

Equality Impact Analysis

on the North Wales Fire and Rescue Authority
Emergency Cover Review (ECR)



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Introduction

This report has been commissioned by North Wales Fire and Rescue Authority (NWFRAs) and sets out the Equality Impact Analysis (EIA) for the Emergency Cover Review (ECR).

The ECR relates to the way resources are managed to keep people safe and as part of this review North Wales Fire and Rescue Service (NWFRS) has been working with staff and representative bodies, members of the public, council representatives, local vulnerable groups and Members of NWFRAs to understand what really matters to everyone.

The focus of this report is to scope out the impact on the options presented during the public consultation of the ECR to support NWFRAs Members in their decision making on which option to request the Service to implement.

The overarching aim of the EIA is to establish whether there will be any specific groups or communities within North Wales who will be disadvantaged in any way in relation to the options consulted upon as part of the ECR.

As defined by the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011 (more information on this is in the next section of the report), this EIA will focus on the protected characteristics which fall within the Public Sector Equality Duty (PSED) and within the Socio-Economic Duty in Wales, as well as consideration of any possible implications on the Welsh Language, according to the requirements of the Welsh Language Standards.

Accompanying this EIA are two separate Equality Impact Assessments (EqIAs) contained in Appendix 2 and 3.

Background and Context of the Emergency Cover Review and Consultation

The key objective of the ECR was to consider current emergency response arrangements and to recommend options to provide a fair, sustainable and equitable emergency response across the whole of North Wales, balancing demand and current and anticipated future community risks.

The main reasons for conducting a review into emergency cover include:

- The fact that on-call firefighters, who operate the retained duty system (RDS), are not as available as they have been traditionally, and their recruitment is also proving challenging;

- The risks faced by North Wales communities are changing with climate change and new technology; and
- The financial challenges being faced are now greater than ever.

The Service currently has guaranteed emergency cover at eight fire stations, which are located predominantly along the A55 dual carriageway corridor in North Wales.

Elsewhere in the region, operational response is provided by on-call firefighters – and their availability during the daytime is challenging.

North Wales Fire and Rescue Service is working hard to recruit and retain these firefighters but there is a need to be certain of being able to provide a response crew within the optimum response times across the whole of North Wales.

The Service has therefore been exploring scenarios for providing emergency cover in the future – with a view to improve existing cover whilst also recognising the current financial challenges. Working with independent specialists, it has been modelling exactly how to optimise resources and respond in the most effective and efficient way.

The number of incidents attended increases throughout the day, peaking in early evening and then dropping at night. The Service looked at matching this demand by changing the way some of its crews work in certain areas.

The ECR aimed to enable the Service to respond more effectively to all the emergencies, including road traffic collisions and events due to extreme weather, and crucially to respond at the right time.

The ECR has been overseen by a member led Emergency Cover Review Working Group. The membership consisted of six NWFRA Members, one from each constituent local authority.

An independent company, ORH, was commissioned to work with the ECR team. ORH are industry experts and provide data analytics to a range of organisations working in the emergency sector. They have provided technical support in relation to data analysis and modelling to critique current emergency cover arrangements and to identify the optimum locations of any additional day staffed stations.

Through their deliberations Members discounted two options:

- To continue with existing emergency cover arrangements, accept the daytime availability risk and to no longer put in place the daily relocation of firefighters to mitigate those risks.

- To continue with the existing emergency cover arrangements and introduce three additional day staffed stations at an extra additional cost of £2.25 million.

In summary, the existing status quo was rejected because of the inequality of response service across North Wales, the risks involved to firefighters and to the public, and the costs involved.

Members indicated that they wished to consult on those options which seek to meet the aims of the ECR by reallocating existing firefighters to new day staffed stations. The options were presented as follows:

Option 1: This would mean that the 12 rural firefighter posts and 28 wholetime firefighter posts from Rhyl and Deeside station would be reallocated to the three new day staffed stations. Cover for Rhyl and Deeside would change to a day crewed model similar to the model which currently operates at Colwyn Bay, Llandudno, Bangor, Caernarfon and Holyhead. This will continue to be in addition to the existing RDS firefighters who crew the second fire engine at all these stations.

Option 2: An alternative model which provides an improved emergency cover by introducing three new day staffed stations, but also realises savings of £1.1 million towards the increase in 2024/25 budget, currently estimated at £6 million thus limiting the year-on-year increase to £4.9m. This option changes the crewing model at Rhyl and Deeside to a day staffed model, which leaves the night-time cover to be provided solely by the RDS firefighters and removes the third appliance from Wrexham. In total this sees a reduction in 22 wholetime firefighter posts.

Option 3: Changes are in line with Option 2, however, only two day staffed stations are introduced and the closure of five RDS fire stations is included. This is a reduction of 36 wholetime and 38 RDS firefighter posts realises savings of £2.4m thus limiting the year-on-year cost increase to £3.6m. It was noted that Option 3 does not have the professional support of the Chief Fire Officer. This is because it does not improve emergency cover, reducing the number of households in North Wales who are able to receive a response within 20 minutes by 2,087.

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Option 3 also removes 74 firefighter posts which would reduce the capacity of the Service to deal with spate conditions and with major incidents. In

addition, any possible merger of RDS fire stations can only be considered in the future when the three additional day staffed stations are in place and providing guaranteed day time emergency cover.

The Authority is obliged to consult the public when considering major service change under a variety of legal obligations including the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011, the Wellbeing of Future Generations Act 2015, the Welsh Language (Wales) Measure 2011 and common law.

In April 2023, the Service engaged The Consultation Institute (tCI), a not for profit, well-established institute promoting best practice public and stakeholder consultation in the public, private and voluntary sectors. They have previously worked across the sector including Mid and West Wales Fire and Rescue Authority.

The Institute provided Certificate of Consultation Readiness which certifies that the Authority had appropriately prepared for public consultation in line with the requirements of the tCI Consultation Charter. The Service subsequently commissioned tCI to provide Quality Assurance to ensure that the public consultation met the required standards expected.

Following approval from Members, a public consultation commenced on 21 July and continued until 30 September 2023. The results of the consultation were then presented at the NWFRA meeting on 16 October 2023.

Equality Impact Analysis: The Legal Context

The Public Sector Equality Duty (PSED) is part of the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011 and came into force in April 2011. Section 149 of the Equality Act sets out the main duty and states that authorities must, in the exercise of their functions, “have due regards to the need to” eliminate any conduct that is prohibited by the Act. This includes discrimination, harassment and victimisation related to the ‘Protected Characteristics’;

- Age
- Disability
- Gender reassignment
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

Whilst 'marriage and civil partnership' is also a protected characteristic, under the Equality Act 2010, it is not covered by the PSED in the same manner as the other protected characteristics, listed above and is for the purposes of the duty to eliminate discrimination. It is important to note that Section 1 of the Equality Act 'Socio-economic duty' came into force in Wales on 31st March 2021, and this requires the same due regard as the nine protected characteristics listed above.

The Welsh Language (Wales) Measure 2011 is also another legal consideration which has been included in the EIA. In compliance with the Policy Making standards within the Service's Welsh Language Standards compliance notice, it states that consideration should be made of any effects, whether positive or adverse to the Welsh Language. The EIA must include any identifiable effects on the opportunities for persons to use the Welsh language and treating the Welsh language no less favourably than the English language.

The PSED has three main facets, and these are to:

1. Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
2. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
3. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Having due regard to the need to 'advance equality of opportunity' between those who share a protected characteristic and those who do not includes having due regard to the need to remove or minimise disadvantages suffered by them. Having due regard also means public organisations, such as NWFRS, take measures to meet the needs of such persons where those needs are different from persons who do not have that characteristic, and encourage those who have a protected characteristic to participate in public life.

As an essential part of meeting their PSED, public authorities conduct Equality Impact Analysis. This will be documented through the completion of an Equality Impact Assessment (EqIA). An Equality Impact Analysis is an assessment of a proposed organisational policy, or a change to an existing one so that it can be determined whether the policy has a disparate impact on persons from the protected characteristics. Whilst there is no longer a prescriptive way of doing this case law has provided guidance in how to undertake an equality impact analysis, namely:

- Ensure there is a written record of the equality considerations that are taken into account;

- Ensure any decision-making included consideration of the actions that would help to avoid or mitigate any negative impacts on particular equality groups;
- Ensure the decisions made are done so on evidence; and
- Ensure the decision-making process is transparent.

Methodology

Underpinned by the three main facets of the PSED (listed earlier), the EIA sets out information to support NWFRA Members in their decision making on the ECR option to implement.

This report and the accompanying EqlAs (Appendix 2 and 3) focus on the equality related findings of the pre-consultation and full public consultation conducted by NWFRA between 21 July and 30 September 2023.

This EIA draws together the detail around engagement and consultation activity; the demographics of the NWFRA area, with specific reference to protected characteristics; the anticipated differential impact when looking at the three potential options, specifically in terms of equality; any mitigating factors which will help to manage any risks associated with the impact. Although this report concludes with recommendations it must be noted that equality impact assessment process will continue through implementation.

The NWFRA undertook primary data collection throughout the consultation which has fed directly into this EIA. This is set out in the section of this report on engagement and consultation.

The review of data formed part of the methodology as follows:

Function within methodology	Information or data reviewed, or method
Understanding of how inequalities are manifest in the lives of people bearing protected characteristics (as relevant to the proposed options).	Based on a combined experience of over 16 years in the field of equalities. Review of Biennial report of the Equality and Human Rights Commission, which highlight inequalities for protected characteristics.
Understanding of the distribution of protected characteristics across North Wales, to inform the	Interrogation of the Instant Atlas data for North Wales Fire and Rescue Authority area.

assessment of the impact of ECR Options.	Desk based research into existing published sources.
Interrogate feedback expressed by internal and external stakeholders about the options contained within the ECR consultation options to determine any variations by protected characteristics.	Full Equality Impact Assessment completed by Equality and Diversity and Inclusion Officer. This process assessed the potential impact on internal and external stakeholders separately.
Review case law to identify learning to inform this methodology, to learn from the experiences of similar organisations undertaking reviews of service provisions.	Cases identified via the Consultation Institute.
Use of key lines of enquiry with the consultation questionnaire to determine if the options presented would have a detrimental impact on one or more protected characteristic.	<ul style="list-style-type: none"> • Do you feel there are any other risks we should be considering or planning for? A free text question that would allow for equality concerns to be raised. • Are there any other criteria that you think should be included? Following the evaluation criteria, a free text question that would allow any further criteria regarding equalities to be raised. • We have undertaken an equality impact assessment to ensure our decision-making process is fair and does not present barriers to taking part or disadvantage anyone, especially protected groups. • Are there any other equality issues that we could be thinking about? A specific question to draw out equalities' issues. • Are there any other areas of emergency cover that you would like us to consider? A free text question that would

	allow for equality concerns to be raised.
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Table 1: Methodology and sources of data and information

Case Law

To date there are three cases in law which have shaped the way EIA need to be carried out. The first is **R (Brown) v Secretary of State for Work and Pensions [2008]** , the second; **Branwood v Rochdale Metropolitan Borough Council [2013]** and the third; **R (Bracking & others) v Secretary of State for Work & Pensions [2013]**.

The Brown case is a well-known case, which was important solely for its ruling on Impact Assessments and the promulgation of the six ‘general principles’. These are:

- **Knowledge** – Those in the public authority who have to take decisions must be made aware of their duty to have due regard to the need to eliminate unlawful discrimination, advance equality and foster good relationships across all protected characteristics.
- **Proportionality** – A higher or lower level of “due regard” must be exercised, depending on volume and severity.
- **Consultation** – This must be timely, based on giving clear information and asking the right questions.
- **Timeliness** – “Due regard” must be exercised before and at the time the policy is being considered.
- **Sufficient information** – All relevant factors must be taken into account, so in other words the decision must be exercised in substance, with rigour and an open mind.
- **Real consideration** – Considering the duty in substance, with rigour and an open mind; it is not a question of ‘ticking boxes’.
- **No delegation** – The duty will always remain the responsibility of the public body subject to the duty.

The judge in the Branwood case sought to supplement and update the ‘Brown Principles’ and in the Bracking case the judge set out another set of Principles, some of these confirmed the “Brown Principles”. As the case of Brown was heard in the High Court and Bracking in the Supreme Court, Bracking has primacy and therefore the Bracking Principles are the legal tests which will be used in judicial review.

North Wales Fire and Rescue Authority Area and Service Demographics

North Wales has a population of circa 687,000 people spread over a geographical area of 2383 square miles (or 6,172 square kilometres). The region is made up of six counties which include Conwy, Denbighshire, Flintshire, Gwynedd, Ynys Mon, and Wrexham. It encompasses a diverse landscape, including Eryri National Park, coastal areas, and rural communities. The region is well connected, with major highways, railways, and ports providing access to the rest of the UK and Europe.

The largest city in North Wales is Wrexham, which serves as a hub for commerce and industry, while other major conurbations include Bangor, Caernarfon, Colwyn Bay, Deeside, Llandudno and Rhyl.

The region is also home to several universities and colleges, providing a strong talent pool for local and international businesses that are located here. Additionally, the region is a popular tourist destination, attracting visitors from all over the world with its stunning coastline, rich history, and unique culture.

Welsh, as a language for living, remains at the heart of the modern Welsh identity. Enjoying family life, education, work and leisure all through the medium of Welsh is testimony to the importance of the language to the people of Wales.

With regards to the 687,000 people that reside in North Wales, the 2021 Census data¹ states that 22.3% of the population were aged 65 years and over. Out of all local authorities across Wales, Conwy (27.4%) and Anglesey (26.4%) have the highest percentages of people aged 65 years and over. Conwy (1.5%) has the highest percentage of people aged 90 years in Wales.

With intersectionality in mind, it is useful to explore disability and age due to a notable difference in the data between 2011 and 2021, particularly in the younger and older age groups². For females aged 15 to 19 years, the

¹ Office of National Statistics (2021) Population and household estimates, Wales: Census 2021, Found at:

www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/populationandhouseholdestimateswales/census2021#local-authority-populations-in-wales

² Office for National Statistics (2023b) Disability by Age, sex and deprivation, England and Wales: Census 2021. Found at:

www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/articles/disabilitybyagesexanddeprivationenglandandwales/census2021#:~:text=Source%3A%20Office%20for%20National%20Statistics%20-%20Census%202021,-

percentage of disability was 13.3% in 2021, 8.1 percentage points higher than in 2011 and 7.9 percentage points higher than in 2001. This trend continued into the 20 to 24 year age group, where disability prevalence increased substantially, from 6.2% in 2011 to 17.9% in 2021. For males, the increased prevalence of disability in 2021 began at earlier ages; 8.6% of males aged 5 to 9 years were disabled in 2021, compared with 5.6% in 2011 and 6.5% in 2001³.

The population of North Wales is much less ethnically diverse than across England and Wales as a whole and 96.8% of the population identified as “White” in the 2021 Census. In North Wales, the highest proportions of people from “Any other White background” in 2021 were in Wrexham (4.8%) and Flintshire (3.9%) and the lowest found in Anglesey (1.9%)⁴.

Age

The age of an individual, when accompanied with additional factors such as other ‘protected characteristics’ may affect their access to public services. Individuals may also experience discrimination and inequalities because of their age.

The European Social Survey 2012 found that age discrimination was the most common form of prejudice experienced in the UK, with 28% of respondents saying they had experienced prejudice based on age. In this section the age category to which most attention is given is 65+, as this is the age band that faces the most age-based discrimination.

Analysis of the 2021 Census data shows that North Wales residents aged 65 or over were more likely than those under 65 to:

- Have a long-term limiting illness;
- Be in poor health;
- Be living on their own;

[Embed%20code&text=In%20Wales%2C%2022.3%25%20of%20females,10.4%25%20and%209.5%25%20respectively](#)

³ Office for National Statistics (2023b) Disability by Age, sex and deprivation, England and Wales: Census 2021. Found at:

www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/articles/disabilitybyagesexanddeprivationenglandandwales/census2021#:~:text=Source%3A%20Office%20for%20National%20Statistics%20-%20Census%202021,-

[Embed%20code&text=In%20Wales%2C%2022.3%25%20of%20females,10.4%25%20and%209.5%25%20respectively](#)

⁴ Welsh Government (2022) Ethnic group, national identity, language and religion in Wales - Census 2021, Found at: <https://www.gov.wales/ethnic-group-national-identity-language-and-religion-wales-census-2021-html#:~:text=90.6%25%20of%20the%20population%20identified,to%202.3%25%20in%202011>)

- Be without access to a car;
- Be providing unpaid care of 50 hours or more a week;
- Be living in a household without central heating.

People aged 50 or over were more likely than those under 50 to:

- Be living on their own;
- Be isolated and excluded;
- Be providing unpaid care; and
- Have no qualifications.

The ageing population will have financial and resource implications, as this will likely to be the age at which the health and social care needs of individuals will increase.

Disability

Under the Equality Act 2010, a person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities. This is consistent with the Census definition of a limiting long-term health problem.

According to 2021 Census data, North Wales has 20.7% of the total population reporting a disability and/or long-term health condition. The national average in Wales is 21.1% and for comparison purposes 17.7% in England⁵.

Disability and age are closely related, with older people being more likely to be disabled. In North Wales, Census 2021 data shows that the age group with the highest proportion of people with below average health are those aged 65 and over (12.5%), with the lowest proportion in those aged 15 years and under (0.5%). This was seen in all local authorities with some minor variation in the percentages.

In North Wales, the highest percentage within the population aged 17 years or under with below average health were aged 16 to 17 years (1.2% of this population), and the lowest percentage in North Wales was in those aged 2 years and under (0.3% of this population). There was some variation in the local authorities although the highest percentage was in those aged 16 to 17 years in all local authorities except Denbighshire where the highest percentage was in those aged 15 years (1.7% of this population). It is not

⁵ Office for National Statistics (2023c) Disability, England and Wales: Census 2021. Found at: [www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandwellbeing/bulletins/disabilityenglandandwales/census2021#:~:text=In%20Wales%2C%20in%202021%2C%20a,\(23.4%25%2C%20696%2C000\)](https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandwellbeing/bulletins/disabilityenglandandwales/census2021#:~:text=In%20Wales%2C%20in%202021%2C%20a,(23.4%25%2C%20696%2C000))

possible to compare this data with the data included in the previous report as an alternative data source was used.

Gender

According to the Census 2021 data, the North Wales population by gender is 51% female and 49% male. When combined with additional factors such as living alone, employment status, financial income, health and social care needs, research suggests that one's gender can have disproportionate outcomes.

People are disproportionately affected by their gender when different concepts are explored which include Hate crime and domestic abuse⁶, gender pay gap and financial income⁷, accessing health care⁸, mental health⁹, domestic abuse¹⁰ and individuals may also experience discrimination and inequalities because of their gender¹¹.

Sexual Orientation

Sexual orientation is an umbrella term covering sexual identity, attraction, and behaviour. According to Stonewall¹², approximately 7% of people identify as having a sexual orientation that involves being attracted to people of more than one gender.

According to the Census 2021¹³, 89.4% of the Welsh population identify as heterosexual or straight, 7.6% of the population 'did not answer', with 3% of the population identifying as Gay, Lesbian, Bisexual or 'other'.

⁶ Stop Hate (2023) Gender Based Hate Crime, Found at www.stophateuk.org/about-hate-crime/gender-based-hate-crime/

⁷ ONS (2022) Gender Pay Gap 2022, Found at www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/bulletins/genderpaygapintheuk/2022

⁸ WHO (2023) Gender and Health, Found at www.who.int/news-room/questions-and-answers/item/gender-and-health

⁹ Mental Health Foundation (2023) Men and Mental Health, Found at www.mentalhealth.org.uk/explore-mental-health/a-z-topics/men-and-mental-health

¹⁰ ONS (2021) Domestic Abuse Victims, Found at www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/domesticabusevictimcharacteristicsenglandandwales/yearendingmarch2022

¹¹ CIPD (2023) Gender Equality Work, Found at www.cipd.org/uk/views-and-insights/cipd-viewpoint/gender-equality-work/

¹² Stonewall (2022) Rainbow Britain Report, Found at: www.stonewall.org.uk/system/files/rainbow_britain_report.pdf

¹³ ONS (2021) Sexual Orientation, Age and Sex in England and Wales, Found at: www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/articles/sexualorientationageandsexenglandandwales/census2021

Research investigating people's experience of accessing public services has found that people that identify as Gay, Lesbian, Bisexual or an orientation other than heterosexual, often involves inequality and restricted access. Although there is very limited research on fire and rescue services, restricted access has been highlighted in various public services including health care¹⁴ and Police and Local authorities¹⁵.

Gender Reassignment

Gender reassignment is defined by the Equality Act 2010 as a person who is proposing to undergo, is undergoing or has undergone a process (or part of a process) for the purpose of reassigning their sex by changing physiological or other attributes of sex. This means an individual does not need to have undergone any treatment or surgery to be protected by law.

Evidence shows that when transgender (41%) and/or non-binary (31%) people reveal their gender variance, they are exposed to a risk of discrimination, bullying and hate crime¹⁶.

67% of transgender people and 70% of non-binary people had experienced depression in the past year¹⁷. Almost half of the people who identified as transgender (46%) thought about taking their own life in the past year; 60% thought their life was not worth living; and 12% had made a suicide attempt.

By comparison, it is estimated that around 20% of the general population experience suicidal feelings in their lifetime¹⁸ and around 13% self-harm¹⁹. Therefore, transgender and non-binary people are at a much greater risk of a range of suicidal experiences, as they face mental health problems and

¹⁴ Stonewall (2018) LGBT+ in Britain Report 2018, Found at:

www.stonewall.org.uk/system/files/lgbt_in_britain_health.pdf

¹⁵ Stonewall (2017) LGBT+ in Britain: Hate Crime, Found at:

www.stonewall.org.uk/system/files/lgbt_in_britain_hate_crime.pdf

¹⁶ Stonewall (2018) LGBT+ in Britain: Trans Report, Found at:

www.stonewall.org.uk/system/files/lgbt_in_britain_-_trans_report_final.pdf

¹⁷ Manchester University (2018) Found at:

<https://sites.manchester.ac.uk/carms/2020/06/17/gender-identity-why-are-transgender-and-non-binary-people-more-at-risk-of-suicide/>

¹⁸ Time To Change (2020). Suicidal feelings, Found at: <https://www.time-to-change.org.uk/about-mental-health/types-problems/suicidal-feelings#toc-2>

¹⁹ Selfharm UK (2020) Self-harm statistics, Found at: <https://www.selfharm.co.uk/get-information/the-facts/self-harm-statistics>

suicidal experiences at significantly higher rates than the general population, especially amongst younger people^{20,21}.

Research has also found that trans and/or non-binary people encounter significant difficulties in accessing and using health and social care services due to staffs' lack of knowledge and understanding and sometimes prejudice²².

Research carried out by Stonewall²³ found that a quarter of health and social care staff were not confident in their ability to respond to the specific care needs of trans and/or non-binary people patients and service users.

An increasing number of trans people are accessing Gender Identity Clinics; it is unclear if this represents an increase in the trans population or an increasing proportion of the trans population accessing Gender Identity Services²⁴.

Whilst there are no official estimates of gender reassignment at either national or regional level, Stonewall estimates²⁵ that around 1% of the population identify as trans, including people identifying as non-binary. Therefore, a logical estimation would suggest between 6,000 and 7,000 people in North Wales are experiencing some degree of gender variance.

Pregnancy and Maternity

The Equality Act 2010 protects people who are pregnant, have given birth in the last 26 weeks (non-work context) or are on maternity leave (work context) against discrimination in relation to their pregnancy.

In the past 20 years, North Wales range between 7,086 and 7,826 live births each year. Over this period, the largest proportions of these deliveries were in the 25 to 29-year-old age group. The second largest proportion of births were

²⁰ Stonewall (2017) School Report, Found at: www.stonewall.org.uk/resources/school-report-2017

²¹ Transgender Trend (2016) The Suicide Myth, Found at: www.transgendertrend.com/the-suicide-myth/

²² Royal College of Nursing (2020) Fair Care for Trans and Non-Binary, Found at: www.rcn.org.uk/Professional-Development/publications/rcn-fair-care-trans-non-binary-uk-pub-009430

²³ Stonewall (2018) LGBT+ in Britain: Trans Report, Found at: www.stonewall.org.uk/system/files/lgbt_in_britain_-_trans_report_final.pdf

²⁴ LGBT Foundation (2017) Transforming Outcomes A review of the needs and assets of the trans community, Found at: <https://dx.fy8lrzbp.ywr.cloudfront.net/Files/acd2bcc5-a2d4-4203-8e22-aed9f4843921/TransformingOutcomesLGBTFdn.pdf>

²⁵ University of Bristol (2018) Ensuring trans people in Wales receive dignified and inclusive health and social care in later life: The Trans Ageing and Care (TrAC) project, 2016-18, Found at: www.bristol.ac.uk/policybristol/policy-briefings/trans-ageing-and-care-project/

in the 30 to 34-year-old group, whereas the over 40's group were the lowest. Over the past two decades, teenage births have made up between 4.7% to 9.6% of overall births in North Wales each year. With exception of the occasional year, teenage births have reduced year-on-year since 2003.

Race

The Equality Act 2010 states that race includes colour, nationality, ethnic or national origin. 96.8% of people in North Wales identify as White Welsh/British. Asian or Asian Welsh/British was the second largest ethnic group (1.4%), followed by mixed or multiple ethnic groups (1.1%), other ethnic group (0.4%) and Black, British Welsh/British, Caribbean or African (0.3%).

The population of North Wales is much less ethnically diverse than across England and Wales as a whole and 96.8% of the population identified as "White" in the 2021 Census. In North Wales, the highest proportions of people from "Any other White background" in 2021 were in Wrexham (4.8%) and Flintshire (3.9%) and the lowest found in Anglesey (1.9%).

The COVID-19 pandemic had a disproportionate impact on people from ethnic minority communities and recently the Welsh Government²⁶ highlighted that highlighted many people, including those who were born in Wales, still experience racism on a regular basis.

An Equality and Human Rights Commission report²⁷ from 2016 highlighted various issues that are still relevant in 2023 for people from ethnic minority groups that continue to experience discrimination and inequality in education, employment, housing, pay and living standards, health, and the criminal justice system.

Amongst people aged 65 and over, Asian/Asian British people and Black African/Caribbean/Black British people were more likely than people from other ethnic backgrounds to have a long-term limiting illness and to be in poor health.

People of Gypsy or Irish Traveller origin were considerably more likely to be in poor health compared with all other ethnic groups (15.9% of Gypsy/Irish Travellers compared with 4.6% of White British people). Gypsies and Travellers

²⁶ Welsh Government (2022) Anti-Racism Action Plan, Found at: www.gov.wales/sites/default/files/publications/2022-06/an-introduction-to-an-anti-racist-wales.pdf

²⁷ Equality and Human Rights Commission (2016) Healing a divided Britain, Found at: www.equalityhumanrights.com/sites/default/files/2021/healing-a-divided-britain-august-2016.pdf

are still regarded as having the poorest health and lowest life expectancy in the UK.

Households headed by people from 'other White', mixed/multiple, Asian/Asian British, Black African/Caribbean/Black British and 'other' ethnic backgrounds were all more likely than households headed by people from White British backgrounds to have fewer bedrooms than was required.

People from mixed/multiple and Black African/Caribbean/Black British backgrounds were more likely than other ethnic groups to live in social housing.

People from White British and White Irish backgrounds were less likely than other ethnic groups to be living in private rented housing.

People from all groups which were not White British were more likely than White British people to be living in a household without access to a car or van.

Amongst people aged 25-34, people from White backgrounds were less likely to be unemployed than people from Black and Minority ethnic backgrounds.

Amongst people aged 25-34, people from White Irish and Asian/Asian British backgrounds were more likely to have level 4 qualifications (a degree or higher) than White British people, whilst people from Black African/Caribbean/Black British, 'other' White, and 'other' ethnic backgrounds were less likely than White British people to have this level of qualification.

Amongst people aged 16-24, people from mixed multiple, White Irish, 'other' White and 'other' ethnic backgrounds were all more likely than people from White British backgrounds to have no qualifications. In the same age group, people from Asian/Asian British backgrounds were less likely than White British people to have no qualifications. The percentage of people in this age group with no qualifications was similar for Black African/Caribbean/Black British people and White British people.

Amongst people aged 25-49, people from White Irish, White British and 'other' White backgrounds were less likely to be unemployed than people from Black and Minority ethnic backgrounds.

Amongst people aged 25-49, White Irish and Asian/Asian British people were more likely to be in higher managerial, administrative and professional occupations than White British people, whilst people from Black African/Caribbean/Black British, 'other' White, mixed/multiple, and 'other'

ethnic backgrounds were less likely than White British people to be in such occupations.

Religion and/or Belief

According to the 2021 Census²⁸, Christianity is the most common religion within all ages in North Wales and represents 49.8% of the population. Whilst the next main group stated they had no religion at 41.7%, statistics show 1.8% of the population account for people who follow Buddhist, Hindu, Jewish, Muslim and Sikh religions. 6.7% of people chose not to state their religion or belief.

In summary, North Wales has a higher proportion of people who are Christian, have no religion, or have not stated a religion than the national figures. In contrast it has a lower proportion of people who follow a religion other than Christianity, which reflects the ethnic composition of the religion.

Marriage and Civil Partnership

As mentioned earlier in the report, marriage and civil partnership do not fall under the PSED in the same way as the other protected characteristics, however the Equality Act 2010 does protect individuals who are in a civil partnership, or marriage, against discrimination. The Service has considered this protected characteristic in the same way, mainly because a person's relationship status is one of the many factors that may place them at more 'risk' of fire in the home. For example, if people live alone, they are more at risk of experiencing fire in the home. People aged 65 and over that live alone are at even further risk.

Evidence suggests being married is associated with better mental health²⁹, and physical health³⁰. There is less evidence on the benefits of being in a civil partnership, but it is likely the benefits will also be experienced by people in similarly committed relationship such as civil partnerships. Where heterosexual couples differ from couples in same-sex relationships and civil partnerships, they experience hate crime, discrimination, and victimisation because of

²⁸ Office for National Statistics (2021) Religion, England and Wales: Census 2021 Found at: www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/religion/bulletins/religionenglandandwales/census2021

²⁹ Kiecolt-Glaser, J. K. & Newton, T. L. (2001) Marriage and health: his and hers. Psychological bulletin, Vol 127(4), 472.

³⁰ Johnson, D.R. & Wu, J. (2002) An empirical test of crisis, social selection, and role explanations of the relationship between marital disruption and psychological distress: A pooled time-series analysis of four-wave panel data. Journal of marriage and family, Vol 64(1), 211-224.

their sexual orientation³¹ and this is likely to negatively impact on their mental wellbeing and sense of safety. This may also relate to a lack of public recognition and a consistent social framework on which such relationships can be built³².

Across older age groups, both men and women living as a couple were more likely to be in very good or good health compared to those not living as a couple, regardless of whether those not living as a couple lived with other people³³.

As you would expect, people aged 16-24 are the most likely to be single, while those aged 65+ are the most likely age group to be widowed or a surviving partner from a same sex civil partnership³⁴. Same sex civil partnerships are most common amongst 35-49-year-olds, where they account for 0.2% of the total age group. The proportion of people that are married, separated or divorced increases with age, until 65+ when it begins to fall, to consider the increasing proportion of people who have lost a partner.

Welsh Language Considerations

According to the 2021 Census³⁵, significantly, the highest percentages of Welsh speakers in Wales can be found in the North Wales counties of Gwynedd (64.4%) and Anglesey (55.8%). North Wales as a region is home to over a third of Wales' Welsh speaking population.

The Service is committed to promoting and facilitating the use of Welsh as a language of the workplace and community, and reports on this annually as required under the Welsh Language (Wales) Measure (2011). Alongside this, the Service supports the Welsh Government's 'Cymraeg 2050' Welsh language strategy with the target of a million Welsh speakers by 2050 (Welsh Government, 2017). The strategy aims to increase both the number of Welsh

³¹ King et al (2003) Mental health and quality of life of gay men and lesbians in England and Wales: controlled, cross-sectional study. *The British Journal of Psychiatry*, Vol 183(6), 552-558.

³² King, M. & Barlett, A. (2006) What same sex civil partnerships may mean for health
Found at: www.ncbi.nlm.nih.gov/pmc/articles/PMC2465551/

³³ Office of National Statistics (2021) People Population and Community, Found at: www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/ageing/articles/profileoftheolderpopulationlivinginenglandandwalesin2021andchangessince2011/2023-04-03

³⁴ Office of National Statistics (2021) People Population and Community, Found at: www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/ageing/articles/profileoftheolderpopulationlivinginenglandandwalesin2021andchangessince2011/2023-04-03

³⁵ Welsh Government (2022) Welsh Language in Wales, Found at: www.gov.wales/welsh-language-wales-census-2021-html

language speakers and to create favourable conditions for this to happen, including increasing the use of Welsh within the workplace across all sectors.

More information is published in the Equalities and Human Rights Commission monitoring report [here](#).

Socio-economic Considerations

The Service area demographics are outlined earlier in this report on page 10.

According to the Census 2021, some of the most deprived areas in Wales are concentrated in North Wales coastal and border towns^{36,37}. These areas include Rhyl and Kinmel Bay. In Rhyl South West, around 70% of households are affected by deprivation according to the map. Other areas, such as Abergele, Denbigh West and Gronant also have some high rates of deprivation, at around 60%. Around 50% of homes are affected by at least one type of deprivation in St Asaph, Dyserth and Mostyn. Caia Park Community in Wrexham lies within the 10 most deprived areas for the income, education and community safety domains. Other deprived areas include coastal communities across Flintshire such as Deeside, Delyn and Alyn. Comprehensive engagement was conducted in these deprived areas and a full breakdown is provided in full consultation report.

North Wales (14.4%) has the highest proportion of young people (aged 16 to 24) who are Not in Employment, Education or Training (NEET), when compared to 13.1% in South Wales who have the lowest³⁸. With intersectionality in mind, 55.8% (26,600) of males aged 16 to 24 years old were NEET, compared to 44.2% (21,100) of females aged 16 to 24. Disabled young people are more likely to be NEET than young people that are not disabled and the proportion of disabled people who are NEET rises from 18.1% at age 16 to 18 to 41.2% at age 19 to 24³⁹.

³⁶ Welsh Government (2022) Analysis of population characteristics by area deprivation (Census 2021), Found at: www.gov.wales/analysis-population-characteristics-area-deprivation-census-2021-html

³⁷ Welsh Government (2021) Young people not in education, employment or training (NEET): April 2020 to March 2021. Found at: www.gov.wales/sites/default/files/pdf-versions/2021/9/2/1632824878/young-people-not-education-employment-or-training-neet-april-2020-march-2021.pdf

³⁸ Welsh Government (2023) Participation of young people in education and the labour market: 2021 and 2022 (provisional), Found at: www.gov.wales/participation-young-people-education-and-labour-market-2021-and-2022-provisional-html

³⁹ Welsh Government (2022) Young people not in education, employment or training (NEET): April 2020 to March 2021, Found at: www.gov.wales/young-people-not-education-employment-or-training-neet-april-2020-march-2021-html

The employment rate for people aged 16 to 64 in Wales was 73.0% in the year ending March 2023, down 0.6 percentage points on the previous year⁴⁰.

Unemployment rates differ across North Wales with Gwynedd (26.4%), Denbighshire (26.1%), Conwy (24.2%), Anglesey (22.6%) (Wrexham (22.1%) and Flintshire (21.3%)⁴¹.

Employment (or working) does not preclude experiencing poverty and deprivation. Low-paid work is the biggest contributor to in-work poverty as it makes it very difficult to escape poverty, mainly because some people don't get paid enough or there are not many well-paying jobs in a particular area⁴². Pay gaps and in-work poverty affect certain groups much more than others and the risk of in-work poverty is greater for disabled and ethnic minority workers⁴³.

In terms of health, a household is classified as deprived if any person in the household has general health that is bad or very bad or is identified as disabled⁴⁴. A breakdown of disability can be found in the relevant section on page 12, it is worth noting that 21.1% of the North Wales population have a disability and/or long-term health condition⁴⁵. Although, Gwynedd (18.1%) is one of the local authorities with the lowest proportion of disabled people in Wales, the average percentage of disabled people across the region is higher than other parts of the UK. With intersectionality in mind, 22.3% of females and 19.8% of males were disabled. The percentage of those who were limited a little was 11.9% for females and 10.3% for males. A higher proportion of females than males indicated that they were limited a lot; 10.4% and 9.5% respectively⁴⁶.

⁴⁰ Welsh Government (2023) Labour market statistics (Annual Population Survey): April 2022 to March 2023. Found at: www.gov.wales/labour-market-statistics-annual-population-survey-april-2022-march-2023.html

⁴¹ Welsh Government (2023) Labour market statistics (Annual Population Survey): April 2022 to March 2023. Found at: www.gov.wales/labour-market-statistics-annual-population-survey-april-2022-march-2023.html

⁴² Joseph Rowntree Foundation (2020) UK Poverty Report 2019/20. Found at: www.jrf.org.uk/report/uk-poverty-2019-20

⁴³ Welsh Government (2019) Most children in poverty living in working households. Found at: www.gov.wales/most-children-poverty-living-working-households-new-report

⁴⁴ Office of National Statistics (2021) Household deprivation variable: Census 2021, Found at: www.ons.gov.uk/census/census2021dictionary/variablesbytopic/demographyvariables/census2021/householddeprivation#:~:text=A%20household%20is%20classified%20as%20deprived%20in%20the%20health%20dimension,or%20illnesses%20are%20considered%20disabled

⁴⁵ Welsh Government (2023) Health disability and provision unpaid care Wales Census 2021, Found at: www.gov.wales/health-disability-and-provision-unpaid-care-wales-census-2021.html

⁴⁶ Office of National Statistics (2021) Disability by age, sex and deprivation, England and Wales: Census 2021, Found at:

With intersectionality in mind, there is a direct link between the cost-of-living crisis and health with 60% of people in Wales saying that their health has worsened due to rising costs⁴⁷.

Life expectancy is an important consideration when exploring living standards and health. In Wales, life expectancy at birth was 82 years for women and 78 years for men for 2018-20⁴⁸. This was a slight reduction for both males and females, following higher death rates in 2020 during the COVID-19 pandemic. Healthy life expectancy was 62 years for females and 61 years for males in 2018 to 2020.

Welsh Government statistics⁴⁹ suggest the highest life expectancy for women in North Wales was 83.1 years in Conwy and Gwynedd, while in men it was Gwynedd (79.5). The lowest life expectancy for women in North Wales was in Denbighshire (81.1) and in men it was Denbighshire and Wrexham (78.3).

Pre-consultation Engagement Activity

A key element of the consultation process is that of pre-consultation. This included focus groups with a range of stakeholders including blue light partners, community groups, local authorities, staff and representative bodies. The purpose of pre-consultation was to gain a wider insight and understanding to inform the decision making and to shape the full consultation.

During pre-consultation a variety of different scenarios were explored through a series of workshops, seminars and focus groups, during which insights and feedback from a wide range of people were gathered to inform the Authority decision making process.

Key themes arising from this engagement included:

- Finance – Understanding the budgetary pressures.

www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/articles/disabilitybyagesexanddeprivationenglandandwales/census2021

⁴⁷ National Health Service (2022) 60 per cent of people in Wales say their health has worsened due to rising cost of living. Found at: www.nhsconfed.org/news/60-cent-people-wales-say-their-health-has-worsened-due-rising-cost-living

⁴⁸ Welsh Government (2022c) Wellbeing of Wales, 2022. Found at: www.gov.wales/wellbeing-wales-2022-healthier-wales-

[html#:~:text=Life%20expectancy%20at%20birth%20was,males%20in%202018%20to%202020](https://www.gov.wales/wellbeing-wales-2022-healthier-wales-)

⁴⁹ Welsh Government (2022c) Wellbeing of Wales, 2022. Found at: www.gov.wales/wellbeing-wales-2022-healthier-wales-

[html#:~:text=Life%20expectancy%20at%20birth%20was,males%20in%202018%20to%202020](https://www.gov.wales/wellbeing-wales-2022-healthier-wales-)

- Future risks – Climate change and new technology may place more demand on resources.
- Prevention and protection – how will our engagement with the public and businesses be affected.
- Communication - Key to aid understanding of the challenges faced and impacts of any proposals.

During the pre-consultation phase, various equality interest groups were approached to participate in the consultation. Twenty-eight established groups can be broadly described as local equality charities, community groups, equality advisory groups, support groups and faith-based organisations from across North Wales.

As part of the pre-consultation, engagement methodology included focus groups which were conducted online and in person, while some groups wished to communicate initially via email and telephone. The range of communication methods used has widened access and feedback was captured. This feedback reinforced and informed the methodology the Service adopted to engage and communicate with different stakeholders during the full consultation. The feedback from the equality interest groups during the pre-consultation was extremely valuable, especially their views concerning fire prevention and protection activity which highlighted the need to include information that related to all three options.

In summary, pre-consultation feedback from equality interest groups themed mostly around prevention activity and the Service's capacity to attend community events, deliver Safe and Well Checks and provide fire safety advice in the future. Therefore, the three options have been developed to have some focus on prevention activity and the literature provided highlights the potential impact on presentation activity. Two options will add value in terms of capacity to deliver prevention work in the local community. This engagement enabled the Service to explain how most prevention activity is delivered by prevention staff, but operational teams do add value. No other concerns were raised during the pre-consultation phase.

The Service concluded its pre-consultation activities with the guidance and support from the Consultation Institute in June, to ensure consultation readiness in time for a full consultation process.

A pre-consultation summary report based on the Regional and EDI focus groups was produced and published as part of the 'How the options were developed' section of the consultation information found [here](#).

Engagement and Consultation with Specific Equality Groups

A series of Equality, Diversity and Inclusion focus groups were held as part of the consultation where members of the team attended sessions to present and discuss the consultation and to gather feedback; this helped to ensure that all members of the community had the opportunity to share their views based on the options presented within the ECR.

A total of 17 focus groups were organised in partnership with equality interest groups, charities, faith-based organisations, places of worship and educational institutions. The number of attendees is detailed in the table found within section 4.2 [here](#).

Those attending sessions represented a range of community members, with those who may otherwise find accessing the consultation difficult encouraged to take part without support. Consultation questionnaires were completed during sessions, with other attendees choosing to take the questionnaire / information away to complete following the session. Focus groups at local universities, colleges and at local youth groups helped to capture the views of young people and those from a variety of ethnic backgrounds.

A specific question was developed within the consultation questionnaire to support the understanding of the impact of the ECR in relation to its equality impact.

Namely: Are there any other equality issues that we could be thinking about?

The Equality Impacts collated as part of the consultation can be found in section 3.2.3 of the consultation report, which can be found [here](#).

Midway through the consultation, it was identified that not many people aged 25 and under were engaging in the consultation sessions or completing the online questionnaire. As a result, focus groups were arranged at various youth groups and colleges in Wrexham and Flintshire, although it can be acknowledged that some students live in Denbighshire. University freshers' fairs were also used to engage with youths and young adults.

The Service received feedback from a group of older people that were unable to attend the public engagement event in Conwy and unable to access the online questionnaire. To widen access, the Service organised a specific focus group in partnership with the 'Brew and Biscuit' Group in Llandudno Junction.

During the Emergency Cover Review consultation, focus groups were organised with operational staff at various locations based on request. The feedback provided has been included in the Equality Impact Assessment which identifies and assesses the potential risk of discrimination and disadvantage to firefighters because of the proposed changes. Although over 50 staff attended the internal focus groups, only 37 wholetime firefighters provided feedback.

The Equality Diversity and Inclusion (EDI) Officer attended four focus group sessions organised by firefighters at Deeside, Rhyl (x 2) and Wrexham. Notes were taken by a Women in the Fire Service representative at one of the Rhyl sessions, but staff were asked to email their individual concerns at the other focus groups. This approach helped ensure the EDI Officer could focus on what was being said and feedback provided by firefighters was not misunderstood.

This staff engagement is summarised below:

Fire Station Location	Female	Male	Total
Deeside	2	8	10
Holyhead	0	1	1
Llandudno	0	1	1
Rhyl	7	9	16
Undisclosed	1	2	3
Wrexham	1	5	6
Total	11	26	37

As a public body, North Wales Fire and Rescue Authority has a duty to pay due regard to the Public Sector Equality Duty to consider the impact of its decisions on people with protected characteristics under the Equality Act 2010, as well as the Human Rights Act 1998 and Welsh Language Standards 2011. Optional questions were therefore included in the consultation questionnaire. Approximately one in five (20%) respondents chose not to provide equality monitoring information.

The full equality monitoring information collated during the consultation can be found in section 3.1.4 of the Consultation Report which can be found [here](#).

Summary of Engagement and Consultation

As part of the ECR, NWFRA administered a public consultation to gather feedback about the future of how they provide emergency cover services in North Wales.

The consultation mandate invited those who live, work and travel in the region to share their views on what risks concern them most, what decision-making criteria are important to them, and how they felt the options presented meet the needs of their communities.

The formal consultation ran from 21 July to 30 September 2023. The original closing date of the consultation was extended from 22 September to 30 September following feedback and requests from stakeholders and the public.

The consultation survey was available online (via the [Your Voice consultation hub](#)) and in paper copies as required with a Freepost address for replies along with easy-read and bilingual versions. The full consultation documents can be found [here](#).

A series of 17 in-person and on-line community engagement events were held across the area between 15 August 2023 and 14 September 2023 giving the public the opportunity to learn more about the Emergency Cover Review and to ask questions that informed their ability to respond and provide feedback in via the consultation questionnaire.

Representatives from NWFRS also attended several community events and summer shows during the consultation period to raise awareness of the consultation.

A series of focus groups with people across different equality interest groups were delivered. An Equality Impact Assessment was completed as part of an initial stakeholder mapping exercise during pre-consultation phase, it can be found [here](#) attached as Appendix 2.

Workforce Equality Analysis

Consultation with members of staff was carried out through a programme of visits by senior managers and principal officers to fire stations, at seminars held for middle managers and supervisory managers, and via fire station watch briefings by station support officers and middle managers. Internal communication channels were also used to help raise regular awareness of the consultation amongst staff, including the Chief Fire Officer's Update in the Weekly Brief and a dedicated section on the Service's intranet.

Engagement with staff representative bodies was carried out via the Joint Consultative Forum, while Frequently Asked Questions were collated from

station visits; these were developed and updated throughout the consultation period and made available via the Service's intranet.

Stakeholder mapping analysis was undertaken to ensure that all those with an interest or who might be affected were engaged in the consultation.

A database of stakeholders and contacts was established, and a bilingual e-mail sent from the North Wales Fire and Rescue Authority Chair to all contacts on the day of the consultation launch. This database included members of the Senedd, members of Parliament, member liaison officers for local authorities, town council clerks, members of the Local Resilience Forum, senior officers from partner organisations, contacts from the three partnership managers and contacts from the Equality, Diversity and Inclusion Officer. Members of the public who had requested to join the database to be kept informed about any consultations were also included. A further e-mail was forwarded to contacts to inform them that the consultation deadline had been extended.

Printed copies of the ECR consultation leaflets, booklets and questionnaires were distributed by the local partnership managers at various community venues and locations. Flyers were also left at every house that had a Safe and Well Check during the consultation period.

The full consultation ran from 21 July to 30 September 2023, and the consultation survey received a total of 1,726 responses (1,500 online and 226 paper-based).

191 responses were received from employees of North Wales Fire and Rescue Service.

More than 400 people attended community engagement events and more than 480 attended Equality, Diversity and Inclusion focus groups or engaged with the Equality, Diversity and Inclusion Officer as part of the consultation.

A total of 119 enquiries and / or objections to the ECR were received during the consultation period, with the majority of these in the form of e-mails. Smaller numbers were received as letters, telephone calls and face-to-face enquiries.

Enquiries / objections included responses from members of the Senedd, members of Parliament, party candidates, local authorities, town councils, councillors, government representatives and representative bodies. Five petitions were also received during the consultation period.

North Wales Fire and Rescue Service responded and reacted to feedback throughout the consultation period.

A final summary report was compiled by an independent research consultant. This report was presented to the Full Fire and Rescue Authority on the 16 October 2023, it can be found [here](#).

Summary of the Findings of the Equality Impact Analysis

Comprehensive feedback captured during the consultation period enabled the Service to identify and assess the potential impacts to external and internal stakeholders.

This section summarises the multiple equality themes that emerged and the various measures the Service will implement to mitigate the impact on people, but more importantly, to eliminate discrimination.

Sub sections have been used to provide some commentary of each protected characteristic and other equality related themes which link to the Welsh language, socio-economic status and geographical location.

Age

External Stakeholders

Population aging: With a significant portion of North Wales' population aged 65 and over, concerns were raised during the consultation about the potential impact of changes on older individuals, particularly in areas where slower emergency response times might affect their safety.

Disability and age: The report highlighted an increasing prevalence of disability in different age groups, which could affect emergency response needs and the ability of certain individuals to escape during emergencies, such as fires.

Engagement challenges: There were difficulties engaging younger demographics (25 and under) in the consultation process. Efforts were made to increase participation among youth and young adults, including organising focus groups at various youth groups and colleges.

Language and cultural barriers: Concerns were raised about older members of the Muslim community facing risks due to limited mobility, language barriers, and cultural practices affecting fire safety measures. The proposal suggests providing fire safety interventions and support tailored to this community.

Infrastructure and access concerns: Issues were raised regarding access for emergency services in areas with older buildings, narrow access, and limited

parking. Additionally, concerns about speed restrictions impacting emergency response times were highlighted.

Mitigation Efforts for External Stakeholders

Engagement strategies: The Service made efforts to engage underrepresented groups, including older individuals and youths, through focus groups, public events, and collaborations with community organisations.

Tailored interventions: Specific actions were proposed to address identified risks, such as offering Safe and Well Checks, organising group visits, and promoting awareness campaigns regarding parking and access issues.

Residual Risks

Some concerns around slower emergency response times for certain demographics, despite attempts to address these through policy clarifications and engagement strategies, may persist.

Internal Stakeholders (Firefighters)

Travel and fatigue concerns: Firefighters expressed worries about increased travel times impacting fatigue, especially for older firefighters commuting longer distances, potentially affecting their wellbeing.

Intersectionality: There were concerns regarding the impact of longer travel distances on female firefighters experiencing extreme menopause symptoms.

Mitigation Efforts for Internal Stakeholders

Work location flexibility: Efforts will be made to accommodate firefighters' preferred work locations, although this cannot be guaranteed for everyone.

Support for specific needs: Policies and support mechanisms are in place, including disability coverage and the recent development of a new menopause policy, to address specific concerns and provide necessary support.

Residual Risks

Overall, the EqIA highlights various efforts made to address concerns and mitigate risks for both external stakeholders and internal firefighters. However, some residual risks, particularly related to slower emergency response times impacting specific demographics and individual concerns of firefighters, may persist.

Disability

External Stakeholders

Population with disabilities: A significant portion of the North Wales population has disabilities or long-term health conditions, as highlighted by the latest Census data.

Comprehensive feedback was gathered through public engagement events and equality focus groups organised with various partner organisations.

Concerns raised: During the consultation, concerns were expressed about the ageing population, vulnerability to falls, and difficulties in escaping fires, particularly for individuals with limited mobility or health conditions. Access issues and the impact of the new 20mph speed limit were also highlighted, especially in specific areas like Conwy, Deeside, Holywell, and Wrexham.

Engagement with specific groups: Representatives from Autistic UK sought clarification on how the Service interacts with autistic and disabled individuals, emphasising the need for better engagement and understanding.

Mitigation Efforts for External Stakeholders

Engagement and awareness: The Service made significant efforts to engage with and capture feedback from individuals with disabilities or long-term health conditions through various events and partnerships.

Training and support: Assurance was given that the Service's prevention team sought to connect with representative stakeholder groups within North Wales and plans were outlined to ensure staff receive Autism Awareness training to improve interactions and support for neurodiverse individuals.

Residual Risks

Challenges related to access issues, especially in specific areas with narrow streets, concerns regarding falls and the vulnerability of ageing populations, and potential difficulties in catering to specific needs during emergencies for individuals with disabilities or health conditions, may persist despite engagement efforts.

Internal Stakeholders (Firefighters)

Concerns raised: Firefighters expressed concerns about potential adverse impacts on their physical and mental health due to increased travel distances across North Wales. There were worries about boredom, poor posture, and fatigue resulting from longer shifts and distances.

Impact on female firefighters: There were concerns that longer travel distances would disproportionately affect female firefighters, especially those

experiencing extreme menopause symptoms, potentially impacting their performance, concentration, and overall wellbeing.

Specific circumstances and caring responsibilities: Some firefighters disclosed caring responsibilities for family members with chronic conditions or disabilities. Concerns were raised about potential relocation impacting their ability to provide care and support.

Mitigation Efforts for Internal Stakeholders

Health and wellbeing support: Efforts were made to provide advice on safe driving habits to mitigate physical health concerns related to longer travel distances. Additionally, plans for accommodating requests regarding work locations and providing reasonable adjustments were outlined.

Consideration for caring responsibilities: The Service aims to consider and accommodate the specific needs of firefighters with caring responsibilities during any relocation process, ensuring no discrimination or adverse impacts due to their circumstances.

Residual Risks

Despite efforts to accommodate preferences and provide support, challenges related to the impact of longer travel distances on firefighters' health and wellbeing, especially for female firefighters experiencing menopause symptoms, and potential difficulties in accommodating caring responsibilities, might persist.

The EqIA report emphasises the importance of addressing these concerns for both external stakeholders with disabilities or health conditions and internal stakeholders, particularly firefighters, by ensuring engagement, support, and accommodation wherever possible.

Mental Health and Wellbeing

External Stakeholders

Mental health and wellbeing: The report acknowledges that mental health and wellbeing concerns, encompassing low mood, stress, anxiety, and depression, were prevalent among the public. Comprehensive engagement efforts were made to capture these impacts on both the public and the Service's workforce.

Public feedback and priorities: The consultation revealed concerns about workforce wellbeing, emphasising the importance of an efficient and well-trained workforce, maintaining work-life balance, and addressing potential impacts on staff and their families. Option 1 was perceived as providing the best fire cover by 68% of respondents, with concerns raised about job insecurity and adverse impacts on mental health linked to other options.

Mitigation Efforts for External Stakeholders

Engagement and public views: Efforts were made to capture and address public concerns regarding workforce wellbeing, job security, and the impact of proposed options, especially regarding mental health. Option 1 was favoured for its perceived protection of firefighter jobs.

Understanding Public Perception: While the public perceived Option 1 as having minimal adverse impacts, it was noted that further consultation with staff indicated potentially greater impacts, especially on mental health.

Residual Risks for External Stakeholders

Despite public favour towards Option 1, there was a concern that while the public perceived minimal adverse effects, the actual impacts on Service staff could be more substantial.

Internal Stakeholders (Firefighters)

Mental and physical health concerns: Firefighters expressed anxiety over increased travel time impacting their physical and mental health. Adverse mental health effects resulting from uncertainty and potential changes in duty systems or workplace locations were prevalent.

Support and communication: The Service recognises and will address these mental health concerns by providing support mechanisms and communicating with affected firefighters.

Impact on social life and mental health: Firefighters voiced concerns about potential changes impacting their social lives, leading to compromised mental health. The importance of managing individual circumstances during the redeployment process was highlighted to minimise negative impacts.

Mitigation Efforts for Internal Stakeholders

Addressing concerns: Efforts will be made to mitigate risks by allowing firefighters to express their preferred work locations and individual situations during any relocation process. Support mechanisms and relevant advice will be provided to help manage stress, fatigue, and physical strain due to increased travel time.

Residual Risks for Internal Stakeholders

Despite efforts to address concerns and provide support, potential residual risks remain regarding the adverse impact of increased travel time on firefighters' physical health, mental health, and social lives due to changes in duty systems or workplace locations.

The EqIA report underlines the importance of understanding and addressing mental health concerns for both external stakeholders, such as the public,

and internal stakeholders, specifically firefighters, while implementing changes and conducting consultations.

Gender

External Stakeholders

Engagement and gender groups: The Service engaged various gender-based organisations to connect with specific gender groups and gathered feedback.

Concerns were raised regarding potential duty system changes affecting women, especially primary carers and parents. Gender imbalances in carer roles were noted, raising issues related to childcare responsibilities and socio-economic status.

Likelihood and impact: Concerns around the impact of duty system changes on women's participation and carer responsibilities were expressed. The likelihood of such impacts was rated moderately, with an overall impact score indicating significant concern.

Mitigation Efforts for External Stakeholders

Further research and surveys: This includes plans for public perception surveys across different age groups to explore concerns further and gather evidence and utilising recent staff surveys to inform decisions concerning women and parenting responsibilities.

Understanding Intersectionality: Acknowledgment of intersectional concerns such as the impact on individuals living alone, is covered in various sections of this report (I.e. Age).

Residual Risks for External Stakeholders

Gender impact concerns: Despite planned surveys and use of staff feedback, there is a risk of overlooking specific concerns, especially those affecting women as primary carers, during potential duty system changes.

Internal Stakeholders (Firefighters)

Parenting concerns: Feedback highlighted concerns among male and female firefighters regarding their roles as primary carer. The potential impact of duty system or location changes on parenting responsibilities, childcare costs, and family routines were emphasised.

Pregnancy and maternity: Firefighters expressed concerns that changes could hinder recruitment and retention of young parents, especially women, due to work-life balance issues, travel times, and childcare costs.

Mitigation Efforts for Internal Stakeholders

Accommodating individual needs: This includes plans to allow firefighters to express their preferences during any relocation, which will consider their individual circumstances, equality needs and preferences, especially for pregnant staff or those returning from maternity leave.

Addressing recruitment concerns: Efforts to mitigate concerns about potential female firefighters leaving by considering individual needs, preferences, and providing support for maternity-related issues.

Residual Risks for Internal Stakeholders

Recruitment and retention challenges: Despite efforts to accommodate preferences and support pregnant staff, there's a residual risk of hindering recruitment and retaining female firefighters due to potential work-life balance challenges and childcare issues.

The EqIA report identifies significant concerns regarding gender-specific impacts, especially related to caring responsibilities, parenting, and recruitment challenges. It emphasises the importance of considering individual needs and preferences while implementing any changes in duty systems or locations to mitigate adverse impacts on both internal and external stakeholders.

Pregnancy and Maternity

External Stakeholders

Engagement with pregnant individuals and those on maternity leave revealed no specific equality issues related to pregnancy or maternity. Collaborations with organisations like North Wales Women's Centre, North Wales Pride, and universities facilitated connections with the target audience. Some students expressed interest in the duty system of Options but raised concerns about flexibility, particularly for individuals with new babies.

Mitigation for External Stakeholders

Organic engagement: The Service's approach was aimed at comprehensive engagement without specifically targeting individuals based on pregnancy and maternity, ensuring diverse perspectives were captured.

Residual Risk for External Stakeholders

Potential unidentified concerns: While no explicit concerns arose, there remains a residual risk of unexplored issues related to marriage or civil partnerships that might not have been voiced during the consultation.

Internal Stakeholders (Firefighters)

Future impact: Firefighters without children but aspiring for families expressed concerns about potential relocation to new stations affecting recruitment and retention.

Recruitment challenges: Concerns arose concerning the impact of all three options on recruiting young parents, particularly women, due to work-life balance, increased travel, and childcare costs.

Mitigation for internal stakeholders

Individual consideration: Measures proposed include allowing input in workplace preferences during any relocation and considering individual needs during the process, especially for pregnant individuals and those returning from maternity leave

Residual Risks for Internal Stakeholders:

Despite mitigation measures, potential challenges remain in retaining and recruiting young parents, particularly women, due to perceived work-life balance issues, travel constraints, and childcare costs. Balancing the Service's needs with individual needs could pose an ongoing challenge.

Gender Reassignment / Identity

External Stakeholders (Transgender and/or Non-Binary Individuals)

Engagement and themes: Engagement with transgender and non-binary communities provided comprehensive feedback, highlighting concerns about potential barriers. Unique Transgender Network expressed interest in prevention work and engagement with the fire service. Concerns were raised about potential station closures, duty system changes, and impact on the Service's involvement in community events like Pride.

Mitigation Efforts for External Stakeholders

Clarification on Service activities: The Service clarified its non-operational departments' roles in community engagement, emphasising that proposed changes could enhance community outreach in key locations.

Residual Risks for External Stakeholders

Perception concerns: Despite explanations, there is a residual risk that perceptions of reduced staff or station closures might impact the Service's ability to engage with the transgender and wider community.

Internal Stakeholders (Firefighters)

Engagement with internal groups: The Equality, Diversity, and Inclusion Officer consulted with the FirePride LGBTQ+ Staff Network during the pre-consultation, and no concerns specifically relating to transgender and/or non-binary individuals were raised during internal focus groups.

Since no direct concerns emerged in internal focus groups, the risk related to transgender and/or non-binary individuals is deemed low internally.

Overall, the report suggests that concerns from external transgender and non-binary stakeholders primarily revolve around potential impacts of station closures and changes in service provision. The Service aims to mitigate these concerns by emphasising the broader outreach capability in strategic locations. Internally, the lack of specific concerns from staff groups indicates a lower risk concerning transgender and/or non-binary issues within the Service. However, there might still be residual risks in managing external stakeholders' perceptions regarding the Service's community engagement capabilities.

Sexual Orientation

External Stakeholders (LGB+ Community)

Engagement and profile: Engagement with the LGB+ community involved partnerships with LGBTQ+ charities, support groups, and pride events, aiming to capture comprehensive feedback. A considerable percentage (10%) of respondents identified as LGB+. The consultation feedback suggested Option 1 was preferred, with opposition toward Options 2 and 3.

Overall perception: The wider LGBTQ+ community did not express concerns regarding direct or indirect impacts from proposed changes. The views of the LGB+ community regarding the options were aligned with those identifying as heterosexual or straight.

Mitigation for External Stakeholders

Comprehensive representation: The feedback gathered from the LGB+ community during the consultation was deemed comprehensive and representative.

Residual Risks for External Stakeholders

Potential disparities in impact perception: While no direct concerns were raised, there might be residual risks in misalignment between perceived impacts of the options within the LGB+ community.

Internal Stakeholders (Firefighters)

ED&I engagement: The EDI Officer collaborated with the FirePride LGBTQ+ Staff Network before the consultation without identifying any specific concerns. However, during the main consultation, internal focus groups revealed certain concerns related to parenting, childcare, and caring responsibilities within same-sex relationships.

Challenges highlighted: Discussions in internal focus groups unveiled potential challenges faced by individuals in same-sex relationships concerning parenting processes like IVF and adoption. Firefighters emphasised the additional hurdles LGB+ individuals might face during adoption or IVF processes, highlighting concerns about potential relocation's impact on their support networks and access to childcare provision.

Mitigation for Internal Stakeholders

Individual consideration: The Service aims to consider individual needs during any potential workplace relocations to alleviate risks and minimise impacts, acknowledging the importance of accommodating diverse family structures and support needs.

Residual Risks for Internal Stakeholders

The report underscores the need for personalised consideration in potential workplace relocations, especially for individuals in same-sex relationships, to address their unique challenges and support networks. Residual risks persist in ensuring stress reduction and accommodating diverse support needs amidst any potential change.

Marriage or Civil Partnership

Although marriage and civil partnership is not covered within the Public Sector Equality Duty, the Service still wanted to show due regard for this protected characteristic based on fact that people that are in a relationship or 'single' may be placed at a disadvantage as a result of the proposed changes.

External Stakeholders

Engagement and identified risks: Around 48.1% of individuals aged 16 and over are married or in civil partnerships⁵⁰. The Service anticipated organic engagement during the pre-consultation and felt confident in capturing comprehensive feedback. During the consultation, no specific concerns

⁵⁰ Welsh Government (2022) Statistics Wales Demography newsletter: December 2022, Found at: www.gov.wales/statistics-wales-demography-newsletter-december-2022-#:~:text=In%20Wales%2C%2043.8%25%20of%20all,or%20in%20a%20civil%20partnership

emerged in public sessions or equality focus groups regarding a person's relationship status, indicating a low risk.

Mitigation for External Stakeholders

Organic engagement: The Service's approach was aimed at comprehensive engagement without specifically targeting individuals based on relationship status, ensuring diverse perspectives were captured.

Residual Risks for External Stakeholders

Potential unidentified concerns: While no explicit concerns arose, there remains a residual risk of unexplored issues related to marriage or civil partnerships that might not have been voiced during the consultation.

Internal Stakeholders (Firefighters)

Intersectionality of concerns: Internal focus groups revealed concerns among firefighters that directly or indirectly impacted their partners or ex-partners regarding childcare and relationship status. This section of the report explores how the proposed changes might affect individuals' relationship statuses, intersecting with other protected characteristics.

Gender and parenting impact: Female firefighters, often primary carer, might face a greater impact from proposed changes, especially if they are single parents, aligning with national statistics indicating a higher percentage of single-parent households among females.

Intersection with sexual orientation: Data suggests a higher likelihood of being single among individuals identifying as Lesbian, Gay, or Bisexual. Such insights enable a deeper understanding of how relationship statuses vary among different groups, potentially affecting financial situations.

Mitigation for Internal Stakeholders

Individual consideration: Acknowledging the intersectionality of relationship status with other protected characteristics, the Service aims to consider individual needs during any relocation process, encouraging transparency about relationship status to inform decision-making and mitigate potential impacts.

Residual Risks for Internal Stakeholders

Incomplete understanding: Despite insights into relationship statuses, there's a residual risk of overlooking specific challenges or impacts related to marriage or singlehood, especially regarding financial considerations, which will be explored in more detail in the socio-economic status section. The Service must remain open to ongoing dialogue to capture any unaddressed concerns.

Religion and/or Belief

External Stakeholders

Religious diversity: North Wales exhibits diverse religious affiliations, with Christianity being the largest (46.3%), followed by smaller groups like Muslim, Hindu, Buddhist, Sikh, Jewish, Pagan, Spiritualist, and others. Nearly half the population (46.5%) report no religious affiliation, making places of worship ideal for engagement.

Engagement strategies: The Service extensively promoted the consultation within religious groups, faith-based organisations, and places of worship, connecting with various communities. The engagement aimed to gather feedback and promote fire safety messages.

Identified Risks and Mitigation

Reduced fire cover concerns: Some feedback expressed worries about reduced fire cover, especially in areas with higher concentrations of religious communities. Engagement efforts aimed to address these concerns by explaining dedicated fire safety teams and arranging visits to promote services.

Wrexham Islamic Centre concerns: Specific concerns from this group highlighted the potential impact of relocating Wrexham's third fire appliance on non-emergency work, emphasising the importance of prevention activity and community engagement. The Service intends to connect with such organisations to ensure continued support.

Residual Risks for External Stakeholders

Addressing engagement concerns: Despite efforts, there may still be unaddressed worries or feedback regarding the Service's engagement with religious communities and its impact on fire safety messages and services.

Internal Stakeholders (Firefighters)

Pre-Consultation and main consultation findings: The Equality, Diversity, and Inclusion Officer collaborated with the Religion, Ethnicity, and Cultural Heritage (REACH) Staff Network in the pre-consultation phase. During the main consultation, no direct concerns relating to religion emerged among internal stakeholders, indicating a low risk.

Residual Risks for Internal Stakeholders

Potential unvoiced concerns: Despite no reported concerns, there might be undisclosed issues or worries among internal stakeholders regarding religious aspects that have not been vocalised during the consultation.

Race

External Stakeholders (Ethnic Diversity, Language, and Culture)

Ethnic diversity: North Wales has witnessed an increase in ethnic minority groups, rising from 4.4% in 2011 to 6.2% in 2021. The largest group was "Other White," with varying ethnicities across local authorities. Additionally, households with multiple ethnicities increased to 5.3% from 4.2% in 2011.

Language and culture: Language and cultural barriers were identified as potential challenges. Efforts were made to engage diverse communities, arranging translations, and providing information in various formats and languages, ensuring accessibility.

Risks Identified and Mitigation

Language barriers: Concerns about language barriers and communication gaps were raised, especially in non-English-speaking communities. Mitigation included translation services, creating materials in various languages, in easy read formats and arranging focus groups for feedback.

Community engagement: Feedback highlighted worries about reduced firefighter presence impacting community work, particularly in conducting Safe and Well Checks. The Service clarified its non-operational task teams' roles and commitment to community engagement regardless of the number of fire appliances.

Elderly community risks: Concerns about elder members of the Muslim community, particularly those without English or Welsh as their first language, were raised. The Service aims to recruit staff from diverse backgrounds that represent the communities they serve. Communications from the Service will be provided multilingually, with co-ordination between prevention and corporate communications teams to ensure messaging reaches the heart of our diverse communities.

Internal Stakeholders (Firefighters)

Consultation findings: No direct concerns about race, ethnicity, or nationality were reported during the main consultation. While the current risk is considered low, ongoing consideration of cultural practices is essential, particularly regarding caring responsibilities for elders among certain ethnic groups.

Residual Risks for Internal Stakeholders

Policy and cultural considerations: Existing policies handle considerations related to duty systems and workplace location for firefighters, yet ongoing attention to cultural practices remains crucial. Some cultural nuances in

caring responsibilities may need further attention and consideration within the organisation.

Socio Economic Duty

This duty, effective from 31 March 2021 requires public bodies in Wales to consider reducing inequalities linked to socio-economic disadvantage. The Service has used a comprehensive approach to analyse socio-economic aspects like education, employment, health, living standards, justice, and participation within North Wales.

External Stakeholders

Regional profile: The diverse landscape and population of 687,000 in North Wales covers six counties. Deprivation in areas like Rhyl, Kinmel Bay, and others was highlighted, prompting extensive engagement in these deprived localities.

Barriers to engagement: Efforts were made to engage those facing barriers to participation, considering internet access, transport, and financial constraints. Multiple methods like public events, online sessions, and printed questionnaires were used to widen accessibility. The Equality, Diversity and Inclusion Officer attended various equality groups as a way of ensuring people that wouldn't usually access the public engagement events could have a voice and provide feedback.

Education and employment: Feedback did not surface specific equality themes but revealed disparities in Not in Employment, Education or Training (NEET) rates, employment, and in-work poverty across different demographics. Option 1 received considerable support from respondents.

Health and living standards: While generic feedback emerged, specific equality issues were limited. Concerns over the cost-of-living crisis impacting health were noted and older people, especially those with a disability being less able to escape an emergency situation.

Internal Stakeholders

Socio-Economic Disadvantage: Internal focus groups highlighted potential increased costs affecting firefighters, including travel, childcare, caring responsibilities, and pet welfare. Proposed mitigation strategies include absorbing any relocation-related expenses and considering individual circumstances during potential relocation.

Mitigation and Remaining Risks

Individual Consideration: Strategies include absorbing additional costs for any potential relocated employees, considering childcare and caring

responsibilities, and enabling employees to explain individual needs during relocations.

Residual risks: Despite proposed mitigation efforts, potential financial disadvantages to firefighters due to increased costs post-relocation remain, necessitating ongoing consideration and individualised assessments.

Overall, the Service has employed a multifaceted approach to engage external stakeholders, identify inequalities, and mitigate risks. However, residual risks related to potential financial disadvantages for firefighters' post-relocation persist, requiring continued attention and individualised support.

Welsh Language

External Stakeholders

Language consideration: The Emergency Cover Review has been communicated in Welsh and English, ensuring information accessibility. The Welsh language's growing popularity is noted, especially in areas like Gwynedd and Anglesey.

Impact on Welsh speakers: Option 3, involving closure of on-call or RDS fire stations, could affect areas with high Welsh-speaking populations like Cerrigydrudion, Llanberis, Abersoch, and Beaumaris. This may hinder public interactions in Welsh and impact employment opportunities for Welsh speakers in rural areas.

Welsh 'Heartlands': Fire stations like Conwy, despite not being immediate Welsh 'Heartlands', serve as bilingual employment hubs and are significant in areas sensitive to language decline.

Mitigation and Positive Impact

Relocation of staff: Creating day staffed stations in Welsh 'Heartlands' could positively influence Welsh language engagement and perception of the Service as bilingual.

Public perception: Retaining existing Welsh-speaking firefighters under Option 1 is viewed positively by 68% of respondents and supports the Welsh language within the Service.

Internal Stakeholders

Staff responses: Internal comments revolve around employment diversity and the Welsh language. There is a spectrum of opinions regarding the necessity of Welsh proficiency, with some seeing it as vital for recruitment and others viewing it as limiting.

Service commitment: While balancing skills and language requirements for roles, the Service is committed to meeting Welsh Language Standards to ensure equitable access to services in Welsh and English.

Mitigation and Residual Risk

Mitigation efforts: During potential relocation of staff, retaining Welsh-speaking firefighters under Option 1 would aim to support the Welsh language within the Service.

Residual risks: The varying opinions among staff regarding Welsh language requirements may pose ongoing challenges in recruitment and diversity, potentially impacting the Service's linguistic capabilities. The closure of stations in Welsh-speaking areas under Option 3 might negatively affect both public interaction and Welsh-speaking employment opportunities.

Mitigating Potential Adverse Impacts on Equality

Various potential risks have been highlighted within the EIA and how the Service will mitigate this risk has been explained in most parts. However, at an individual level, some risks associated with firefighters that could potentially work a different duty system or be relocated to another place of work are still unknown.

The Equality, Diversity and Inclusion Officer organised internal focus groups which saw various potential risks emerge and the Service has explained how they mitigate these potential risks. The preferencing exercise which will be conducted as part of the potential relocation of firefighters will help identify further risks where mitigation can be considered and implemented where possible.

Creating an implementation team to comprehensively address potential equality impacts is crucial for the success of the ECR. This team will comprise diverse expertise from within NWFRS. Its primary objective will be to rigorously evaluate and strategise ways to mitigate any adverse impacts on firefighters and their families because of any proposed changes.

The team's composition will include representatives from various departments and roles within the Service, ensuring a holistic and multidisciplinary approach. It will involve individuals with expertise in equality and diversity, operational management, community engagement, human resources, and any other relevant stakeholders.

This team will ensure that the ECR not only adheres to legal and ethical equality standards but also embodies a commitment to creating a fair and inclusive operational framework.

It should be noted that it is not expected that any other organisations will be involved in addressing potential equality impacts but NWFRS will aim to continue to work collaboratively with other agencies and partners as it already does.

Equality Impact Assessment Summary by Options

As described earlier in this report, (attached as Appendix 3) a full EqIA was completed based on the engagement and consultation with specific equality groups and staff (page 25). As described above, these engagement sessions involved the presentation of all options within the ECR. However, feedback was not received to align to each individual option but was given against the ECR and all options as a whole. There were some observations during these sessions that can be attributed to specific options and these are reflected in the following tables. The risk rating within the following tables supports decision modelling where the intended course of action (Options 1-3) is considered in the context of equality risk, i.e. how likely is the assumed impact upon any protected groups to occur.

Risk Rating	Description
Manageable	The risk may be so low that the Service chooses to accept it and instead simply records that the risk has been identified and that, due to its low likelihood or impact, no further action will be required. Alternatively, minor considerations may be needed upon implementation.
Medium	The EqIA owner will mitigate identified risks through slight amendments or implement further controls that reduce or eliminate the risk. Alternatively, the owner could confirm that all reasonable steps have been taken to mitigate the risk and no further reasonable action is possible.
High	This policy, project or service cannot be rolled out until detailed external and / or internal consultation has taken place with those that this area of work affects.
Very High	High risks have been identified, so take immediate action. If legal action is likely, then the Service cannot go ahead with the policy without fundamentally changing it. If the impact remains severe even with this mitigation, then consultation with internal and / or external groups will have to take place.

Protected Characteristic or Equality Theme	Option1	Option 2	Option 3
Age - External Stakeholders	Some concerns raised that older people being less mobile may be less likely to escape in a developing fire, this emphasised concerns around response times due to shift changes.	Young people at the Wrexham Islamic group were concerned about the impact upon community work and safe and well visits if staff numbers were reduced.	Young people at the Wrexham Islamic group were concerned about the impact upon community work and safe and well visits if staff numbers were reduced.
		Some concerns raised that older people being less mobile may be less likely to escape in a developing fire, this emphasised concerns around response times due to shift changes.	Objections raised to closures of stations due to vulnerable residents living in the areas directly affected.
			Some concerns raised that older people being less mobile may be less likely to escape in a developing fire, this emphasised concerns around response times due to shift changes.
Age - Internal Stakeholders	Some concerns from staff who advise that they have caring responsibility for either a child or an older relative.	Some concerns from staff who advise that they have caring responsibility for either a child or an older relative.	Some concerns from staff who advise that they have caring responsibility for either a child or an older relative.
Disability - External Stakeholders	No equality impacts identified.	No equality impacts identified.	Objections raised to closures of stations due to vulnerable residents living in the areas directly affected.
Disability - Internal Stakeholders	Concerns raised by a small number of staff that have caring responsibilities for a child with a disability or suspected disability	Concerns raised by a small number of staff that have caring responsibilities for a child with a disability or suspected disability.	Concerns raised by a small number of staff that have caring responsibilities for a child with a disability or suspected disability.

Protected Characteristic or Equality Theme	Option1	Option 2	Option 3
Mental Health and Wellbeing - External Stakeholders	No equality impacts identified	Concerns raised that a reduction in firefighters would impact mental health of staff through 'job insecurity'.	Objections raised to closures of stations due to vulnerable residents living in the areas affected.
			Concerns raised that a reduction in firefighters would impact mental health of staff through 'job insecurity'
Mental Health and Wellbeing - Internal Stakeholders	Concerns raised that changes of shift patterns would impact staff wellbeing.	Concerns raised that changes of shift patterns would impact staff wellbeing.	Concerns raised that changes of shift patterns would impact staff wellbeing.
Gender - External Stakeholders	No equality impacts identified	No equality impacts identified	No equality impacts identified
Gender - Internal Stakeholders	Concerns were raised that longer travelling distances to work may have a detrimental impact on those experiencing menopause symptoms.	Concerns were raised that longer travelling distances to work may have a detrimental impact on those experiencing menopause symptoms.	Concerns were raised that longer travelling distances to work may have a detrimental impact on those experiencing menopause symptoms.
	Concerns raised about changes to duty systems that would have a greater impact on women (as primary carers/parents)	Concerns raised about changes to duty systems that would have a greater impact on women (as primary carers/parents)	Concerns raised about changes to duty systems that would have a greater impact on women (as primary carers/parents)
	Concerns were raised that all options could impact recruitment of young parents, especially women.	Concerns were raised that all options could impact recruitment of young parents, especially women.	Concerns were raised that all options could impact recruitment of young parents, especially women.
Pregnancy and Maternity - External Stakeholders	Concerns raised about changes to duty systems that would have a greater impact on women (as primary carers/parents)	Concerns raised about changes to duty systems that would have a greater impact on women (as primary carers/parents)	Concerns raised about changes to duty systems that would have a greater impact on women (as primary carers/parents)

Protected Characteristic or Equality Theme	Option1	Option 2	Option 3
Pregnancy and Maternity - Internal Stakeholders	Concerns raised that changes to shift patterns are not family friendly and will impact those who are pregnant or have young families.	Concerns raised that changes to shift patterns are not family friendly and will impact those who are pregnant or have young families.	Concerns raised that changes to shift patterns are not family friendly and will impact those who are pregnant or have young families.
Gender Re-assignment/identity - External Stakeholders	No equality impacts identified	No equality impacts identified.	No equality impacts identified.
Gender Re-assignment/identity - Internal Stakeholders	No equality impacts identified	No equality impacts identified.	No equality impacts identified.
Sexual Orientation - External Stakeholders	No equality impacts identified	Concerns that reductions in staff numbers could negatively impact the services ability to conduct important prevention work.i.e. attendance at Pride events.	Concerns that reductions in staff numbers could negatively impact the services ability to conduct important prevention work.i.e. attendance at Pride events.
Sexual Orientation - Internal Stakeholders	Concerns raised that any changes to shift systems could make attendance at adoption/IVF appointments challenging.	Concerns raised that any changes to shift systems could make attendance at adoption/IVF appointments challenging.	Concerns raised that any changes to shift systems could make attendance at adoption/IVF appointments challenging.
	Data indicates LGB+ are more likely to be single, or live alone with a potential single income household this may be more impactful in a relocation process.	Data indicates LGB+ are more likely to be single, or live alone with a potential single income household this may be more impactful in a relocation process.	Data indicates LGB+ are more likely to be single, or live alone with a potential single income household this may be more impactful in a relocation process.
Marriage or Civil Partnership - External Stakeholders	No equality impacts identified	No equality impacts identified	No equality impacts identified

Protected Characteristic or Equality Theme	Option1	Option 2	Option 3
Marriage and Civil Partnership - Internal Stakeholders	No equality impacts identified	No equality impacts identified	No equality impacts identified
Religion and/or Belief - External Stakeholders		Some concerns that reduction in fire cover would come from areas that have higher concentrations of religious people, especially those from ethnic minority backgrounds.	Some concerns that reduction in fire cover would come from areas that have higher concentrations of religious people, especially those from ethnic minority backgrounds.
		Concerns that reduction in fire cover would reduce the services capacity to engage in non-emergency work, such as attending community events.	Concerns that reduction in fire cover would reduce the services capacity to engage in non-emergency work, such as attending community events.
Religion and/or Belief - Internal Stakeholders	No equality impacts identified	No equality impacts identified	No equality impacts identified
Race - External Stakeholders	No equality impacts identified	No equality impacts identified	No equality impacts identified
Race - Internal Stakeholders	No equality impacts identified	No equality impacts identified	No equality impacts identified
Socio Economic Duty - External Stakeholders	No equality impacts identified	No equality impacts identified	Objections raised to closures of stations due to vulnerable residents living in the areas affected.
Socio Economic Duty - Internal Stakeholders	Concerns raised that changes to shift systems could see increased costs for staff e.g. travel and childcare.	Concerns raised that changes to shift systems could see increased costs for staff e.g. travel and childcare.	Concerns raised that changes to shift systems could see increased costs for staff e.g. travel and childcare.

Protected Characteristic or Equality Theme	Option1	Option 2	Option 3
Welsh Language - External Stakeholders			Closure of Stations in traditional Welsh speaking areas would be linguistically sensitive, reducing the opportunity to communicate with the Service in Welsh and employment opportunities for Welsh speakers.
Welsh Language - Internal Stakeholders	No equality impacts identified	No equality impacts identified	No equality impacts identified

Conclusion

From an external perspective, the North Wales population continues to grow, people are living longer, more people are living in poverty, hate crime and domestic abuse remains high and there are increasing concerns surrounding mental and physical health. Other considerations, such as people with disabilities, health conditions and living alone, are just some of the factors that impact on people in society and their risks to fire and other emergencies.

The ECR presented three options for enhancing emergency cover across North Wales to enable the Service to be better placed to keep people safe through prevention work and responding effectively to emergency incidents when they occur. The consultation demonstrated overwhelming support for Option 1 (or an adapted version of this) - that will enable the Service to achieve this (see [ECR consultation outcomes report](#)). Emergency response aside, all three options presented benefits in social value and increase the Service's capacity to conduct important prevention activity and engage with the communities it serves.

Across different age groups, concerns were voiced regarding response times and mobility during fire emergencies. Older individuals, seen as potentially less mobile, were particularly highlighted in concerns regarding shift changes impacting their ability to escape developing fires. Similarly, internal stakeholders, particularly staff with caring responsibilities for children or older relatives, expressed worries across all options.

In terms of disability, external stakeholders mostly flagged concerns in Option 3 due to objections against station closures, which could affect vulnerable residents. Internally, a small group of staff with caring responsibilities for children with disabilities expressed concerns across all three options.

Mental health and well-being emerged as a significant theme, especially in Options 2 and 3. External stakeholders voiced worries about reduced firefighter numbers potentially causing job insecurity and impacting staff mental health. Internally, all options raised concerns about changes in shift patterns affecting staff well-being.

Gender-related considerations were noted internally, especially regarding the impact of longer commutes on menopausal symptoms. Recruitment concerns for young parents, particularly women, surfaced across all options among internal stakeholders.

For pregnancy and maternity, external stakeholders expressed concerns across all options about changes impacting pregnant individuals or those with young families. Similarly, internal stakeholders highlighted worries about shift patterns not being family-friendly across the board.

Concerns regarding gender reassignment or identity were not specifically highlighted for either external or internal stakeholders across the options.

In terms of sexual orientation, external stakeholders raised concerns in Options 2 and 3 about reduced staff impacting the service's participation in events like Pride. Internally, challenges were noted in attending adoption/IVF appointments due to changes in shift systems across all options.

Marriage or civil partnership considerations did not emerge as significant concerns for either external or internal stakeholders across the three options.

Religious implications were highlighted by external stakeholders, expressing concerns about reduced fire cover in areas with higher religious concentrations. Internally, no specific impacts were identified across all options.

Race-related considerations were not explicitly raised by either external or internal stakeholders across the options.

For socio-economic duty, both external and internal stakeholders expressed concerns about increased costs for staff (e.g., travel, childcare) across all three options.

Regarding the Welsh language, external stakeholders were concerned about station closures impacting Welsh-speaking areas, reducing opportunities for Welsh communication and employment.

The Service sees its people as its biggest asset and any potential impacts will be mitigated wherever possible. Various potential impacts have emerged which focus on increased costs that are associated with the proposed changes to duty systems and/or change of workplace location. These costs relate to fuel, wear and tear on firefighter's personal vehicle and childcare. Other issues relate to work/life balance, potential restricted ability to manage childcare arrangement with partners and family members and welfare of family pets. The Service will show due regard to all risks that have been identified during the consultation and any additional risks that may emerge during preferencing exercise and individual meetings that occur as part of the relocation of firefighters.

Specific detail regarding identified risks and mitigation can be found in the Equality Impact Assessment (Consultation and Decision-making Phase), Appendix 3.

Appendix 1

North Wales Fire and Rescue Authority Emergency Cover Review (ECR) Consultation and Engagement Communications Strategy

A comprehensive communications strategy was produced to support the North Wales Fire and Rescue Authority's public consultation as part of the Emergency Cover Review.

North Wales Fire and Rescue Service worked with the Consultation Institute, an independent, not-for-profit, best practice advisory body throughout to ensure that the public consultation was delivered to the required standards.

Best practice included conducting a detailed stakeholder mapping exercise and risk profiling workshop prior to beginning any consultation.

Constructive engagement was fostered with communities and key stakeholders across North Wales, including staff and their representative bodies, local politicians and council leaders, community groups, local authorities and other emergency services.

The consultation mandate invited those who live, work and travel in North Wales to share their views on what risks concern them most, what decision-

making criteria are important to them, and how they felt the options presented meet the needs of their communities.

To help develop future options, as a pre-consultation exercise, Staff from NWFRS worked with staff and representative bodies, members of the public, council representatives, local vulnerable groups and members of their Fire and Rescue Authority to understand what really matters should they, or someone they care for or represent, require their services in an emergency.

The feedback from pre-consultation engagement, along with professional opinion, modelling, and risk profiling, was used in the options appraisal phase to develop viable options for the future of emergency cover services across North Wales. The formal consultation ran from 21 July to 30 September 2023. The original closing date of the consultation was extended from 22 September to 30 September following feedback/requests from stakeholders and the public.

A variety of communication channels, messages, and target audiences were adopted to ensure effective delivery of the consultation and engagement process.

Clear and concise communications materials were developed to engage with stakeholders, including bilingual printed, easy read and digital content, to provide accessible information about the emergency cover arrangements and the consultation and engagement process, to ensure diverse perspectives could be incorporated into the review process.

Multiple communication channels included printed materials, social media, website, face to face meetings, and traditional media, to reach diverse audiences and maximise engagement.

Both online and face to face briefings and workshops provided opportunities for direct engagement, information sharing, and gathering input.

An online consultation and engagement platform was established, signposted via the Service website and social media, hosted on a consultation hub to enable access to information and the ability to submit feedback related to the emergency cover arrangements review. Printed questionnaires were also available to return via Freepost.

More information on the communications approach adopted is contained in the report on the response to the consultation presented to Fire and Rescue Authority members on 16 October which can be found [here](#). An update following consideration of this report by Fire and Rescue Authority Members can be found [here](#).

Appendix 2: Equality Impact Assessment (Pre-consultation Phase)

Appendix 3: Equality Impact Assessment (Consultation and Decision-Making Phase)