

## Due Regard Statement

Please use this statement to evidence how 'due regard to' the three aims of the public sector equality duty has been made (section 149 of the Equality Act 2010) during the development of the 'policy'.<sup>1</sup>

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited by the ACT;
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
- Foster good relations between people who share a protected characteristic

Name of the 'policy':	<b>Gloucestershire Fire and Rescue Service Integrated Risk Management Plan (IRMP) 2018 -21</b>
Person(s) responsible for completing this statement	Area Manager Clive Webber (clive.webber@glosfire.gov.uk)
Briefly describe the activity being considered including aims and expected outcomes	<p>Under the Fire and Rescue National Framework for England, it is a legal requirement that the Fire Authority (GCC) produce an Integrated Risk Management Plan (IRMP).</p> <p>The IRMP shows how Gloucestershire Fire and Rescue Service (GFRS) will manage safety risks for the next three years. The development process causes GFRS to consider the safety risks that all members of our community face and how GFRS can best manage those risks.</p> <p><b>Activity:</b> Development and implementation of an IRMP for the period 2018 – 2021.</p> <p><b>Aims:</b> The aims of the IRMP are to deliver our Service Aims in the most efficient and effective way.</p> <p>GFRS Service Aims are:</p> <ul style="list-style-type: none"> <li>• <b>People:</b> This supports a motivated and well developed workforce understanding, supporting and driving change for the Service.</li> </ul>

<sup>1</sup> For 'policy': any new and existing policy, strategy, services, functions, work programme, project, practice and activity. This includes decisions about budgets, procurement, commissioning or de-commissioning services, service design and implementation.

- **Prevention and Protection:** This gap analysis identifies many areas of Prevention and Protection we currently undertake and where we may need to focus in the future.
- **Response and Resilience:** Response will be enhanced through greater understanding of potential governance, improved collaboration and shared resources.
- **Performance:** Promoting a better understanding of our legal responsibilities to provide continual improvement, collaboration in delivering services while demonstrating value for money.

We would also expect the IRMP to consider the following issues:

- To identify existing and potential risks to the communities of Gloucestershire
- To evaluate the effectiveness of current prevention initiatives and emergency response arrangements
- To identify opportunities for improvement and determine our future approach to service delivery
- To determine future resource requirements needed to meet foreseeable risks

#### **Expected Outcome**

The expected outcome is to reduce risk and suffering to a degree that we can justifiably claim to have 'delivered' on our mission statement which is:

“Working together we will provide the highest standard of community safety and emergency response services to the communities of Gloucestershire”

## Documenting use of sufficient information

Please document below the data and information sources that you have used to understand the needs, participation and experiences of each protected group. Evidence must be gathered as the policy is developed and used to inform decisions.

### Service user data

Service user data is an important source of evidence and should be collated as part of routine monitoring of in- house or external services. If service user data is not available record 'not known' and use the action plan to identify what improvement actions will be used to gather data going forward.

[Service user diversity reports](#) are available on our website and give an indication of service user participation across commissioning areas, for example adult residential services and youth services. It does not include participation data at individual service level.

### Needs analysis

[Gloucestershire population demographics](#) data is available to understand the representation of different protected groups across the county and help with needs analysis. Data like this may also be also useful for benchmarking to identify under or over representation of a service by any of the protected groups. For example, a service is open to all residents and from monitoring you know that 2% of service users are disabled: However, demographic data indicate that 16.7% of Gloucestershire residents report having a disability or long term limiting illness. This finding can be used to explore if there are barriers to participation by residents with disabilities and how this can be addressed as part of the development of your 'policy'.

### Data gaps

You may find that you have more information about some of the protected groups for example, gender, age, disability and less about others, for example, sexual orientation and religion and/or belief. If data is not available and you intend to start collating data about a protected characteristic please use the action plan to outline how this data will be collated. You can find equality monitoring guidance on our [website](#) including an equality monitoring template.

If you have no plans to start collating data about a protected characteristic please state the rational why.

### Service information (if applicable) or Needs analysis (if applicable)

<b>Who is responsible for delivering the service?</b>	Gloucestershire Fire and Rescue Service are commissioned by Gloucestershire County Council to discharge the responsibilities attributable to them in their capacity as the Fire Authority under the Fire and Rescue Services Act 2004.
<b>Service user data/Needs analysis information</b>	
Age	<p>Persons of all ages may potentially be service users although the Home Office fire statistics (April 2015 to March 2016) identified that persons aged over 80 are almost four times more likely to die in a dwelling fire, than people of all ages.</p> <p>Nationally, persons aged 65 to 79 are twice as likely to die in a dwelling fire, than persons of all ages. In Gloucestershire the greatest growth in population over the past 10 years has been in the 65+ age group which increased by 25% or 25,411 people, this growth rate was higher than the national figure of 21% (inform Gloucestershire - Population Profile 2017 Report).</p> <p>On current trends, the latest ONS 2014-based projections suggest that Gloucestershire's 65+ population will experience the greatest growth, increasing by almost 82,500 people by 2039.</p> <p>This information helps to inform our prevention work.</p>
Disability	<p>According to the 2011 Census 16.7% of Gloucestershire residents reported having a long-term limiting health problem or disability.</p> <p>Long-term limiting health problems or disabilities, particularly amongst more elderly members of the community, are linked to vulnerability to fire from a variety of perspectives ranging from forgetfulness to susceptibility to injury and inability to escape unaided.</p> <p>Predictably the incidence of long-term limiting health problems or disabilities increases exponentially with age, at the time when data was collected 49% of people in Gloucestershire aged 65+ had a long-term health problem compared to 18.3% among the 50 to 64 age group.</p> <p>For these reasons the prevention work undertaken by GFRS targets those with disabilities and poor health.</p>
Sex	<p>People of either gender are likely to be service users, the GCC Population Analysis for Protected Characteristics, based on census data shows a county population that has a gender split with a slight bias towards females (49% male to 51% female).</p> <p>The Fire deaths in the South West Report (2008-13), identifies that slightly more men were victims of accidental fire</p>

	<p>than women. However, the gender difference is far more significant when age is also taken into account, with over 60% of female victims were aged over 65, compared to just 36% of male victims. The average age of a male victim was 56 years compared to 68 years for a female victim.</p> <p>One possible explanation for this variation between the genders could be that more elderly women live alone, compared to men, due to a longer life expectancy. Just 7.14% of men in South West England are aged over 75 compared to 10.26% of women.</p> <p>This information informs our targeted prevention work.</p>
Race (including Gypsy and Traveller)	<p>The 2011 Census found that overall, 4.6% of the population in Gloucestershire was from Black and Minority Ethnic (BME) backgrounds; this figure increased to 8.4% when the Irish, Gypsy or Irish Traveller and 'other White' categories were included.</p> <p>The proportion of people from Black and Minority Ethnic backgrounds was considerably lower than the national figure of 14.6%. Ethnicity in itself is not a barrier to service use, persons from any ethnic origin may be service users, the information and more detailed information from MAIDeN about population location is of value in identifying where we need to 'fit' our approach to prevention work to the needs of the local population.</p>
Gender reassignment	<p>No data has been collected on this particular group, however it is not believed that gender reassignment would be a barrier to service use.</p>
Marriage and civil partnership	<p>Information based on the Gloucestershire County Council Population Profile (2017) suggest that just over 50% of Gloucestershire's residents aged 16+ are married, this is higher than the national figure.</p> <p>The proportion of the population who are divorced or widowed also exceeds the national figure while the proportion of people who are single or separated is below the national figure.</p> <p>There is considerable variation in marital status between the age groups, with those aged 16-24 most likely to be single and those aged 65+ most likely to be widowed. This may have an impact on the family support people have available to them and the level of support they require from elsewhere.</p> <p>Marital status or cohabitation do not have a direct impact on ability to access GFRS services although there is a projected increase in single person households (57% increase by 2033). Living alone does make people more vulnerable to fire, particularly when combined with low income and a higher age bracket.</p>
Pregnancy and maternity	<p>Gloucestershire County Council Population Profile (2017) suggests that there were 6,697 births in Gloucestershire in 2015.</p> <p>The highest proportion of deliveries were by women aged 30 to 34 continuing the trend of later motherhood.</p>

	All pregnant women are potential service users in a similar manner to those who aren't pregnant.
Religion or Belief	<p>According to the 2011 Census, 63.5% of residents in Gloucestershire were Christian, making it the most common religion; this was followed by no religion which accounts for 26.7% of the total population.</p> <p>Other religions made up the following percentages: Muslim 1.0%, Hindu 0.4%, Buddhist 0.3%, Jewish 0.1%, Sikh 0.1%, other religion 0.5% and 7.5% religion not stated.</p> <p>People of all faiths are likely to be service users.</p>
Sexual Orientation	<p>There is no definitive data on sexual orientation at a local or national level.</p> <p>Estimates used by the Department of Trade and Industry in 2003, and quoted by Stonewall, suggest around 5-7% of the population aged 16+ are lesbian, gay or bisexual. If this figure were applied to Gloucestershire it would mean somewhere between 25,400 and 35,500 people in the county are LGB.</p> <p>A person's sexual orientation would not be a barrier to service use.</p>

## Other information

Gloucestershire Fire and Rescue Service – Prevention Strategy.

The Service works in conjunction with a number of stakeholder and partner organisations e.g. NHS Foundation Trust 2gether, Gloucestershire Care Services, GCC Adult Social Care Team, Age UK, Red Cross etc in order to address identified risks across all protected characteristic groups.

We acknowledge that fire and other emergencies do not discriminate based on individual characteristics and as an organization when responding to emergency incidents neither do we.

We do however acknowledge that certain protected characteristic groups are more likely to be involved in fire as demonstrated by the seven fire risk factors (mental health; poor housekeeping; alcohol; smoking; drugs – prescription or illegal; limited mobility; living alone), identified by the South West Fire and Rescue Services' as a collective. As such, we focus our prevention activities towards preventing fires in these groups and amongst those most vulnerable in the communities we serve.

Delivery of change under the key objectives outlined with the IRMP may have an effect on some or all of GFRS staff; this includes all staff regardless of age, disability, sex, race, gender reassignment, marriage and civil partnership, pregnancy and maternity, religion or belief and sexual orientation.

Effects to staff may be felt through changes brought about by proposals put forward under HM Governments Fire Service Reform agenda and/or by changes in legislation invoked under the Policing and Crime Act 2017. Changes may include a requirement to work more flexibly (terms and conditions), changes to shift patterns and a potential for a change in primary employer possibly invoking actions taken under the TUPE Regulations.

## Workforce data

Please document details of GCC staff only if they will be affected by the proposed activity. This could include GCC staff transferring under TUPE to a new service provider, relocating, employment at risk. **GCC [Workforce diversity reports](#)** are available on our website.

If the proposed activity does not affect GCC staff, please state 'Not affected below'.

Total number of GCC staff affected	433 (figure taken from Gloucestershire Fire and Rescue Service Annual Business Plan 2017/18).
Age	<p>Due to terms and conditions of service primarily related to pension schemes the maximum pensionable age for operational staff is currently set at between 50 and 60; the numbers able to retire before 55 are diminishing due to the implementation of a new 'CARE' scheme. Individuals can opt to retire earlier (55) under the 'CARE' scheme and take a reduced pension.</p> <p>The Service currently employs 415.68 operational staff of which only two work part time hours or have flexible working arrangements in place (as at Mar 2017).</p> <p>The contractual split is thus:</p> <p>Full time: 175.68 FTE</p> <p>On-call: 189.1 FTE or headcount of 240.</p> <p>All other staff (including fire control) fall within a different set of conditions of service applicable to local government employees with normal retirement age set by HM Government; this now ranges between 65 and 67 although individuals can opt to retire earlier and take a reduced pension.</p> <p>The Service currently employs 69 individuals that fall within this group who work under a mix of full and part time contracts.</p>



Disability		<b>Control</b>	<b>Non-Uniformed</b>	<b>Retained</b>	<b>Wholetime</b>	<b>OVERALL</b>
	Disabled	0.00%	4.26%	0.44%	1.13%	<b>1.06%</b>
	Not Disabled	80.00%	53.19%	59.73%	80.23%	<b>67.66%</b>
	Unstated	20.00%	42.55%	39.82%	18.64%	<b>31.28%</b>
	<b>TOTAL</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>
Sex		<b>Control</b>	<b>Non-Uniformed</b>	<b>Retained</b>	<b>Wholetime</b>	<b>OVERALL</b>
	Female	65.00%	48.94%	10.18%	18.64%	<b>19.57%</b>
	Male	35.00%	51.06%	89.82%	81.36%	<b>80.43%</b>
	<b>TOTAL</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>
Race (including Gypsy and Traveller)		<b>Control</b>	<b>Non-Uniformed</b>	<b>Retained</b>	<b>Wholetime</b>	<b>OVERALL</b>
	Asian	0.00%	0.00%	0.00%	1.13%	<b>0.43%</b>
	Black	0.00%	0.00%	0.00%	1.69%	<b>0.64%</b>
	Mixed	0.00%	0.00%	0.00%	2.26%	<b>0.85%</b>
	Other	0.00%	0.00%	0.00%	0.56%	<b>0.21%</b>
	White British	95.00%	76.60%	76.99%	77.40%	<b>77.87%</b>
	White Other	0.00%	0.00%	0.00%	1.69%	<b>0.64%</b>
	Unstated	5.00%	23.40%	23.01%	15.25%	<b>19.36%</b>
	<b>TOTAL</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>
Marriage and civil partnership		<b>Control</b>	<b>Non-Uniformed</b>	<b>Retained</b>	<b>Wholetime</b>	<b>OVERALL</b>
	Divorced	5.00%	4.26%	0.44%	1.13%	<b>1.28%</b>
	Marr/Civ Ptn	30.00%	29.79%	2.65%	20.34%	<b>13.19%</b>
	Single/Never Marr	10.00%	6.38%	0.00%	1.69%	<b>1.70%</b>
	Widowed	0.00%	0.00%	0.00%	0.56%	<b>0.21%</b>
	Rather not Say	0.00%	2.13%	0.44%	1.69%	<b>1.06%</b>
	Unstated	55.00%	55.74%	96.46%	74.58%	<b>82.55%</b>
	<b>TOTAL</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>
Pregnancy and maternity	2 individuals on pregnancy leave; 1 individual on maternity leave.					

Religion or Belief	<p>There is reluctance amongst employees to provide specific information regarding this characteristic. As such reliable and accurate information for this group is not available at this time. We will continue to work with GCC HR to establish figures and include as and when available.</p>																																									
Sexual Orientation	<table border="1"> <thead> <tr> <th></th> <th>Control</th> <th>Non-Uniformed</th> <th>Retained</th> <th>Wholetime</th> <th>OVERALL</th> </tr> </thead> <tbody> <tr> <td>LGBT</td> <td>0.00%</td> <td>0.00%</td> <td>0.00%</td> <td>1.13%</td> <td><b>0.43%</b></td> </tr> <tr> <td>Heterosexual</td> <td>45.00%</td> <td>42.55%</td> <td>38.94%</td> <td>25.99%</td> <td><b>34.68%</b></td> </tr> <tr> <td>Rather not Say</td> <td>20.00%</td> <td>12.77%</td> <td>5.31%</td> <td>6.21%</td> <td><b>7.02%</b></td> </tr> <tr> <td>Unstated</td> <td>35.00%</td> <td>44.68%</td> <td>55.75%</td> <td>66.67%</td> <td><b>57.87%</b></td> </tr> <tr> <td><b>TOTAL</b></td> <td><b>100.00%</b></td> <td><b>100.00%</b></td> <td><b>100.00%</b></td> <td><b>100.00%</b></td> <td><b>100.00%</b></td> </tr> </tbody> </table>							Control	Non-Uniformed	Retained	Wholetime	OVERALL	LGBT	0.00%	0.00%	0.00%	1.13%	<b>0.43%</b>	Heterosexual	45.00%	42.55%	38.94%	25.99%	<b>34.68%</b>	Rather not Say	20.00%	12.77%	5.31%	6.21%	<b>7.02%</b>	Unstated	35.00%	44.68%	55.75%	66.67%	<b>57.87%</b>	<b>TOTAL</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>
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Gender reassignment	<p>There are no individuals covered by this group within the workforce.</p>																																									

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## Consultation and engagement

List all types of consultation that has taken place during the development of this activity. Include on-line consultations, events, meetings with stakeholders, community events, employee consultation exercises etc

Service users	<p>The next stage of the IRMP development process is to undertake a period of consultation with the public, partners and other stakeholders using both printed and electronic media to enable access to as many respondents as possible.</p> <p>The consultation will focus on whether these groups agree that the three key objectives put forward are the right things for the Service to focus efforts and resources on across the next three years. The key objectives are:</p> <ul style="list-style-type: none"> <li>• <b>Objective 1 - Increased focus on prevention and protection initiatives</b> by delivering innovative solutions to prevention activities and doing this in partnership with other community stakeholders such as the Police, Ambulance, Adult Social Care Teams, Vulnerable Children and Public Health.</li> <li>• <b>Objective 2 - Explore, further develop and maximise opportunities to collaborate with partners and other stakeholders</b> in order to make the most effective use of our resources, increase our efficiency and deliver activities with tangible 'social value'</li> <li>• <b>Objective 3 - Reconfigure and reform our Service</b> with the aim of driving efficiencies across the Service, delivering continual improvements in working practices, even greater levels of value for money than are already achieved and a Service that is fit for purpose both now and in the years to come.</li> </ul> <p>Following consultation, the Service will undertake a conscientious review of comments and observations made thereby providing opportunity to revise the content of the draft IRMP 2018 - 21 in line with public and stakeholder expectation before final approval and implementation by GCC Cabinet in April 2018.</p>
Workforce	<p>A series of visits and presentations have been made to all staff groups in order to provide information and take observations, thoughts, comments and ideas which have been used to help develop the draft IRMP.</p> <p>Representative Bodies i.e. Unions will be invited to comment on the draft IRMP once this has been approved by GCC for release for consultation amongst stakeholders.</p>
Partners	<p>Our partners and other stakeholders will be included in the consultation process.</p>
External providers of services	<p>Not applicable, though the surrounding six Fire and Rescue Services that boarder the County will be consulted with under the terms of Sect 13 and 16 arrangements laid down within the Fire and Rescue Services Act 2004.</p>

## Equality analysis: Summary of what the evidence shows and how has it been used

This section will allow you to outline how the evidence has been used to show 'due regard' to the three aims of the general equality duty. It is important that this consideration is thorough and based on sufficient information. Consideration should be relevant and proportionate.

- Eliminate discrimination
- Advance equality of opportunity
- Promote good relations.

Protected group	Challenge or opportunity considered and what we did
<b>Age(A)</b>	Age is a major factor when considering vulnerability to fire and other sources of risk. GFRS has made the elderly and the young very much a focus of our prevention work. We have entered into valuable and effective partnerships with organisations such as Age Concern, GCC Adult and Social Care Teams and schools (engaging with children on fire prevention) to help us access those we need to protect, in a way that will encourage them to change their behaviour.
<b>Disability (D)</b>	Disability is a major factor when considering fire and other sources of risk. GFRS has been involved with directed prevention work in the homes of people with disabilities, for example we work with The Deaf Association to fit specialised smoke alarms designed for people who have a hearing impairment. We also safeguard the interests of people with disabilities away from their homes, our Protection Team ensure that employers and other commercial establishments fulfil their responsibilities to disabled employees and guests. Whilst being able-bodied is important in some aspects of delivering the services we provide, where that is not the case GFRS takes a positive approach to employing people with disabilities.
<b>Sex (S)</b>	Gender is not a major consideration in delivering the services we provide, service users are equally likely to be male or female. Our workforce are also of mixed gender, GFRS has one of the highest proportions of female firefighters in any UK Fire and Rescue Service.
<b>Race (including Gypsy and Traveller)</b>	Race is not a barrier to being a service user. Clearly where we undertake Prevention and Protection work in the community we are conscious of the need to be sensitive to cultural differences. The training given to staff undertaking home fire safety checks recognises the need to exercise sensitivity. Similarly race is not a barrier to employment with GFRS and we actively encourage and welcome applications from the diverse communities that can be found across the County.

<b>Gender reassignment (GR)</b>	<p>Gender re-assignment has no implication for whether a person could be a GFRS service user or employee.</p> <p>There are no known instances in which this has been a challenge.</p>
<b>Marriage and civil partnership (MCP)</b>	<p>Marriage or Civil Partnership have no implication upon whether a person could be a GFRS service user or employee.</p> <p>There are no known instances in which this has been a barrier.</p>
<b>Pregnancy and maternity (PM)</b>	<p>Pregnancy or maternity has no implication for whether a person could be a GFRS service user or employee. In an operational situation the normal process of prioritisation of casualties may be affected by pregnancy in the interests of protecting the mother and her unborn child.</p> <p>GFRS maternity policies correspond with GCC policies and current law. GFRS also has clear policy on the removal of an expectant mother from an operational role for the duration of her pregnancy in the interests of protecting the unborn child.</p>
<b>Religion and/or Belief (RAOB)</b>	<p>Religion or belief carry no implication for whether a person could be a GFRS service user or employee. Where possible religious observance is accommodated within working arrangements; some of GFRS' more recently developed sites having dedicated prayer facilities. The training given to staff undertaking home fire safety checks and relating to diversity in general recognises the need to exercise sensitivity in relation to religion and belief.</p>
<b>Sexual Orientation(SO)</b>	<p>Gender re-assignment has no implication for whether a person could be a GFRS service user or employee.</p> <p>As part of normal diversity training GFRS staff are made aware of the need to be sensitive in relation to sexual orientation. Support groups for people in same sex relationships are included in the prevention work undertaken by GFRS and as such, the service maintains a productive relationship with gay, lesbian, bi-sexual and trans-gender support groups.</p>

## Strengthening actions: Planning for further improvements

Please outline here what actions are required for further improvements to address challenges or opportunities, for example:

- Arrangements for continued/new engagement with stakeholders, staff, service users
- Plans to close data gaps across any of the protected characteristics through reviewed contract management arrangements
- Identify other plans already underway to address the challenges or opportunities identified in this statement
- Share findings with partner organisations.

If none, state 'none' below.

### Action Plan

Action	Who is accountable	Time frame
Consultation on draft IRMP with the public and other stakeholders.	Area Manager Clive Webber	October 2017 to January 2018
Continued consultation with our workforce in order to maintain good industrial relations and ensure any aspects that may affect those with protected characteristics are suitably addressed.	Area Manager Clive Webber	April 2018 to April 2021

### Monitoring and Review

Please indicate what processes/actions will be put in place to keep this 'activity' under review. For example will progress be monitored/ reported to a board, scrutiny committee, project board etc


As an integral element of the development of the Integrated Risk Management Plan 2018 – 21, the draft plan will be brought back to Cabinet with the outcomes of the stakeholder consultation prior to endorsement, publication and implementation.

As progress is made with development of IRMP Action Plans reports will be made to Cabinet and Environment and Communities Overview and Scrutiny Committee.

Any changes proposed under the IRMP that would have a significant impact on our workforce or local communities will invoke additional consultation with stakeholders to reach an acceptable resolution.

## Sign off and Scrutiny

By signing this statement off as complete you are confirming that 'you' have examined sufficient information across all the protected groups and used that information to show due regard to the three aims of the general duty. This has informed the development of the activity.

<b>Senior level sign off:</b>  <b>Stewart Edgar</b> <b>Chief Fire Officer and Operations Director: Gloucestershire Fire and Rescue Service</b> 	<b>Date:</b>  6 September 2017
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I am in agreement that sufficient information and analysis has been used to inform the development of this 'activity' and that any proposed improvement actions are appropriate and I confirm that I as the decision maker have been able to show due regard to the needs set out in section 149 of the Equality Act 2010.

<b>Name of relevant Portfolio Holder/Cabinet Member: Councillor Nigel Moor (Fire, Planning and Infrastructure)</b>	
<b>Signed by Portfolio Holder/Cabinet Member:</b>	<b>Date:</b>

## Publication

If this statement accompanies a Cabinet paper, it will be published as part of the Cabinet Report publication process. Statements accompanying Cabinet Reports are also published on our website. If this statement is not to be submitted with a Cabinet paper please maintain a copy for your own records that can be retrieved for internal review and also in case of future challenge.