.43% |

Commentary

The mean and median pay gap was calculated for each of the quartiles to give an indication of the range and distribution of White and Ethnic Minority pay. The figures above differ from the overall ethnicity pay gap for RBFERS due to the scope for variation in hourly pay.

In the lower quartile, seven staff are from Ethnic Minorities, in the lower middle five staff are from Ethnic Minorities, in the upper middle quartile there are six staff from Ethnic Minorities and in the upper quartile there are ten staff from Ethnic Minorities. In each of these quartiles, staff from Ethnic Minorities are represented across a range of grades and roles.

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While the overall proportion and number of staff from Ethnic Minority staff across each of the quartiles is broadly consistent (which indicates there may not be mobility or progression concerns relating to Ethnic Minority staff), it is recognised that Ethnic Minorities are still underrepresented in the workforce. It is also acknowledged that culturally, barriers may exist which are not evident from these figures, and that staff in Ethnic Minority groups may experience challenges regarding their career progression due to their protected characteristics. RBFRS is taking action to identify any such trends and address this.

Notwithstanding the known issues with underrepresentation amongst Ethnic Minority groups, RBFRS pays staff in accordance to nationally agreed terms and conditions, and is satisfied that it is paying the same salary to roles of equivalent value across all staff groups.

The Service continues to work hard to attract a more diverse workforce and has already taken actions to address the overall diversity within the RBFRS workforce. These include but are not limited to:

- A positive action plan and recruitment opportunities, including attendance at careers events and the hosting of Have a Go Days at our stations. These activities have however this has continued to be hindered by the reduction in activities resulting from the COVID-19 pandemic.
- The Chairman's Internship which is aimed at 16 to 18 year old residents of Berkshire from ethnic backgrounds that are currently under-represented in the Service. This is a paid internship that gives students an opportunity to develop workplace skills and discover opportunities available within RBFRS.
- Identifying and developing community engagement activities through our Local Safety Plans

An Ethnicity Action Plan is being developed and this will be incorporated into our existing Equality Diversity and Inclusion Action Plan.

Wayne Bowcock

Chief Fire Officer and Chief Executive

December 2021

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ROYAL BERKSHIRE FIRE AUTHORITY REPORT

| | |
|---------------------------|--|
| COMMITTEE | AUDIT AND GOVERNANCE COMMITTEE |
| DATE OF MEETING | 24 JANUARY 2022 |
| SUBJECT | LOCAL PENSIONS BOARD SIX-MONTHLY REPORT |
| LEAD OFFICER | LINCOLN BALL, CHAIR OF LOCAL PENSIONS BOARD |
| LEAD MEMBER | N/A |
| EXEMPT INFORMATION | NONE |
| ACTION | NOTE |

1. EXECUTIVE SUMMARY

- 1.1 This six-monthly report updates the Audit and Governance Committee with respect to the activities of the Local Pensions Board.
- 1.2 The Local Pensions Board has continued its work meeting twice since last reporting to the Audit and Governance Committee in July 2021
- 1.3 It is evident to the Local Pensions Board that the complexity and resource demand in administering firefighter pensions has increased over the last six months.
- 1.4 Overall, within the context of a very challenging pensions' environment and the results of the most recent internal audit available, the Local Pensions Board considers that the administration of the firefighter pension schemes is compliant with the guidance and to a good standard.

2. RECOMMENDATION

That Audit and Governance Committee:

- 2.1 **NOTE** the contents of this report; and
- 2.2 **NOTE** likely future changes in the composition of the Local Pensions Board as identified in paragraphs 3.5 to 3.8.

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3. **REPORT**

Background

- 3.1 Royal Berkshire Fire Authority is the overall Scheme Manager for the various firefighter pension schemes and the Local Pensions Board exists to assist the Fire Authority in relation to assuring compliance with the legislation and guidance with respect to the pension schemes.
- 3.2 The Local Pensions Board has a Terms of Reference detailing the composition of the board, governance arrangements and responsibilities of the board members. The Board also maintains a code of conduct, a risk register, an actions and decisions log and a performance monitoring system.
- 3.3 Whilst RBFRS has staff within the Human Resources department who devote considerable proportions of their working time to pension matters, the service has also contracted administration to West Yorkshire Pension Fund, an enterprise which administers firefighters' pensions for approximately 45% of the English fire and rescue services.

Local Pensions Board Membership

- 3.4 The Board consists of four members –two management representatives (Mark Arkwell and Lucy Greenway) and two scheme member representatives (Lincoln Ball and Steve Collins). Chairing the Board rotates between the management and the member representatives. Currently Lincoln is the Chair and Lucy the vice-Chair.
- 3.5 The Chair of the Local Pensions Board, Lincoln Ball, will be retiring from the Fire and Rescue Service at the end of February 2022 and has indicated a willingness to maintain a role within the Local Pensions Board following his retirement.
- 3.6 The Terms of Reference for the Board cite two conditions for a 'member' representative of the Board:
- i. They need to be members of an RBFA Scheme. A retired firefighter is a 'beneficiary' member as opposed to an 'active' member if still employed; or have experience of representing pension scheme members in a similar capacity.
 - ii. They should be able to demonstrate their capacity to attend meetings, prepare and train.
- 3.7 The Terms of Reference also cites that up to three other members may be appointed to the Board either by the Fire Authority or by the Board itself.

- 3.8 As such, the Board considers that it would be acceptable for a retired firefighter to hold a position on the Local Pensions Board.

Local Pensions Board Activity

- 3.9 The Board has met formally on two occasions since the last report to the Audit and Governance Committee (19 July 2021) and on each occasion has received an update on activities and current issues from the responsible managers from the Human Resources department.
- 3.10 The Pensions Board has been made aware of one breach of the pensions' regulations since the last report to the Audit and Governance Committee. This breach involved a single case of a firefighter not being notified that they had been auto-enrolled into the 2015 Firefighters' Pension Scheme. This breach has been properly reported to The Pensions Regulator. The underlying administrative issue has been resolved and in the absence of any feedback to the contrary, this matter is not being treated as materially significant.
- 3.11 Pension Board members also scrutinise the monthly reports sent by the administrators.
- 3.12 The Board Members also keep up to date with the broader pensions environment through reading the regular bulletins and factsheets produced by the LGA.
- 3.13 The Pensions Board has recently assisted the service with a review of the Firefighter's Pension Scheme discretions that will bring the pension scheme discretions of all firefighter pension schemes into a single document. The recommendations from this exercise will be brought to the Fire Authority in its role as the Scheme Manager.
- 3.14 The Pensions Board has continued to scrutinise the performance of the Pensions Administrator (West Yorkshire Pensions Fund) and a representative of the Board is always invited to and regularly attends formal or informal contract meetings between RBFRS and the administrator. It seems clear that the workloads of the administrators are relatively intense and in turn present an increased degree of administrative risk.

Other Significant Issues

- 3.15 Addressing the age discrimination elements of the transitional provisions of the 2015 Firefighters' Pension Scheme remains an area of significant activity and ongoing complexity. 1 April 2022 is set to be the date where new legislation comes into force and all active members are transferred to the 2015 Firefighters' Pension Scheme. However, as that date has got closer the administrative complexities have intensified.

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- 3.16 Home Office guidance had been in place about how to deal with immediate detriment cases, i.e. people about to retire or retired since 2015 as 2015 scheme members. A national agreement was reached between the LGA and FBU on the protocols that would be followed with union assurances that it would not support future legal challenges where the protocol had been followed. However, the Home Office subsequently withdrew its guidance in late November 2021. This has left Fire Authorities with additional financial risks of compensation payments not being funded by HM Government for any cases addressed before 1 April 2022 and litigation risks from scheme members supported by their representative body if immediate detriment cases are not addressed before 1 April 2022.
- 3.17 Royal Berkshire Fire Authority determined on 7 December 2021 that it should continue to support immediate detriment cases for active scheme members retiring before 1 April 2022 with a decision to extend this to firefighters already retired pending whilst further clarification and understanding is sought.
- 3.18 There is also a current legal challenge to HM Government from a number of public sector trade unions in relation to the Government's intention to incorporate the costs of remedying the age discrimination into the cost control mechanism of the various public sector pension schemes. As background, the cost control mechanism for the 2015 firefighters' pension scheme has a cost cap of 16.8% of pensionable earnings of members of this scheme. Broadly if the sustained costs of the scheme go more than two percentage points above the cap, known as the ceiling, the contribution rates from scheme members would need to go up. If the costs fall more than two per cent below the cap, known as the floor, then the annual accrual rates would go up. In the last valuation in 2016 it was found that the valuation costs had fallen below the floor to 11.8%. As a result the Scheme Advisory Board recommended that scheme benefits should be improved from an annual accrual rate of 1/59.7 to 1/51.2. The process was then put on hold pending the outcome of the age discrimination remedy.

4. CONTRIBUTION TO STRATEGIC COMMITMENTS

- 4.1 Commitment 5 – We will ensure that Royal Berkshire Fire and Rescue Service provides good value for money.

5. FINANCIAL IMPLICATIONS

- 5.1 The Fire Authority currently provides an allowance of £104 per meeting available to each Pensions Board member. However, not all board members currently choose to receive this allowance.

- 5.2 Should the Pensions Board require additional expenditure such as attendance to conferences or delivery of training, the board will seek approval from the Head of HR&L&D.

6. LEGAL IMPLICATIONS

- 6.1 The provision of the Local Pensions Board is a requirement of the Public Service Pensions Act 2013.

7. EQUALITY DIVERSITY AND INCLUSION IMPLICATIONS

- 7.1 The current national issues in relation to firefighter pensions relate directly to age discrimination and the Equality Act 2010 and as such Royal Berkshire Fire Authority's actions and procedures to address these matters also directly relate to being assured that the law is applied.

- 7.2 To reduce the risk of discrimination, the resolutions made by the Fire Authority at its meetings of 17 February and 7 December 2021 gave effect to the Employment Appeal Tribunal judgment for individuals who meet the eligibility criteria.

8. RISK IMPLICATIONS

- 8.1 If there is a failure to comply with the requirements of The Public Service Pensions Act 2013 and related regulations which may become increasingly likely given the legal determinations, current guidance and complexity with relation to the pension schemes then we can expect that there will be an increase in reports of potential breaches of the legislation, administrative errors, complaints and further legal proceedings leading to reputational and financial loss which are significant given the Fire Authority's strategic commitments.

- 8.2 If local pension board members, who are lay members, possess insufficient knowledge of the various firefighter pensions issues, which is possible given the complexity of the firefighters pensions legislation and guidance, then we can expect that the oversight and assurance provided to the Fire Authority will be negatively affected which is significant given this is a legal requirement of the Public Sector Pensions Act 2013.

- 8.3 The outcomes of the 2021 RBFPS internal audit of pensions' administration are being reported separately to the Audit and Governance Committee. The previous internal audit reported in January 2021 cited 'substantial assurance' that robust systems are in place for pensions' administration and are being followed.

9. CONSISTENCY WITH DUTY TO COLLABORATE

- 9.1 The legislation enables the establishment of joint boards with others. This is not a matter being pursued currently within Royal Berkshire Fire and Rescue Service.

10. PRINCIPAL CONSULTATION

- 10.1 The Chief Fire Officer has been consulted on the contents of this report.
10.2 The Chief Finance Officer has been consulted on the contents of this report.
10.3 The Monitoring Officer has been consulted and on the contents of this report.

11. BACKGROUND PAPERS

- 11.1 None.

12. APPENDICES

- 12.1 None.

13. CONTACT DETAILS

- 13.1 Lincoln Ball, RBFRS Pensions Board Chair, 07768 034 856.

ROYAL BERKSHIRE FIRE AUTHORITY



| | |
|---------------------------|---|
| COMMITTEE | AUDIT AND GOVERNANCE COMMITTEE |
| DATE OF MEETING | 24 JANUARY 2022 |
| SUBJECT | QUARTERLY PERFORMANCE REPORT 2021-22 QUARTER 2 (JULY - SEPTEMBER 2021) |
| LEAD OFFICER | BECCA CHAPMAN; DATA PERFORMANCE AND RISK MANAGER & SAM FAULKNALL-MILLS; PERFORMANCE AND PLANNING OFFICER |
| LEAD MEMBER | N/A |
| EXEMPT INFORMATION | NONE |
| ACTION | TO NOTE |

1. **EXECUTIVE SUMMARY**

- 1.1 To provide Audit & Governance Committee with an overview of the Royal Berkshire Fire and Rescue Service (RBFRS) second quarter (July - September 2021) performance for the 2021/22 financial year.

2. **RECOMMENDATION**

That the Audit & Governance Committee:

- 2.1 **NOTE** the performance against Service Provision and Corporate Health measures for the targets agreed by the Fire Authority for 2021/22.
- 2.2 **NOTE** the progress made on the four priority programmes.
- 2.3 **NOTE** the position of corporate risk.
- 2.4 **DISCUSS** and **AGREE** any further actions, if appropriate.

3. **REPORT**

- 3.1 The quarterly performance report supports the Performance Management Framework which provides structure and governance that will enable RBFRS to measure, monitor and manage outputs and outcomes in a timely manner, allowing the organisation to respond and make informed decisions to ensure that statutory obligations and the Fire Authority's Strategic Commitments are successfully delivered.

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- 3.2 Following data capture, review and analysis, evidence is reviewed by the Strategic Performance Board (SPB) whose purpose is to lead, support and monitor the effective delivery of the Strategic Objectives by monitoring and reviewing performance across the four Quadrants.
- 3.3 Informed by these processes, key data and highlights have been extracted and reviewed by the Senior Leadership Team (SLT) and are presented in this report for scrutiny at the Audit and Governance committee.
- 3.4 The attached report provides an overview of performance for the second quarter (July - September 2021) performance for the 2021/22 financial year. It reports performance in four key areas:
- 3.5 Quadrant one - Service Provision - This section presents data and information which will allow members to monitor how RBFRS are doing at delivering its statutory obligations and any internal services provided between teams, departments and functions.
- 3.6 Quadrant two - Corporate Health - This section brings together all data, information and measures from across the organisation, which will allow members to monitor how RBFRS are managing key resources, e.g. People and Finance.
- 3.7 Quadrant three - Priority Programmes (IRMP, People Strategy, Strategic Asset Investment Framework and the HRRB Project) - This section will allow members to monitor progress of work designed to deliver a defined outcome which is different to or improves on current working practices, policies and procedures in support of delivering against the strategic commitments and corporate plan 2019-23.
- 3.8 Quadrant four - Corporate Risk - This section groups provides an assessment of corporate risks that may impact on service delivery. This section will also include data and information from audit monitoring and an update on the HMICFRS Action Plan.

4. CONTRIBUTION TO STRATEGIC COMMITMENTS

- 4.1 Commitment 1 – We will provide education and advice on how to prevent fires and other emergencies.
- 4.2 Commitment 2 – We will ensure a swift and effective response when called to emergencies
- 4.3 Commitment 3 - We will provide advice, consultation and enforcement in relation to fire safety standards in buildings.
- 4.4 Commitment 4 – We will seek opportunities to contribute to a broader safety, health and wellbeing agenda, whilst delivering our core functions.
- 4.5 Commitment 5 – We will ensure that Royal Berkshire Fire and Rescue Service provides good value for money.
- 4.6 Commitment 6 – We will work with Central Government and key stakeholders in the interests of the people of Royal Berkshire.

5. FINANCIAL IMPLICATIONS

- 5.1 This report provides RBFA financial information under the corporate health quadrant.

6. LEGAL IMPLICATIONS

- 6.1 There are no legal implications arising from this report

7. EQUALITY AND DIVERSITY IMPLICATIONS

- 7.1 This report provides RBFRS equality and diversity information under the corporate health quadrant.

8. RISK IMPLICATIONS

- 8.1 This report provides RBFRS corporate risk information under the risk quadrant.

9. CONSISTENCY WITH DUTY TO COLLABORATE

- 9.1 This report provides information on RBFRS performance measures and targets, as such there are no identified areas for collaboration.

10. PRINCIPAL CONSULTATION

- 10.1 The Chief Fire Officer was consulted during preparation of this report.
10.2 The Head of Finance and Procurement was consulted on the content of this report.

11. BACKGROUND PAPERS

- 11.1 Annual Plan 2021/22.

12. APPENDICES

- 12.1 Attached as a separate item to the agenda.

13. CONTACT DETAILS

- 13.1 Sam Faulknall-Mills
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Data, Performance and Risk Manager
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0118 938 4605

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