

Local Pay Policy

Report to:

Service Delivery Board
Commissioner's Board
London Fire Commissioner

Date:

29 July 2026
14 September 2026

Report by:

Andrew Cross – Head of HR Operations and Systems

Authorising Head of Service:

Sally Hopper – Director for People

Report classification:

For decision

For publication

Values

Service
Integrity
Equity

I agree the recommended decision below.



Jonathan Smith
London Fire Commissioner

This decision was remotely
Date **signed on 24 September 2026**

PART ONE

Non-confidential facts and advice to the decision-maker

Executive Summary

This report sets out the formal pay policy for 2026/27 to be adopted by the London Fire Commissioner (LFC) in accordance with the requirements of the Localism Act 2011, section 38.

Recommended decisions

For the London Fire Commissioner

The LFC approve the pay policy statement (Local Pay Policy) set out in Appendix 1 to the report prior to its publication.

1 Introduction and background

- 1.1** The Localism Act 2011 (the Act) sets out an obligation on all Local Authorities and all Fire and Rescue Authorities, including the LFC, to publish a formal pay policy statement. This statement must set out the LFC's policies and approach to the remuneration of chief officers and its lowest paid staff and must be reviewed and approved annually, and applied in practice. The first pay policy statement was set out in FEP 1906 and approved by LFEPA in March 2012; most recently, the LFC approved the 2025/26 pay policy statement (LFC-25-060) in July 2025.
- 1.2** The LFC was added to the list of relevant authorities within the Localism Act 2011 required to prepare an annual pay policy via paragraph 120 of Schedule 2 of the Policing and Crime Act 2017. This paragraph however excluded the LFC from being required to prepare and approve the pay policy before the end of the 31 March immediately preceding the financial year to which it relates.
- 1.3** DCLG published guidance (the 'guidance') in respect of these provisions of the Act in February 2012, and supplementary guidance in February 2013. The definition of "chief officers" used in the Act includes Directors, Assistant Commissioners, and Heads of Service. In March 2012, LFEPA agreed to extend its pay policy statement to also cover Deputy Assistant Commissioners (DACs) and other non-operational staff who constitute the LFC's 'Top Management Group' (TMG). This goes beyond the strict requirements of the Act but supports the recommendation, set out in paragraph 17 of the guidance, that the LFC should consider whether it "would be appropriate to extend the scope of their pay policy statement to include highly paid members of staff who would not come within the definition of chief officers". All such posts are governed by the same policies applicable to pay and reward, and the extension of the pay policy statement to cover these staff does not affect either their remuneration or conditions of service, nor does it alter the information within the public domain.
- 1.4** Pay policy statements between 2012 and 2017 also included the Commissioner for Fire and Emergency Planning within its definition of "chief officers" as the Commissioner for Fire and Emergency Planning was directly accountable to LFEPA. However, with effect from 1 April 2018, the individual holding the office of LFC has been appointed by the Mayor of London

and no longer fits within the legislative definition. Nevertheless in accordance with paragraph 15 of the guidance which states that 'it is essential an authority's approach to pay, as set out in a pay policy statement, is accessible for citizens and enables local taxpayers to take an informed view of whether local decisions on all aspects of remuneration are fair and make best use of public funds', the Commissioner's earnings have been included in paragraphs 13.3 and 13.4 of appendix 1 which provide pay multiplier details between the highest paid and median earnings.

- 1.5 It will be noted from paragraphs 4.4 and 5.1 of the appendix 1 Pay Policy statement that the cost-of-living pay increase and salary progression arrangements to apply to TMG staff from 1 April 2026 are still under discussion with the respective trade union. The cost-of-living increase for FRS staff from 1 April 2026 including the salary progression increase from 1 July 2026, are also under discussion with the respective trade unions. As and when these matters are resolved the pay policy statement will be updated.
- 1.6 There is a change to the policy statement when compared to last year's in that to keep the policy statement accurate and up to date for 2026/27, the references in paragraph 9.1 to historic cases where approval not to abate pensions within the LFC discretion was approved has been removed, but it is recorded in the policy document history as set out in page 15 for transparency. The policy also includes reference to the HM Treasury Special Severance Payments published in November 20025.

2 Objectives and expected outcomes

- 2.1 The recommendation within this report, and therefore the expected outcome, is for the LFC to approve the pay policy statement at appendix 1 to achieve the objective to meet its statutory obligations under the Localism Act 2011.

3 Values

- 3.1 The LFC notes the Fire Standards Board requirements around adopting and embedding the Core Code of Ethics at an individual and corporate level. Following extensive engagement, the LFC has introduced Brigade values which build on and do not detract from the Code of Ethics.
- 3.2 The pay policy statement 2026/27 set out in appendix 1 primarily applies the values of service and integrity by complying with its statutory duty, and beyond, through transparently communicating its equitable pay related arrangements.
- 3.3 The Brigade values are:
 - Service: we put the public first
 - Integrity: we act with honesty
 - Teamwork: we work together and include everyone
 - Equity: we treat everyone fairly according to their needs
 - Courage: we step up to the challenge
 - Learning: we listen so that we can improve

4 Equality comments

- 4.1 The LFC and the Deputy Mayor for Planning, Regeneration and the Fire Service are required to have due regard to the Public Sector Equality Duty (section 149 of the Equality Act 2010) when taking decisions. This in broad terms involves understanding the potential impact of policy and decisions on different people, taking this into account and then evidencing how decisions were reached.

- 4.2** It is important to note that consideration of the Public Sector Equality Duty is not a one-off task. The duty must be fulfilled before taking a decision, at the time of taking a decision, and after the decision has been taken.
- 4.3** The protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership (but only in respect of the requirements to have due regard to the need to eliminate discrimination), race (ethnic or national origins, colour or nationality), religion or belief (including lack of belief), sex, and sexual orientation.
- 4.4** The Public Sector Equality Duty requires decision-takers in the exercise of all their functions, to have due regard to the need to:
- eliminate discrimination, harassment and victimisation and other prohibited conduct.
 - advance equality of opportunity between people who share a relevant protected characteristic and persons who do not share it.
 - foster good relations between people who share a relevant protected characteristic and persons who do not share it.
- 4.5** Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:
- remove or minimise disadvantages suffered by persons who share a relevant protected characteristic where those disadvantages are connected to that characteristic.
 - take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it.
 - encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
- 4.6** The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.
- 4.7** Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:
- tackle prejudice
 - promote understanding.
- 4.8** An Equality Impact Assessment (EIA) process has been undertaken in preparing the 2026/27 Pay Policy with no adverse impacts on staff within the protected characteristic groups and demonstrating compliance with the Public Sector Equality Duty. Although this pay policy does not, in and of itself, change any existing arrangements; it sets out arrangements which have previously been agreed and adopted. The principal terms and conditions of chief officers, including the policies and approach to remuneration, apply equally to all members of the Top Management Group.
- 4.9** The EIA data does show there is under representation amongst the Top Management Group from staff who are black, Asian and from other ethnic minorities, and to a lesser extent from staff who are women. The LFC's Diversity, Equity and Inclusion strategy sets out the arrangements for using equity metrics from the inclusion dashboard to support elevation to management interventions including for development, performance and progression. The LFC also publishes annually gender, disability and ethnicity pay gap action plans which bring together the key steps being taken to tackle the varying pay gaps across the Brigade.

5 Other considerations

Workforce comments

5.1 The subject matter of this report is the LFC's policies and approach to the remuneration of its chief officers. The recognised trade unions, including Prospect, and the Equality Support Groups have been provided with the pay policy statement for formal consultation and engagement with no comments received to date. Comments received shall be considered, responded to and this report updated as it progresses through governance.

Sustainability comments

5.2 The pay policy, at paragraph 12.1, confirms that the pay of the lowest paid permanent Brigade staff always exceeds the London Living Wage which is in line with the requirements of the Living Wage Foundation to which the LFC is accredited and in line with the Mayoral commitments.

Procurement comments

5.3 There are no direct procurement implications arising from the recommendations within this report.

Communications comments

5.4 The pay policy statement will be published for communication externally and internally.

6 Financial comments

6.1 The assumptions underpinning the pay policy statement are budgeted for accordingly as part of the LFC's annual budget submissions.

7 Legal comments

7.1 Under section 9 of the Policing and Crime Act 2017, the London Fire Commissioner (the "Commissioner") is established as a corporation sole with the Mayor appointing the occupant of that office. The terms and conditions on which the London Fire Commissioner is appointed are determined by the Mayor with any such payments to the occupant of that office made by the London Fire Commissioner per schedule 27A of the Greater London Authority Act 1999.

7.2 Section 38 of the Localism Act 2011 (the 2011 Act) requires that pay policy statements must be published by a relevant authority. The LFC is a relevant authority by application of s43 (1)(g) of the 2011 Act.

7.3 Section 38 states, inter alia, that pay policy statements must set out the LFC's policies for:

- the remuneration of its chief officers,
- the remuneration of its lowest-paid employees, and
- the relationship between—
 - i. the remuneration of its chief officers, and
 - ii. the remuneration of its employees who are not chief officers.

7.4 The Government have published statutory guidance (the Guidance) on pay policy statements, this sets out that:

"The definition of chief officers (as set out in section 43(2)) is not limited to heads of paid service or statutory chief officers. It also includes those who report directly to the

head of paid service or statutory chief officers (non-statutory chief officers), to those who report directly to non-statutory chief officers (deputy chief officers) and, in the case of a Fire and Rescue Authority, a Deputy Chief Fire Officer. Authorities are reminded that the Act sets out the information that they are required to include in their pay policy statements as a minimum. Authorities should consider whether, in the light of local circumstance and their own reward structure, it would be appropriate to extend the scope of their pay policy statement to include any other highly paid members of staff who would not come within the definition of chief officers."

7.5 The Pay Policy Statement attached to this report at Appendix 1 both meets the legislative requirements of the 2011 Act as well as considering and applying the requirements of the Guidance.

7.6 The Commissioner is also required to comply with the provisions of the Local Audit and Accountability Act 2014 ("2014 Act") and subsidiary legislation and guidance by virtue of Schedule 2 of the 2014 Act. This includes the Accounts and Audit Regulations 2015 issued under the 2014 Act, which require the Commissioner to publish the following information:

- The number of employees whose remuneration is at least £50,000 in brackets of £5,000;
- Details of remuneration and job title of 'senior employees' whose salary is at least £50,000; and
- The names of employees whose salaries are £150,000 or more.

7.7 The Pay Policy Statement attached includes provision for the LFC to comply with these requirements set out above.

7.8 The Local Government Transparency Code 2015, issued and applies to the Commissioner under section 2 of the Local Government, Planning and Land Act 1980, places further requirements on the Commissioner to:

"...place a link on their website to these published data or place the data itself on their website, together with a list of responsibilities (for example, the services and functions they are responsible for, budget held and number of staff) and details of bonuses and 'benefits-in-kind', for all employees whose salary exceeds £50,000. The key differences between the requirements under this Code and the Regulations referred to above is the addition of a list of responsibilities, the inclusion of bonus details for all senior employees whose salary exceeds £50,000 and publication of the data on the authority's website."

7.9 The Pay Policy Statement attached includes provision for the LFC to comply with the aforementioned requirements.

7.10 The LFC Scheme of Governance gives delegated authority to the Head of Service to approve changes to policies and procedures of which they are the designated custodian. However, given the specific statutory duties outlined above, the pay policy statement attached at Appendix 1 will be presented to the LFC for final approval prior to publication.

7.11 This report seeks approval of the pay policy statement (Local Pay Policy) set out in Appendix 1 to the report.

List of appendices

Appendix	Title	Open or confidential*
1	Pay Policy Statement 2026/27	Open
2	Equality Impact Assessment	Open

Part two confidentiality

Only the facts or advice considered to be exempt from disclosure under the FOI Act should be in the separate Part Two form, together with the legal rationale for non-publication.

Is there a Part Two form: NO

Pay policy statement 2025-26

New policy number: **821**
 Old instruction number:
 Issue date: **31 March 2013**
 Reviewed as current: **XXXX 2026**
 Owner: **Head of HR Operations and Systems, People Services**
 Responsible work team: **Policy, Pay and Reward**

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1 Introduction

- 1.1 This policy sets out the London Fire Commissioner's (LFC's) pay policy statement in accordance with the Localism Act 2011 (the 'Act') and DCLG's guidance under section 40 of the Localism Act 'openness and accountability in local pay' (the 'guidance').
- 1.2 It brings together in one statement and supporting documents the policies regarding pay and core terms and conditions of both the LFC's most senior managers and its lowest paid employees.
- 1.3 Under the Local Government Transparency Code 2015, the provisions relating to senior salaries, the LFC publishes the following:
 - The number of employees whose remuneration is at least £50,000 in brackets of £5,000;
 - details of remuneration and job title of 'senior employees' whose salary is at least £50,000 (i.e. the top three levels of the organisation, as set out in the last top management review (2015)); and
 - the names of employees whose salaries are £150,000 or more.
- 1.4 This information is also included in the LFC's published annual accounts ('Statement of Accounts') on the LFB website.
- 1.5 In line with the guidance, the LFC's "chief officer" pay policy has been extended from those chief officers defined in the Act to cover all of its top management group.
- 1.6 Links to all relevant LFC documents mentioned in this pay policy statement are set out below in the 'related documents' section of this statement.

2 London Fire Commissioner's strategic objectives

- 2.1 The LFC is committed to transparency in regard to the employment of all its staff. This policy meets the statutory requirements in part 1, chapter 8 of the Act to publish a pay policy statement.

3 Definitions

- 3.1 In this policy "chief officers" means the top management group, i.e.:
 - the deputy commissioner/operational director (2)
 - the non-operational directors (3)
 - the assistant commissioners (6)
 - the deputy assistant commissioners (17)
 - the assistant directors and other non-operational heads of service (12)
 - the other non-operational members of the top management group (17)
- 3.2 In this policy "lowest paid" means the definition set out in paragraph 12.1 below.

Note. Figures in brackets () in this paragraph represent the number of established posts with effect from 1 April 2026.

4 Top management pay determination

- 4.1 The top management group (TMG) pay structure which applies with effect from 1 April 2016 was agreed by the London Fire and Emergency Planning Authority (LFEPA) in March 2016 (FEP 2591). The pay structure is based on a recommended structure submitted by Hay consultants and involves different tiers in the structure. Hay have undertaken a job evaluation of all these senior roles.
- 4.2 All new posts or changes to existing posts arising from changed responsibilities within the top management group are submitted to Hay consultants for evaluation and allocated to the appropriate grade in the structure. Where staff within the grade group take on additional responsibilities they may receive a special responsibility allowance in accordance with the LFC's [Policy number 563](#) – Special responsibility allowances policy.

- 4.3 The pay structure uses the London public and not-for-profit sector median as the benchmark.
- 4.4 General pay reviews, and increases to salary range maxima and minima, apply on 1 April each year; the review scheduled for 1 April 2026 is still under negotiation¹. The pay formulae are set out within FEP 2591, Appendix B. Under the general pay review, the 2016 agreement was for basic pay for top managers to increase by the Government's public sector pay policy for the duration of the current parliament. Up until September 2017 this was 1%, however in that month the government announced the end of the 1% pay policy. With the ending of Government public sector pay policy, TMG pay is negotiated locally with 'Prospect', the sole trade union recognised for collective bargaining purposes. Salary maxima and minima increase by the greater of the long-term trend increase in either (a) the median of London public and not-for-profit sector salaries, or (b) government pay policy².

5 Pay progression and performance related pay

- 5.1 The long-term arrangements for pay progression for the TMG are currently under discussion with Prospect, as are the interim arrangements for pay progression in 2025/26. This includes the arrangements under which TMG staff who have been at the maximum of their pay band for at least 12 months receive a non-consolidated performance payment.¹
- 5.2 The existing arrangements for newly-appointed Assistant Commissioners and Deputy Assistant Commissioners to progress to their respective 'competent' rates once signed off in role continue to apply. The majority of ACs and DACs are expected to be signed off in role within 12 months of appointment.

6 Changes to terms and conditions

- 6.1 The terms and conditions of staff within the top management group are determined through the TMG Consultative Forum where, as noted above, paragraph 4.4, the sole trade union recognised for collective bargaining purposes is Prospect.

7 Benefits and expenses

- 7.1 Operational officers within the scope of this statement are required to have a suitable vehicle for the conduct of their operational duties. They are contractually required to either use their own vehicle, in which case they will belong to the essential car user scheme or they will lease a car, in which case they will belong to the LFC's lease car scheme. Non-operational officers who are required to use their vehicle on LFC business normally belong to the LFC's casual car scheme. The terms and conditions are as set out in the LFC's car schemes [Policy number 770](#) – Brigade car schemes policy.
- 7.2 All officers within the scope of this agreement are entitled to receive payment for membership of one professional association in accordance with the LFC's professional associations membership provisions - <https://londonfire.sharepoint.com/sites/HW-WorkingHere/SitePages/Claim-expenses.aspx>. Individual staff with a prior contractual agreement to the payment of more than one membership subscription will maintain this commitment on a personal basis.
- 7.3 Officers are entitled to recompense of receipted expenses in accordance with the LFC's expenses [Policy number 514](#) - Subsistence and public transport expenses policy.

8 Enhancement at termination

- 8.1 In cases of redundancy affecting non-operational staff within the scope of this policy statement, such staff are covered by the LFC's redundancy compensation scheme ([Policy number 562](#) - Redundancy and redeployment policy (FRS and control staff), section 8). That scheme provides that staff who agree to severance are entitled to receive redundancy pay based on their actual weekly rate of pay multiplied by the statutory multiplier, plus an additional £10,000 lump sum (pro rata for part-time employees). In cases where an employee does not agree to accept severance then they will receive statutory minimum redundancy pay. The LFC has published policies in regard to the exercise of discretion within the Local Government Pension Scheme (LGPS) which could be applied on request to members of the LGPS.

¹ To be updated when this is settled.

² Currently under discussion with Prospect, and the Pay Policy will be amended if this changes.

- 8.2 On 12 February 2021 the government announced that it would be revoking the *Public Sector Exit Payments Regulations 2020*, which place a £95,000 cap on public sector exit payments. The announcement also stated that 'HM Treasury will bring forward proposals at pace to tackle unjustified exit payments'. On 12 May 2022 statutory guidance on the making and disclosure of Special Severance Payments was published. This sets out parameters on termination payments within the public sector, and includes governance and publication provisions. The LFC is required to adhere to this statutory guidance. In addition the HM Treasury published its guidance on Public Sector Payments: Use of Special Severance Payments in November 2025 that is also relevant.
- 8.3 Operational officers have no access to a redundancy compensation scheme and therefore statutory provisions would apply in the event of a redundancy. It has been agreed to extend the scheme applicable to non-operational staff to operational staff in the event that regulations are enacted enabling the LFC to pay enhanced terms (FEP2023).

9 Abatement of pensions

- 9.1 Unless there are exceptional circumstances, LFC's policy is to abate an employee's pension where the scheme rules provide for it, where the employee is a pensioner of the LFC and the combined remuneration from pay and pension exceeds the final pensionable salary of the employee.
- 9.2 In cases where the pensioner is not an ex-LFC employee the LFC will seek to secure employment on terms whereby the rate of pay and pension received by the individual does not exceed their final pensionable salary unless there are exceptional circumstances.

10 Re-employment

- 10.1 The LFC endorses the Home Office's policy position which is included in the Fire and Rescue National Framework (May 2018), i.e. fire and rescue authorities must not re-appoint principal fire officers after retirement to their previous, or a similar, post save for in exceptional circumstances when such a decision is necessary in the interests of public safety. Any such appointment must be transparent, justifiable and time-limited. In the exceptional circumstance that a re-appointment is necessary in the interests of public safety, this decision should be subject to agreement by a public vote of the elected members of the fire and rescue authority, or a publicised decision by the appropriate elected representative of the fire and rescue authority, taking into account the legislative requirements of PCC (Police and Crime Commissioner) FRA (Fire and Rescue Authority) Chief Fire Officer appointment procedures. The reason why the re-appointment was necessary in the interests of public safety, and alternative approaches were deemed not appropriate, must be published and the principal's fire officer's pension must be abated until they cease to be employed by the fire and rescue authority.
- 10.2 Otherwise, staff who have retired or been made redundant are entitled to apply for any openly advertised role on the same basis as any other potential candidate and will be offered appointment if they are the best candidate for the role.
- 10.3 The Home Office's policy position also states that, to ensure greater fairness and the exchange of talent and ideas, all principal fire officer posts must be open to competition nationally, and fire and rescue authorities must take account of this in their workforce planning, and that fire and rescue authorities are expected to have regard to this principle when re-appointing at any rank. This policy position is also endorsed by the LFC: all operational Director, Assistant Commissioner, and Deputy Assistant Commissioner positions are open to competition nationally.

11 Tax avoidance - 'IR35'

- 11.1 The LFC's policy is not to directly engage staff who work through their own personal service company (PSC). The LFC's policy is to comply with all HM Revenue and Customs (HMRC) guidance and rules, and therefore complies with the 'IR35' (the 'intermediaries legislation') changes, introduced in April 2017. The intention of this legislation is to ensure that individuals who work through their own company in the public sector, but in an employee-type role, whether contracted directly by an organisation or through an intermediary such as an agency, pay employment taxes in a similar way to direct employees. The LFC may engage agency staff who work through their own PSC, but such staff must meet the required HMRC tests,

including the HMRC online tool ('Check employment status for tax' – CEST), to ensure their engagement meets the IR35 rules.

12 Lowest paid staff

- 12.1 The lowest grade of non-operational permanent employees is FRS B which has an inclusive salary range of £31,132 to £36,723 p.a. (subject to an outstanding pay review wef. 01/04/2026). The lowest role/grade of operational staff is Firefighter Development which has a spot rate salary of £37,402 p.a.. The lowest grade of Control staff is Probationer Control Officer which has a spot rate salary of £39,880.66 p.a. The LFC's approach to the reward of its lowest paid has been to ensure that its lowest permanent rate of pay exceeds the London Living Wage and that all its non-operational FRS staff are employed on single status conditions of service. It negotiates the remuneration of its lowest paid staff with its recognised trades unions – for non-operational staff this is the GMB and Unison, with the FBU also recognised for Control staff; for operational staff this is the Fire Brigades Union (FBU). The LFC has operated a business apprenticeship scheme and these apprentices are paid at the London Living Wage.

13 Pay multiple

- 13.1 Under the guidance, it is recommended that local authority pay policy statements should include the authority's policy on pay dispersion – the relationship between remuneration of chief officers and the remuneration of other staff. The guidance recommends that the pay multiple (sometimes called 'pay ratio') is included in these statements as a way of illustrating the authority's approach to pay dispersion.
- 13.2 Under the Local Government Transparency Code 2015, local authorities must publish this pay multiple, defined as the ratio between the highest paid taxable earnings for the given year (including base salary, variable pay, bonuses, allowances and the cash value of any benefits-in-kind) and the median earnings figure of the whole of the authority's workforce. The measure must:
- Cover all elements of remuneration that can be valued (e.g. all taxable earnings for the given year, including base salary, variable pay, bonuses, allowances and the cash value of any benefits-in-kind);
 - use the median earnings figure as the denominator, which should be that of all employees of the local authority on a fixed date each year, coinciding with reporting at the end of the financial year; and
 - exclude changes in pension benefits, which due to their variety and complexity cannot be accurately included in a pay multiple disclosure.
- 13.3 Based on the above, the pay multiple between the highest paid employee and median earnings for 2025/26 (i.e. coinciding with the end of the 2025/26 financial year) was: 3.7. The pay multiple between the London Fire Commissioner and median earnings in 2025/26 was: 4.6.
- 13.4 The maximum multiplier in 2025/26 for the relationship between the highest paid employee/LFC and median earnings is set at: **5** and **6** respectively.
- 13.5 The LFC will seek to keep within these multipliers. These are regarded as sufficient to cover any changes which may naturally occur in regard to staff movements or pay awards which might affect the multipliers during the twelve months.

14 Review

- 14.1 This pay policy statement will be reviewed annually by the London Fire Commissioner (LFC) in April each year, and the pay policy statement may be amended by the LFC at any time during the course of the year and will be updated to reflect any statutory changes between annual reviews.

15 Help and Support

- 15.1 Please contact the HR Helpdesk on extension 89100 option 3 and by email to IT.HR@london-fire.gov.uk.
- 15.2 This policy may also be available on request in other alternative accessible formats as set out in [Policy number 290](#) – Guidance note on translation and interpretation. Please contact Communications on extension 30753 and by email to communications.team@london-fire.gov.uk to discuss your needs and options.

Document history

Assessments

An equality, sustainability or health, safety and welfare impact assessment and/or a risk assessment was last completed on:

EIA	08/05/2026	SDIA	H- 09/02/2026	HSWIA	09/02/2026	RA	N/A
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Audit trail

Listed below is a brief audit trail, detailing amendments made to this policy/procedure.

Page/para nos.	Brief description of change	Date
Throughout	This policy has had major changes please read to familiarise yourself with the content.	14/05/2013
Page 2 para 1.5	Related documents section has been reinstated in this paragraph.	15/05/2013
Page 5 para 15	Links updated to related documents.	20/06/2013
Throughout	Head of Communications post has been deleted, content updated to Head of Media and Internal Communications to reflect changes.	28/02/2014
Throughout Page 4 para 6 Page 5 para 9.1 Page 5 para 12.1	Staff numbers, appropriate figures and dates altered to reflect current positions. Heads of Service rolled in to one title and role of CAMS Project Director added. Additional sentence re extension of redundancy enhancement. Altered lowest comparator to FRS B, adding the Apprentices in too.	31/03/2014
Page 5 para 10.1	Typo corrected to accord with FEP2231, para 20.	15/04/2014
Page 7	'Subjects list' table - template updated.	05/12/2014
Throughout	Policy updated throughout, please re-read to familiarise yourself with content.	31/03/2015
Page 6, para 13.3 – 13.5	Minor amendment to update financial year.	21/04/2015
Throughout	Amendments to reflect Authority decisions on the Top Management Pay and Grading review (FEP 2591), plus other minor updates, including for the financial year. Reviewed as current.	31/03/2016
Throughout	General updating as agreed by the Authority (FEP 2712), plus 2016/17 pay multiple data.	31/03/2017
Page 6, para 14.3	Correction of Pay Multiple (Ratio) to be consistent with the Pay Multiple published for the Mayor's Annual Report for 2016/17.	27/10/2017
Throughout	General updating as agreed by the LFC, also reflecting the governance changes implemented on 01/04/18.	20/11/2018
Throughout	This policy has been reviewed as current with minor changes made throughout. Please re-read to familiarise yourself with the content.	23/05/2019
Throughout	Reviewed as current with general updating in line with annual review by LFC. Please re-read to familiarise yourself with the content.	13/05/2020

Page/para nos.	Brief description of change	Date
Throughout	Reviewed as current with general updating in line with annual review by LFC. Please re-read to familiarise yourself with the content.	22/04/2021
Throughout	Reviewed as current with general updating in line with annual review by LFC. Please re-read to familiarise yourself with the content.	05/07/2022
Throughout	Reviewed as current with general updating in line with annual review by LFC. Please re-read to familiarise yourself with the content. SDIA and HSWIA updated.	12/06/2023
Throughout	Reviewed as current with general updating in line with annual review by LFC. Please re-read to familiarise yourself with the content.	17/06/2024
Throughout	Reviewed as current with general updating in line with annual review by LFC. Please re-read to familiarise yourself with the content.	28/07/2025
Page 7	SDIA and HSWIA updated.	11/02/2026
Throughout Page 4, para 8.2 Page 4, para 9.1	Reviewed as current with general updating in line with annual review by LFC. Please re-read to familiarise yourself with the content. HM Treasury guidance on Public Sector Severance Payments added. Historic reference to 'Between November 2017 and September 2020, the LFC did not apply abatement to re-employed fire safety inspecting officers and other suitably qualified fire safety specialist officers due to skills shortages and fire safety work volumes following the Grenfell Tower incident. From September 2020 normal abatement provisions had been re-instated in Fire Safety, and therefore applied across all departments until October 2023 when abatement was not applied to re-employed fire safety specialist officers due to skills shortages and work volumes as set out in LFC-23-061.' removed.	XXXXXX

Subject list

You can find this policy under the following subjects.

Pay	Salaries
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Freedom of Information Act exemptions

This policy/procedure has been securely marked due to:

Considered by: (responsible work team)	FOIA exemption	Security marking classification



LONDON FIRE BRIGADE

Equality Impact Assessment (EIA) Initial Screening Form

When completing this form please use the [EIA guidance notes](#) and check our other resources on our dedicated [EIA Hotwire pages](#)

This form enables you to screen each protected characteristic and identify which may be positively or negatively impacted by your activity.

The purpose of an EIA is to meet and justify the legal obligation required under the [Public Sector Equality Duty](#) (PSED), namely, the ‘DUE REGARD’ that documents that your activity will:

- a) eliminate discrimination, harassment, and victimisation;**
- b) advance equality of opportunity; and,**
- c) foster good relations between people who share a relevant protected characteristic and people who do not share it.**

You must be able to show that your activity meets the three conditions of the due regard by providing relevant information to show how it caters for people with protected characteristics (where applicable), through eliminating potential discrimination and promoting opportunities to build equity between all groups.

You will only be required to complete a full EIA assessment of the areas where you have identified a negative impact, and further adjustments will be required.

Use the fields below to record any impacts and potential mitigating actions against each protected characteristic. All complete initial screening forms should be submitted to the EIA team to review and confirm your next steps.

A. Name, status and expected outcomes of the activity

The Pay policy statement 2026/27 sets out the London Fire Commissioner's (LFC's) pay policy statement in accordance with the Localism Act 2011 (the 'Act') and DCLG's guidance under section 40 of the Localism Act 'openness and accountability in local pay' (the 'guidance').

It brings together in one statement and supporting documents the policies regarding pay and core terms and conditions of both the LFC's most senior managers and its lowest paid employees

B. Who is this activity for, who is impacted by it? *(all LFB staff, specific department, external communities)*

All LFB staff.

C. Reason for Equality Impact Assessment

Undertaking a review of the existing activity.

D. Team responsible for the activity *(Please provide two different names for resilience)*

EIA Author(s):

Name: Paul Doyle

Job title: Pay, Reward and IR manager

Department: Pay, Policy, Reward and I.R.

EIA Owner(s):

Name: Andrew Cross

Job title: Head of HR operations & systems

Department: HR operations & systems

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E. Equality and diversity considerations					
Protected Characteristic	Positive Impact ✓	Negative Impact ✓	Summary of impact	Is a mitigating action required?	
				Yes	No
Age	☒	☐	The policy provisions have no age restrictions across any of these age ranges so eliminates discrimination and provides advancement of opportunity for those minority age groups by having access. Having no age restrictions promotes good relations between the age ranges providing opportunity for all staff to access their related provisions together. Individual EIAs have been carried out for each separate pay related policy.	☐	☒
Disability	☒	☐	The policy provisions have no direct barriers for those staff who have declared a disability (9.3%) and this policy is to be applied in line with the PN1005 Supporting health and wellbeing policy so that workplace adjustments can be considered/provided as well as recorded on the new workplace adjustment passport. This eliminates discrimination and provides advancement of opportunity for those with a disability (9.3%) to access these provisions This in turn means that those with this protected characteristic and those without can access their related provisions together fostering good relations. Individual EIAs have been carried out for each separate pay related policy.	☐	☒
Gender Reassignment	☒	☐	The LFB does not currently record EDI staff data for gender reassignment but for the purposes of this EIA, it has been considered there are trans staff within the workforce across all staffing groups.	☐	☒

			The policy provisions have no gender reassignment restrictions so eliminates discrimination and provides advancement of opportunity. Having no restrictions promotes good relations between the genders providing opportunity for all staff to access their related provisions together. The LFB does have staff who have and are transitioning and the PN323 Trans Inclusion policy has been applied within these provisions and there are no barriers identified that cannot be managed within PN323 when applied to this policy.		
Marriage / Civil Partnership	☒	☐	The LFB does not currently record EDI staff data for marriage and civil partnership but for the purposes of this EIA, it has been considered there are staff married and in a civil partnership within the workforce across all staffing groups. The policy provisions have no restrictions for those with these characteristics and those who do not so eliminates discrimination and provides advancement of opportunity for those with that do by having access. Having no restrictions promotes good relations between those that are married, in civil partnerships and those who are not by providing opportunity for all staff to access their related provisions together. Individual EIAs have been carried out for each separate pay related policy.	☐	☒
Pregnancy / Maternity	☒	☐	The LFB does not currently record EDI staff data for pregnancy and maternity but for the purposes of this EIA, it has been considered there are/have been staff pregnant and/or on maternity within the workforce across all staffing groups. The policy provisions have no restrictions for those with these characteristics so eliminates discrimination and provides advancement of opportunity for those with that do by having access. PN555 and PN313 supports this policy and provides for adjustments to support to access to these provisions. Thereby having access promotes good relations between those that are pregnant/maternity and those	☐	☒

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			who are not by providing opportunity for all staff to access their related provisions together. Individual EIAs have been carried out for each separate pay related policy.		
Race	☒	☐	The policy provisions have no race/ethnicity/nationality restrictions across any of these characteristics so eliminates discrimination and provides advancement of opportunity for those groups within the minority by having access. Having no restrictions promotes good relations between the staff and their different races, ethnicities and nationalities providing opportunity for all staff to access their related provisions together. Individual EIAs have been carried out for each separate pay related policy. PN973 Equity policy and its provisions apply to this policy ensuring support.	☐	☒
Religion / Belief	☒	☐	The policy provisions have no religion or belief restrictions across any of these characteristics so eliminates discrimination and provides advancement of opportunity for those groups within the minorities by having access. Having no restrictions promotes good relations between the staff and their different races, ethnicities and nationalities providing opportunity for all staff to access their related provisions together. PN973 Equity policy and its provisions apply to this policy ensuring support. Individual EIAs have been carried out for each separate pay related policy.	☐	☒
Sex	☒	☐	The policy provisions have no gender restrictions across between the mix of genders so eliminates discrimination and provides advancement of opportunity for those in the female minority. Having no gender restrictions promotes good	☐	☒

			relations between the genders providing opportunity for all staff to access their related provisions together. Individual EIAs have been carried out for each separate pay related policy.		
Sexual Orientation	☒	☐	The Brigade data refers to LGB. The policy provisions have no sexual orientation restrictions for the 6% of the workforce recorded as LGB so eliminates discrimination and provides advancement of opportunity for those in this minority of the workforce. Having no sexual orientation restrictions promotes good relations between the genders providing opportunity for all staff to access their related pay provisions together. Individual EIAs have been carried out for each separate pay related policy.	☐	☒
Socio Economic*	☒	☐	The LFB does not currently record EDI staff data for socio-economic backgrounds but for the purposes of this EIA, this has been considered within the workforce across all staffing groups. The policy applies the PN973 Equity policy and does not create barriers because it applies to all employees capturing the widest selection of staff possible. There are no restrictions such as qualifications and the provisions are communicated using inclusive language so that they are clear. The provisions facilitate staff with various socio-economic backgrounds to interact in line with PN973 positively. Individual EIAs have been carried out for each separate pay related policy.	☐	☒
Caring responsibilities*	☒	☐	The LFB does not currently record EDI staff data for caring responsibilities but for the purposes of this EIA, it has been considered that there are staff with caring responsibilities within the workforce across all staffing groups. These responsibilities are within the Carer Act and extend beyond it. The policy provisions have no restrictions for staff with caring responsibilities so eliminates discrimination and provides advancement of opportunity for those in	☐	☒

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			this minority of the workforce. Having no caring responsibility restrictions promotes good relations providing opportunity for all staff to access their related provisions together. Individual EIAs have been carried out for each separate pay related policy.		
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Explain why a full EIA is not required:

The Pay Policy Statement is a high-level, statutory document that provides a transparent annual summary of the organisation's existing pay arrangements and practices. It does not introduce new pay structures, terms, conditions or decision-making processes. As such it does not in itself create new or additional impacts on employees or other stakeholders with protected characteristics under the Equality Act 2010.

All underlying pay-related policies and procedures referenced within the Pay Policy Statement have been subject to their own individual Equality Impact Assessments which have been completed and reviewed in line with LFB and legislative requirements. These assessments have demonstrate compliance with the Public Sector Equality Duty to eliminate discrimination, advance equality of opportunity and foster good relations.

The screening assessment for the updated Pay Policy Statement confirms that the document maintains a positive and neutral equality impact by continuing to reflect pay practices that are fair, transparent and consistently applied. As the annual update reflects factual updates, legislative requirements and previously assessed arrangements rather than substantive policy change, a full Equality Impact Assessment would be disproportionate and would not provide additional insight or mitigation beyond that already established.

The Pay Policy Statement will continue to be reviewed annually, alongside ongoing monitoring of pay outcomes and workforce data, to ensure continued compliance with equality legislation and alignment with the organisation's commitment to fairness and inclusion. Any future substantive changes to pay arrangements would be subject to a full Equality Impact Assessment as appropriate.

Signed by the Submitter

Name: Andrew Cross

Rank/Grade: TMG C

Date: 06/05/26

Email the completed form to **EqualityImpactAssessment@london-fire.gov.uk**
To be completed by the EIA team, and returned to the submitter:

Initial Recommendations

☐ **Further information required**

Insufficient information to support a recommendation

☒ **Continue with no change required [Recommendation 1]**

No adverse impact(s) identified and full explanations provided

☐ **Full EIA required for affected characteristic before proceeding further**

Adverse impact(s) identified

Next steps

No further action

Name: Tanya Wijesinghe

Date: 7/5/26

Name: Ehis Ilozobhie

Date: 7/5/26

Amendments Post Sign Off