

Revised Discipline Policy PN392

Report to:

Commissioner's Board 7 July 2026
London Fire Commissioner

Date:

Report by:

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Authorising Head of Service:

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Report classification:

For decision

For publication

Values met

Service
Integrity
Teamwork
Equity
Courage
Learning

PART ONE

Non-confidential facts and advice to the decision-maker

Executive Summary

This report proposes updates to the London Fire Commissioner's (LFC) Discipline (Conduct) Procedure PN392 (the Discipline Policy); most particularly to realign the policy to the Advisory, Conciliation and Arbitration Service (ACAS) Code of Practice on disciplinary procedures, as well as the National Joint Council (NJC) Grey Book Seventh Edition.

The revised policy provides a clear and consistent approach to managing conduct matters, with a greater focus on early intervention and informal resolution, where appropriate. It aims to ensure that everyone is treated fairly, that concerns are addressed appropriately and that managers have the guidance they need to make balanced and consistent decisions.

Recommended decision

That the London Fire Commissioner

- i) Agrees the revised Discipline (Conduct) Procedure PN392 attached as Appendix 1

1 Introduction and background

- 1.1 The discipline policy was issued in February 2024 following the introduction of the Professional Standards Unit (PSU). The policy was drafted based upon advice and learnings taken from the National Crime Agency (NCA) model of handling allegations of misconduct.
- 1.2 In November 2024, HMICFRS published their report following their inspection of London Fire Brigade (LFB). Within which two Areas for Improvement (AFI) were highlighted that relate to the actions of the PSU and the associated discipline policy:
 - The brigade should carry out a review of brigade processes designed to deal with behaviour such as bullying and discrimination and implement improvements that build trust and confidence among staff
 - The brigade should make sure the processes it has put in place to deal with staff grievances and behaviour such as bullying or harassment improve trust and confidence among staff.
- 1.3 The Head of Professional Standards joined LFB in April 2025, at which point a review was

commissioned into the existing discipline policy, to establish its suitability for a modern Brigade and its alignment to the ACAS code of practice and the Grey Book. Following an extensive review of sector and people best practice, and internal staff engagement, the revised discipline policy was shared with representative bodies for consultation in February 2026.

2 Objectives and expected outcomes

- 2.1** To provide an improved policy that is clearer, fairer, and easier to understand, whilst still highlighting the commitment to building trust and confidence through maintaining high standards of professionalism, respect and accountability across the Brigade.

3 Values Comments

- 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 discipline policy has been developed in line with the Brigade values, highlighting their significance in the handling of allegations of misconduct, with reminders for staff of the consequences of failing to uphold the expected standards.

- 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) was undertaken during the development of the revised discipline policy. The assessment was informed by engagement with representative bodies, staff networks, and internal stakeholders, together with feedback received throughout the consultation process. It considered the potential impact of the policy on employees with protected characteristics and helped ensure that the revised policy promotes fairness, consistency, transparency, and equitable decision making.

4.9 The EIA informed both the policy and its supporting guidance by identifying opportunities to improve clarity, accessibility, and procedural safeguards where appropriate. This included measures to promote consistency in decision making, encourage early resolution where appropriate, and ensure access to appropriate support throughout the disciplinary process. The EIA will continue to be reviewed as part of the policy's ongoing monitoring to ensure it remains effective and continues to support equality, diversity, and inclusion.

5 Other considerations

Workforce comments

- 5.1** The revised policy has been sent to representative bodies and has been subject to extended consultation, who all engaged constructively to ensure the policy better reflects the Brigades expected professional standards and alignment with the ACAS code of practice and the Grey Book.

Sustainability comments

- 5.2** There are no sustainability implications.

Procurement comments

- 5.3** There are no procurement implications.

Communications comments

- 5.4** Changes to the Discipline Policy will be communicated to LFB colleagues through a range of channels. Detailed briefings will be provided for specific groups of colleagues, including senior leaders, and colleagues working in People Services and the PSU.
- 5.5** Key messages will highlight that the review has considered feedback received in order to develop a revised policy that is clearer, fairer, and easier to understand. It will also highlight the approach in relation to early intervention and informal resolution, where appropriate.
- 5.6** The policy will be made available on Hotwire, signposted with clear messages highlighting relevant points, such as when and how the policy should be used and what it covers. The policy will also be published on the Brigade's public-facing website.

6 Financial comments

- 6.1** The Chief Finance Officer has reviewed the report and has no comments.

7 Legal Comments

- 7.1** Under section 9 of the Policing and Crime Act 2017, the London Fire Commissioner (the "LFC") is established as a corporation sole with the Mayor appointing the occupant of that office. Section 1 of the Fire and Rescue Services Act 2004 states that the LFC is the fire and rescue authority for Greater London.
- 7.2** This report seeks approval for changes to Discipline (Conduct) Procedure PN392 (the Discipline Policy).
- 7.3** The statutory basis for the actions proposed in this report is provided by section 7 of the Fire and Rescue Services Act 2004, under which the LFC must secure the provision of personnel, services and equipment necessary to efficiently meet all normal requirements for firefighting and section 5A of that Act which allows the LFC to, amongst other things, do "anything it considers appropriate for purposes indirectly incidental to its functional purposes through any number of removes", this includes the issuing of police related to discipline and behaviour.

7.4 Part 4 (Delegation to Officers) of the LFC's Scheme of Governance delegates to Heads of Service the power to approve minor changes to policies and procedures for which they are the designated custodian but reserves the authority to approve non-minor changes to the LFC. The changes to this policy are non-minor, and therefore these changes should be approved by the LFC.

List of appendices

Appendix	Title	Open or confidential*
1	Discipline (Conduct) Procedure PN392	Open
2	Equality Impact Assessment (EIA)	Open
3	Health, Safety and Welfare Impact Assessment (HSWIA)	Open
4	Sustainable Development Impact Assessment (SDIA)	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

Disciplinary Procedure

New policy number: **0000**
Old instruction number:
Issue date: **XXXX**
Reviewed as current: **XXXX**
Owner: **Director, People Services**
Responsible work team: **Professional Standards Unit**

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1. Introduction

- 1.1 This policy sets out the LFB's Disciplinary Procedure, which applies to all employees, both uniformed and non-uniformed.
- 1.2 The disciplinary procedure provides a clear, fair and consistent framework for addressing concerns about conduct. It supports employees to meet required standards, promotes improvement and learning, and ensures that concerns are addressed promptly to maintain public trust.
- 1.3 This policy aligns with the LFB's Values and Behaviours Framework, the National Joint Council Grey Book for uniformed staff and the ACAS Code of Practice.
- 1.4 This policy should be read alongside the Disciplinary Procedure Guidance, which explains how the procedure is applied in practice. This is available in Hotwire.
- 1.5 The Professional Standards Unit will oversee the application of this procedure. For uniformed staff, relevant Grey Book provisions will apply where indicated. Managers remain responsible for addressing conduct issues at a local level, where appropriate, with support and advice from the Professional Standards Unit as required.

2. Standards of Conduct

- 2.1 Employees are expected to demonstrate standards of behaviour consistent with the LFB's values:

Service – We put the public first.

Courage – We step up to the challenge.

Learning – We listen so we can improve.

Teamwork – We work together and include everyone.

Equity – We treat everyone fairly and according to their needs.

Integrity – We act with honesty.

More information [here](#).

- 2.2 As an organisation serving London's diverse communities, the LFB expects a high standard of behaviour from all employees. This applies whether or not a role involves direct contact with the public, as confidence in the LFB depends on the standards we uphold as an organisation. Employees, when at work or identifiable as members of the LFB, must ensure that their conduct is professional and consistent with those standards. Conduct outside work must not bring the LFB into disrepute.

2.3 Zero Tolerance

The LFB operates a zero-tolerance approach to bullying, harassment, discrimination and victimisation. This includes behaviour that takes place in person, online or through other forms of communication. Concerns will be taken seriously and considered promptly to determine the most appropriate route, which may include management action, the grievance procedure or formal disciplinary investigation.

Zero tolerance does not mean every case will result in dismissal. It means concerns will be addressed consistently and proportionately, based on the evidence. Serious cases may amount to gross misconduct.

The LFB will take all reasonable steps to protect individuals who raise concerns or participate in investigations in good faith.

3. Scope

This procedure applies to misconduct and gross misconduct.

4. Misconduct

4.1 Misconduct refers to behaviour that falls below the standard expected of employees.

4.2 The disciplinary procedure is designed to cover behaviour which is contrary to that necessary for ensuring a safe and efficient workplace, and for maintaining good employment relations. Such behaviour could include, but is not limited to:

- bad behaviour, such as fighting or drunkenness
- unsatisfactory work performance
- harassment, victimisation or bullying
- misuse of company facilities (for example e-mail and internet)
- poor timekeeping
- unauthorised absences
- repeated or serious failure to follow instructions

In some circumstances, repeated or particularly serious instances of the above may be treated as gross misconduct, as set out in Section 5 of this policy.

4.3 The above list is not exhaustive and further illustrative examples of misconduct are set out in the Disciplinary Procedure Guidance.

5 Gross Misconduct

5.1 Gross misconduct is conduct of such seriousness that it may justify dismissal without notice.

5.2 Acts which constitute gross misconduct are those resulting in a serious breach of contractual terms. Examples of gross misconduct might include, but are not limited to:

- theft or fraud
- physical violence or bullying
- deliberate and serious damage to property
- serious misuse of the employer's property or name
- deliberately accessing pornographic, offensive or obscene material
- unlawful discrimination or harassment
- bringing the employer into serious disrepute
- serious incapacity at work brought on by misuse of alcohol or illegal drugs
- causing loss, damage or injury through serious negligence

- a serious breach of health and safety rules
- a serious breach of confidence

5.3 The above list is not exhaustive and further illustrative examples of gross misconduct are set out in the Disciplinary Procedure Guidance.

6. Time limits for employees raising concerns

- 6.1 This section applies to conduct concerns being considered under the disciplinary procedure, whether because they have been upheld through the grievance process or because they are sufficiently serious to be managed as potential misconduct from the outset.
- 6.2 Employees are encouraged to raise conduct concerns as soon as possible after an incident and should normally do so within three months. This helps to ensure fairness to all parties, as matters can be considered while evidence and recollection are clear.
- 6.3 Where an employee raises a concern after a longer period, the Head of PSU or their designated deputy will decide whether it is appropriate to investigate. In making this decision, the following factors will be considered:
- the reason for the delay
 - the seriousness of the allegation
 - how long ago the events occurred
 - the availability and reliability of evidence
 - whether witnesses remain available
- 6.4 Concerns raised late may not be investigated if it is no longer possible to conduct a fair and thorough process for all parties, as set out in 6.3.
- 6.5 Where the alleged conduct may involve potential criminal conduct or safeguarding concerns, the usual time expectation in section 6.2 may not apply in the same way. In such cases, the LFB will consider the circumstances and take appropriate action in line with relevant policies and legal obligations.
- 6.6 Decisions to proceed in these circumstances will be made by the Head of PSU or their designated deputy.

7. Disciplinary Procedure

- 7.1 Principles
- Fairness and natural justice: Matters will be handled impartially. Employees will know the case against them and will have the opportunity to respond before decisions are made.
 - Standard of proof: Decisions will be based on the balance of probabilities. This means the presiding manager must decide whether it is more likely than not that the alleged conduct occurred. Evidence must be sufficient, reliable and fairly considered.
 - Proportionate investigation: A reasonable investigation will take place before any hearing.
 - Proportionality of action: Disciplinary action will be dealt with at the lowest level appropriate, having regard to the nature and seriousness of the alleged conduct.
 - Timeliness: Matters will be progressed without unnecessary delay and updates provided as appropriate.

- Participation: Employees are expected to cooperate. If they unreasonably fail to engage, decisions may be made on available evidence.
- Support: The process will be managed sensitively, and employees may access appropriate support.
- Representation: Employees have the right to be accompanied at formal hearings, as set out in section 7.9.
- Information will be managed in accordance with Section 10 of this policy.

7.2 Informal Resolution

Minor conduct issues should normally be addressed locally by the line manager, where appropriate, and resolved informally wherever possible. Matters should be referred to the PSU where the behaviour may amount to misconduct requiring formal action, or where previous informal steps have not led to improvement.

Managers may seek advice from the PSU or their HR Business Partner where they are unsure whether a matter should be managed informally or referred for formal consideration.

7.3 Mediation

Mediation is a voluntary and confidential process in which an impartial third party helps individuals to discuss issues, improve understanding and, where possible, reach a mutually acceptable resolution.

Mediation may be used at any stage to help rebuild working relationships and prevent escalation.

Mediation may not be appropriate where the concerns involve alleged domestic abuse, sexual violence, serious harassment, coercive or controlling behaviour, safeguarding concerns, or any other circumstances where there may be a significant power imbalance between the parties. In such cases, the LFB will consider the most appropriate alternative action under this policy.

7.4 Formal Disciplinary Investigation

7.4.1 Roles and responsibilities

Local managers are responsible for addressing minor conduct issues at the informal stage and, where appropriate, for managing Stage One cases locally, including fact finding or investigation, with advice from HR Business Partners or the PSU as required.

The PSU is responsible for carrying out the initial assessment of matters referred for formal consideration and for advising on the appropriate route for each case considering the nature and seriousness of the alleged conduct and the information available at the time.

The PSU will lead formal investigations at Stage Two and Stage Three and provide support to presiding managers at formal hearings.

PSU Investigating Officers are responsible for carrying out proportionate investigations and preparing an investigation report for the PSU Commissioning Manager or their nominated deputy.

7.4.2 PSU Initial assessment

After an initial assessment, the PSU will decide whether the matter:

- should be managed informally at a local level by the line manager, where appropriate
- should proceed to the formal stage and be managed locally by the appropriate manager, normally at Stage One
- should proceed to the formal stage and be managed by the PSU, normally at Stage Two or Stage Three

The decision and rationale will be recorded. Where the matter does not meet the threshold for formal disciplinary action, the PSU will signpost the manager or individual to an appropriate alternative route.

7.4.3 Investigation standards and case management

- Investigations will be conducted fairly, proportionately and without unnecessary delay.
- The employee who is the subject of the investigation will be kept informed of progress in a timely manner. Updates will normally be provided at least every 28 days unless there are clear reasons why this is not possible.
- Where there is a complainant, they will be informed when the disciplinary process has concluded and whether their complaint has been upheld. Details of sanctions shall not be disclosed and information shared will be limited to what is necessary and proportionate.
- Information will only be shared with those who have a legitimate and proportionate need to know.
- Managers and Investigating Officers must manage investigations sensitively, consistently and impartially. Where appropriate, the PSU may commission an external investigator.
- Investigations will normally be concluded within twelve weeks of commencement. The time required will depend on the complexity of the case and the availability of those involved.
- Where completion within twelve weeks is not reasonably practicable, the Investigating Officer must provide a written explanation and revised completion plan to the PSU Commissioning Manager.
- In cases extending beyond twelve weeks, the Investigating Officer must provide written six-weekly progress updates to the PSU Commissioning Manager until the investigation is concluded.
- If new information materially changes the seriousness of the allegations, the Investigating Officer must refer the matter to the Head of PSU or their designated deputy. The employee who is the subject of the investigation will be kept informed.

7.5 Suspension

- Suspension is a neutral act and is not a disciplinary sanction.
- Suspension may be considered where necessary and should only be used as a last resort where no reasonable alternatives are available, such as temporary redeployment, alternative duties or placement on another watch or team. All alternatives must be explored and recorded before a suspension is authorised.
- Suspension must be informed by a completed Suspension Risk Assessment, in consultation with the Professional Standards Unit, and authorised at the appropriate level.

- The employee will be informed of the decision to suspend, the reasons for suspension, any conditions that apply, and the arrangements for review.
- Managers must recognise the potential impact on wellbeing and handle decisions and communication sensitively. Appropriate support should be offered.
- Where the employee is a recognised trade union representative, the LFB will, with the employee's agreement, inform the relevant senior full-time official before any suspension is put in place. As set out in 9.1.
- Employees will normally remain on full pay during suspension. Where an employee is absent due to sickness during a period of suspension, normal sick pay provisions will apply.
- Suspension should be kept as short as possible and reviewed regularly to ensure it remains necessary and proportionate.

7.6 Stages of the Procedure

Informal stage

Minor issues should be dealt with quickly and confidentially by the line manager. A record of an informal conversation, which may be issued as a Letter 1, may be placed on the e-PRF and shared with the PSU for oversight purposes. A record of a conversation is not a formal disciplinary sanction and will not be relied upon to escalate a matter to a higher disciplinary stage.

At the informal stage, the manager should ensure that the employee is clear about the expected improvement and how this will be achieved.

At each formal stage, appropriate fact finding or investigation will be completed before any hearing takes place, in accordance with Appendix A.

Stage One

First instances of misconduct where formal action is appropriate. The maximum sanction is a six-month written warning.

Stage Two

Repeated misconduct or more serious matters where a written warning may not be sufficient. The maximum sanction at this stage is an 18-month final written warning.

Stage Three

This stage applies where there has been a continued failure to improve following previous warnings or where the alleged conduct is sufficiently serious to warrant consideration of dismissal or an alternative sanction.

The outcome at this stage may include dismissal or, where appropriate, an alternative sanction.

7.7 Disciplinary hearings

- Where there is a case to answer, the employee will be invited to a disciplinary hearing. Written notice will be given in advance of the hearing, setting out the allegations, the stage of the procedure and the possible outcomes. The notice period will depend on the stage of the procedure and will usually be 7, 14 or 21 days.
- Employees have the right to be accompanied by a trade union representative or a workplace colleague.
- The employee will receive the evidence bundle with the hearing invitation, or as soon as reasonably practicable afterwards, and within the relevant notice period of seven, fourteen or

twenty-one days. Information may be redacted where necessary and appropriate, in line with data protection legislation (including UK GDPR and the Data Protection Act 2018).

- The employee is expected to make every reasonable effort to attend the hearing. Where an employee fails to attend without good reason, or is persistently unable to attend, after reasonable adjustments have been considered, the LFB may proceed in their absence and reach a decision based on the available evidence, including any written representations submitted by the employee or their representative.
- If the employee or their chosen companion is unavailable on the proposed hearing date, the employee may propose an alternative time that is reasonable and normally within seven working days of the original date. The time limits referred to above may be varied by mutual agreement.
- The hearing will be conducted by a Presiding Manager. An HR representative will attend Stage Two and Three hearings to provide advice on policy, procedure, employment law and best practice. The HR representative's role is advisory, and responsibility for the decision rests with the Presiding Manager.
- Hearings will normally take place in person. A hearing may take place remotely where this is appropriate, enables fair and effective participation by all parties, and is agreed by all parties. Where agreement cannot be reached, the hearing will take place in person.
- The employee will have an opportunity to respond to the allegations, ask questions and present information in support of their case.
- In the course of a disciplinary process, an employee might raise a grievance that is related to the case. If this happens, the presiding manager should consider suspending the disciplinary procedure for a short period while the grievance is dealt with. Depending on the nature of the grievance, the manager may need to consider bringing in another manager to deal with the disciplinary process.
- The decision on whether to suspend the disciplinary procedure should be done in consultation with the PSU.
- The Presiding Manager may adjourn the hearing if further investigation or clarification is required.
- The decision will normally be confirmed in writing within seven working days of the conclusion of the hearing and will include the right of appeal, where a formal sanction is imposed. [Here](#).

7.8 Decisions and sanctions

Following a formal disciplinary hearing, the Presiding Manager will decide whether the allegation is upheld. If the allegation is not upheld, no disciplinary sanction will be imposed.

Where it is upheld, the Presiding Manager will decide the appropriate outcome considering the stage of the procedure and any mitigation presented.

Possible outcomes are:

- No formal action
- 6 months written warning.
- 18 months final written warning
- Dismissal with notice for serious or repeated misconduct where summary dismissal is not justified.
- Summary dismissal (dismissal without notice) where gross misconduct is found.
- Alternative sanctions for uniformed operational staff in accordance with the Grey Book, including demotion (no more than one grade; demotion of more than one grade requires the agreement of the employee), disciplinary transfer or loss of pay of up to thirteen days.

Any sanction imposed will be proportionate in all the circumstances of the case.

Effective date of sanctions

- Formal sanctions will normally take effect from the date the outcome letter is issued. Where an employee is summarily dismissed, the dismissal will take effect immediately.
- In exceptional cases, the Presiding Manager may decide, with HR Representative advice, that a sanction awarding a warning should be backdated. The rationale must be clearly recorded.

7.9 Appeals

- Employees have the right to appeal against any formal disciplinary sanction
- The grounds of appeal must be one or more of the following:
 - a defect in procedure such that the hearing was unfair
 - the allegation is not proven on the balance of probabilities
 - the disciplinary sanction was too severe
 - new evidence has come to light since the disciplinary hearing which will have an impact on the decision
- Appeals must be submitted to the PSU in writing within seven working days of receiving the outcome letter and must state the grounds of appeal. Where insufficient detail of the grounds of appeal is provided, the employee will be asked to clarify the grounds before the appeal proceeds.
- Appeals will be heard without unreasonable delay by a manager who has not previously been involved in the case and who is normally more senior to the Presiding Manager.
- The Appeal Manager will conduct the appeal hearing as a rehearing, in full or in part, **where this is required**. Otherwise, the appeal hearing will be conducted as a review.

A rehearing would be required in the following instances (this is not necessarily an exhaustive list):

- There was a procedural defect at the original hearing such that the hearing was unfair.
- New evidence has come to light which needs to be heard in full.
- There is a dispute about evidence given by one or more witnesses at the original hearing. In these cases, it may be necessary to rehear the witness evidence at the appeal

Where an appeal is conducted as a review, the Appeal Manager will consider the documentation from the original hearing together with the submissions made at the appeal hearing.

- The Appeal Manager will determine whether the appeal is conducted as a rehearing or as a review and will provide the rationale.
- If the employee appeals against dismissal, the dismissal will take effect as confirmed and will not be delayed pending the outcome of the appeal. If the appeal is upheld, the employee will normally be reinstated with no loss of continuity of service or pay.
- In considering the appeal, the Appeal Manager will assess whether the procedure followed was fair, whether the decision was reasonable, and whether any new information has become available.
- The appeal may confirm or revoke the original decision or substitute a lower sanction.
- The outcome will be confirmed to the employee in writing.
- The appeal decision is the final stage of the LFB's internal disciplinary process.

Further information is set out in the Disciplinary Procedure Guidance. [here](#).

8 Grievances during Disciplinary Process

- 8.1 In the course of a disciplinary process, an employee might raise a grievance that is related to the case. If this happens, the manager should consider suspending the disciplinary procedure for a short period while the grievance is dealt with. Depending on the nature of the grievance, the manager may need to consider bringing in another manager to deal with the disciplinary process. Employees should refer to the Grievance Policy (PN 394) for the full process.
- 8.2 Grievances raised during a disciplinary process
If an employee raises a grievance during a disciplinary investigation or hearing, the LFB will consider how the grievance should be managed and whether it affects the fairness or continuation of the disciplinary procedure.
- 8.3 Where a grievance is raised during the investigation stage, the Head of PSU, or their designated deputy, will decide whether the grievance:
- should be addressed as part of the disciplinary investigation so far as it is relevant to the matters under consideration, or
 - should be managed separately under the Grievance Policy, and whether a pause to the disciplinary process is required.
 - The employee will be informed of the decision and the rationale for how their grievance will be handled.

9. Other Considerations

- 9.1 Where an employee who is subject to a disciplinary process is a trade union representative, the LFB will discuss the matter with a relevant senior full-time official, with the employee's agreement, before proceeding. This supports fairness and transparency in the process.
- 9.2 Criminal offences
- If an employee is charged with, or convicted of, a criminal offence not related to work, this will not in itself be a reason for disciplinary action. The manager should establish the facts of the case and consider whether the matter is serious enough to warrant starting the disciplinary procedure. The main consideration should be whether the offence, or alleged offence, makes the employee unsuitable for their type of work. Similarly, an employee will not be dismissed solely because they are absent from work as a result of being remanded in custody.
 - The decision on how to proceed in such cases will rest with the Head of PSU or their designated deputy.
- 9.3 Impartiality and Conflicts of Interest
- Before appointing an Investigating Officer, the Head of PSU, or their designated deputy, must be satisfied that no conflict of interest exists. The appointed Investigating Officer must declare any actual or perceived conflict of interest at the outset of the process. Any conflict must be declared and resolved before the investigation begins.

- Where a potential conflict of interest arises, the Head of PSU, or their designated deputy will decide whether there is a conflict of interest, and whether the investigation should be reallocated. Where the potential conflict relates to the Head of PSU, any determination will be made by the Director for People.

9.4 False or Malicious Allegations

- Employees are encouraged to raise concerns in good faith. No employee will face disciplinary action solely because an allegation is not upheld or because there is insufficient evidence to substantiate it.
- However, where there is clear evidence that an allegation has been deliberately fabricated or made maliciously, this may itself amount to misconduct.
- In such cases, a separate and proportionate investigation will be carried out before any decision is made, and disciplinary action may be taken where appropriate, having regard to the seriousness of the conduct.

10. Confidentiality and Records

10.1 Confidentiality

- Information relating to a disciplinary process must be treated as confidential.
- It will only be shared with those who have a legitimate need to know and in a manner that is proportionate to the circumstances.
- Employees, witnesses and managers involved in a disciplinary process must not disclose case details except where authorised or required by law.
- Unauthorised disclosure of confidential information may itself constitute misconduct under this policy. [Link here](#).

10.2. Records

- Records relating to disciplinary proceedings, including warnings and hearing notes, will be retained securely in accordance with the LFB's Data Protection and Privacy Policy and Records Retention Strategy.
- Once a warning has expired, it should not be relied upon when determining future disciplinary outcomes.
- Records will be handled in accordance with applicable data protection legislation, including the General Data Protection legislation and the Freedom of Information Act.

11. Help & Support

The LFB recognises that disciplinary processes can be stressful. Employees may seek support at any stage, and managers should signpost appropriate services where needed.

With the employee's consent, the PSU may refer individuals to the Counselling and Trauma Team where additional support is appropriate.

- HR Helpdesk – extension 89100 option 3, or email IT.HR@london-fire.gov.uk
- Payroll – payforms@london-fire.gov.uk
- Counselling and Trauma Team counselling@london-fire.gov.uk

- Communications Team – for accessible formats, extension 30753, or communications.team@london-fire.gov.uk

This policy may also be available on request in other accessible alternative formats as set out in Policy number 290 – Guidance note on translation and interpretation. Please contact Communications on extension 30753 or communications.team@london-fire.gov.uk

The LFB invites your engagement so that it can learn. If you have a suggestion to improve this policy, please submit your idea via the Staff Suggestion Scheme on Hotwire, as set out in Policy number 887 – Staff suggestion scheme. Any changes must follow the agreed engagement, consultation, negotiation, or governance requirements.

Appendix A – Role Equivalency Table

Policy Role	Uniformed Equivalent (Grey Book)	FRS grade
Line Manager	Station Officer / Station Commander	FRS D
Senior Manager	Group Manager	FRS E
Senior Leader	Area Manager / LFB Manager	FRS F-G

Appendix B – Level of Managers

	Investigation	Conduct hearing/Take action
Informal/Formal Stage One	Sub/Station Officer FRS C Control Commander	Station Commander FRS D Control Commander
Second Formal Stage	Station Commander FRS D Control Commander	Group Commander FRS E Senior Control Commander
Third Formal Stage	Group Commander FRS E Senior Control Commander	Deputy Assistant Commissioner FRS G Deputy Assistant Commissioner

Appendix C – Simplified Disciplinary Flow tables

Informal Resolution	Minor issues resolved locally - Informal action will normally be recorded by way of a written note of the discussion, issued as a Letter 1 and retained on e-PRF
First Formal Stage	Written warning
Second Formal Stage	Final written warning
Third Formal Stage	Dismissal or alternative sanction

Document history

Assessments

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

EIA	XXXX	SDIA	XXXX	HSWIA	XXXX	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

Subject list

You can find this policy under the following subjects.

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Freedom of Information Act exemptions

This policy/procedure has been securely marked due to:

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



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.



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Equality Impact Assessment (EIA) Initial Screening Form

A. Name, status and expected outcomes of the activity



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Equality Impact Assessment (EIA) Initial Screening Form

Disciplinary Policy 392

This policy provides details on:

1. Sets out LFB disciplinary process managing conduct fairly and consistently
2. Define stages, decision making standards and safeguarding when conduct matters are being investigated
3. Explains employees' rights, management responsibilities and available support through the discipline process.

This EIA screening form has reviewed Policy 392 against all protected characteristics under the Equality Act 2010, as well as relevant non-protected characteristics such as socio-economic status. No adverse or disproportionate impacts have been identified. The policy is procedural in nature and applies consistently across all staff groups, with built-in flexibility to support individual needs.

A range of mitigations are in place to ensure equitable access to the disciplinary process and to prevent unintended disadvantage. These include the availability of reasonable adjustments, accessible and alternative communication formats (as set out in Policy 290), flexible or remote attendance arrangements, and consideration of individual health, wellbeing, pregnancy or maternity-related circumstances, religious observance, and socio-economic factors prior to any progression to formal action.

The policy promotes fairness and proportionality through evidence-based decision-making, early management intervention, and consistent application of LFB values. Additional safeguards include bias-awareness training for managers and investigators, conflict-of-interest declarations to support impartiality, monitoring of case outcomes to identify any potential disproportionality, and access to specialist EDI advice for complex or intersectional cases. Sensitive and respectful handling of confidential information, including the consistent use of affirmed names and pronouns for trans staff, further supports dignity and inclusion.

Taken together, these measures ensure that staff with different protected characteristics can participate fully and fairly in the processes governed by Policy 392. The policy provides a clear and coherent framework that supports equal treatment, mitigates the risk of discrimination, and upholds the LFB's legal and organisational commitments to equality, diversity and inclusion.



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Equality Impact Assessment (EIA) Initial Screening Form

B. Who is this activity for, who is impacted by it? <i>(all LFB staff, specific department, external communities)</i>
This policy applies to all LFB staff
C. Reason for Equality Impact Assessment



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Equality Impact Assessment (EIA) Initial Screening Form

Having due regard to Public Sector Equality Duty (PSED), this EIA is being performed to assess the effect Policy 392 and supporting material has on LFB's workforce.

Policy 392 define processes and procedures which directly support the legislative requirements of ACAS Code of Practice, Grey book and CIPD guidance.

The purpose of policy 392 is defined within the policy under the following paragraphs:

Section 1 to 3.

1.1. *"This policy sets out the LFB's Disciplinary Procedure, which applies to all employees, both uniformed and non-uniformed."*

1.2 *"The disciplinary procedure is a formal process for addressing concerns about an employee's conduct. Its purpose is to provide a clear, fair and consistent framework that supports employees to meet required standards, promotes improvement and learning, and resolves issues constructively. Issues relating to performance are managed under separate procedures"*

3.1 *This procedure applies to misconduct and gross misconduct, including attendance-related misconduct such as persistent lateness or unauthorised absence*

Policy 392 and its supporting documents provide information on Discipline procedure. Other policies and documents considered.

[Public Sector Equality Duty](#)

[Equality Act 2010](#)

Your London Fire Brigade – [Our plan for 2023-2029](#) (CRMP)

LFB [Values](#)

People Services Strategy

Grey Book

[LFB Equity Policy](#)

[Protected characteristics resource library](#)

Policy No. 370 [Policies and procedures guidance](#)

Policy No.290 [Translation and interpretation](#)

[Inclusive and accessible documents for neurodivergent individuals – tips and resources 2024](#)



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Equality Impact Assessment (EIA) Initial Screening Form

[The LFB key EDI terminology](#)

HRE36 [Meeting the religious, spiritual and pastoral care needs of staff](#)

[Role to rank collective agreement 2019](#)

Policy No. 1005 [Supporting health and wellbeing](#)

Policy No. 323 [Trans inclusion policy](#)

Policy No. 555 [Family support leave \(including maternity\) policy](#)

Policy No. 313 [Maternity provisions – breast feeding policy](#)

Policy No. 969 [Menopause policy](#)

Policy No. 448 [Working with choice – flexible working options policy](#)

Policy No. 538 [Annual leave and public holiday leave allocation policy – operational staff](#)

Policy No. 651 [Station allocation and transfer policy](#)

Policy No. 788 [Electronic Personal Record File \(E-prf\) policy](#)

Policy No. 327 [Guidance for senior managers in relation to mobilising and rota management](#)

Policy No. 538 - [station based establishment and skills requirements](#)

[Role to rank collective agreement 2019](#)

Policy No. 512 – [Special leave policy](#)

Policy No. 888 – [Partial attendance policy](#)

Policy No. 1008 – [Trade union time off and facilities policy](#)

Policy No. 965 – [Equality support groups](#)

Policy No. 251 – [Station Working Routines](#)

It is recognised that when performing its regulatory role, LFB will regularly deal with persons outside of the LFB workforce. The PSED applies equally to LFB's external activities, such as our dealings with members of the public, third parties and external agencies. As such, due consideration has been given to the PSED in respect of our external activities when devising this policy.

The policy 392 is being reviewed to improve its understanding, make the policy more inclusive and streamline it in line with our LFB values and organisation developments, transformations requirements



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Equality Impact Assessment (EIA) Initial Screening Form

D. Team responsible for the activity <i>(Please provide two different names for resilience)</i>	
EIA Author(s): Name: Carolina Willimas Job title: PSU Senior Investigator Department: People Services	EIA Owner(s): Name: George Fisher Job title: Head of Professional Standards Department: People Services

Equality Impact Assessment (EIA) Initial Screening Form

E. Equality and diversity considerations					
Protected Characteristic	Positive Impact ✓	Negative Impact ✓	Summary of impact	Is a mitigating action required?	
				Yes	No
Age	☒	☐	It is considered that the provisions of Policy 392 do not negatively or disproportionately impact staff across different age groups. The disciplinary procedure applies consistently to all employees and provides accessible processes, including clear communication, support options, and the right to representation, regardless of age. It is recognised that age-related factors may influence how staff engage with formal procedures. For example, some employees may have differing levels of familiarity with digital platforms, may require additional time to review documentation, or may experience age-related health considerations that affect attendance or participation in meetings. Equally, younger staff may have less experience of formal processes and may require additional clarity or supportive guidance. Reasonable adjustments can be made at all stages of the disciplinary process to accommodate these needs, including provision of alternative formats, additional explanation, flexible scheduling, remote or hybrid attendance options, or extended time for preparation. Training for managers and investigators will be provided in line with LFB policy and inclusion standards to ensure fair, proportionate and consistent application across all age groups. Managers are expected to consider any relevant age-related factors when arranging meetings or progressing cases, and to ensure that all staff are supported to participate fully in the process.	☐	☒

Equality Impact Assessment (EIA) Initial Screening Form

			No adverse impact has been identified. Policy 392 is procedural in nature and applies equally across all age groups. The combination of accessible communication, reasonable adjustments, and trained decision-makers mitigates the risk of unintended disadvantage related to age.		
Disability	☒	☐	LFB has a duty under the Equality Act 2010 to make reasonable adjustments for staff with disabilities, including those with neurodivergent conditions, mental health conditions, sensory impairments, or other impairments that meet the Act's definition. The provision of reasonable adjustments ensures that individuals are not treated less favourably or placed at a substantial disadvantage because of disability. It is recognised that disability-related behaviours, neurodivergence, and mental health conditions may influence communication styles, behaviour, or engagement in workplace processes, including conduct procedures. This policy is designed to mitigate potential disadvantage by ensuring that reasonable adjustments are considered and implemented at all stages, including through the provision of accessible communication formats, adjusted meeting arrangements, flexible timescales where appropriate, and supportive management approaches to enable meaningful participation. To ensure materials are fully accessible to individual need, this policy and its supporting documentation have been developed with consideration of relevant inclusion guidance and internal policies, including the LFB <i>Accessible Communication Guide</i> and LFB Policy Note 0553, <i>Learning Support Policy</i>. Where required, alternative formats or communication methods will be provided to ensure staff can effectively access and engage with this policy. The policy considers the adjustments that must be made to support individuals with	☐	☒



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Equality Impact Assessment (EIA) Initial Screening Form

			physical disabilities as well as those experiencing neurodivergent, mental health, sensory, or cognitive conditions which meet the Equality Act definition of impairment. The implementation of workplace adjustments supports equality of opportunity and prevents discrimination, ensuring that all staff, regardless of protected characteristics, can participate effectively in the procedures to which this policy applies and maintain constructive working relationships. No adverse impact has been identified. Policy 392 is procedural in nature and does not impose physical requirements. Reasonable adjustments, including adjustments to meeting formats, timescales, communication methods, or venues, can be made to support participation where required, in line with organisational duties. LFB Disability Data for Staff 31 October 2025 is as follows: Total number of staff making up workforce = 5877 5036 (85.69%) Identify as not disabled, 539 (9.17%) Disabled 58 (0.99%) Prefer not to say and 244 (4.15%) don't provide Information.		
Gender Reassignment	☒	☐	LFB does not currently collect EDI workforce data specifically in relation to gender reassignment. However, for the purpose of this Equality Impact Assessment, it is acknowledged that there are staff across the workforce who are undergoing or have completed a process of gender transition. Due regard has been given to LFB Policy Note 323 <i>Trans Inclusion Policy</i> when formulating the provisions of Policy 392 and its supporting documents. The application of Policy 392 is designed to operate fairly and consistently for all staff and is underpinned by the LFB's values of equity, dignity, and respect. The policy seeks to	☐	☒

Equality Impact Assessment (EIA) Initial Screening Form

			mitigate risks of disadvantage for trans staff by ensuring that all conduct processes are carried out sensitively, confidentially, and without discrimination. In disciplinary, investigatory, or hearing processes, managers and panel members are required to use an individual's affirmed name and pronouns consistently and respectfully. Any personal or sensitive information relating to gender identity or transition status is handled in strict confidence and shared only where necessary and appropriate for procedural purposes, in line with data protection and confidentiality requirements. Managers and investigators receive training and guidance to support inclusive practice and the use of respectful language, ensuring that communication during formal processes is professional, appropriate, and supportive. Where transition-related absence, health impacts, or wellbeing considerations may be relevant, these factors are considered sensitively and fairly prior to any escalation to formal disciplinary action, in line with reasonable adjustment duties and LFB inclusion guidance. No adverse impact has been identified. Policy 392 is procedural in nature and does not impose any requirements that would disproportionately affect staff with this protected characteristic. The combination of confidentiality safeguards, inclusive communication practice, management training, and reference to the Trans Inclusion Policy mitigates the risk of disadvantage and supports fair, dignified treatment for trans staff.		
Marriage / Civil Partnership	☒	☐	LFB does not currently record EDI staff data for marriage and civil partnerships but for the purposes of this EIA it has been acknowledged that across all staffing groups, there are staff within the workforce who are either married or are in a civil partnership. It is considered that the policy 392 does not negatively disproportionately impact staff with this protected characteristic.	☐	☒

Equality Impact Assessment (EIA) Initial Screening Form

			LFB measures: - Use independent managers for cases involving couples. - Keep clear records to show decisions are fair.		
Pregnancy / Maternity	☒	☐	LFB does not currently collect EDI workforce data specifically in relation to pregnancy or maternity. However, for the purpose of this Equality Impact Assessment, it is acknowledged that there will be staff within the workforce who are pregnant, on maternity leave, or returning from maternity leave. Policy 392 relates solely to conduct management and procedural requirements. Engagement with the policy typically involves administrative activities such as reading guidance, attending meetings, or participating in investigations or hearings. These activities can be arranged flexibly to accommodate the needs of employees who are pregnant, on maternity leave, or who have recently returned from maternity leave. It is recognised that pregnancy-related health conditions, fatigue, sickness, caring responsibilities, pregnancy-related absence, or lateness may impact an individual's attendance, behaviour, or ability to participate in workplace processes. The policy framework requires that any such health-related or pregnancy-related factors are considered appropriately and sensitively before any progression to formal disciplinary action. Managers are expected to explore relevant contextual factors, consider reasonable adjustments, and seek supportive solutions prior to escalation, ensuring that pregnancy or maternity-related circumstances are not incorrectly treated as misconduct. Reasonable adjustments may include, but are not limited to, flexible scheduling, remote attendance, alternative locations, adjusted timings, or temporary modifications to	☐	☒

Equality Impact Assessment (EIA) Initial Screening Form

			participation requirements to enable full and fair engagement without detriment. Due regard has been given to LFB Policy Notes PN 555 <i>Family Support Leave (including Maternity)</i> and PN 313 <i>Maternity Provisions</i>, which provide for workplace adjustments for expectant mothers and staff on maternity leave. Managers are required to undertake risk assessments in line with LFB Policy 673 and the <i>Pregnancy – Possible Risks Guide</i>. These measures support adjustments such as additional rest breaks, reduction of physical activities, or adaptation of working arrangements to ensure that staff within this protected group are fully supported in both operational duties and procedural engagement. Due consideration has also been given to LFB Health and Safety Policy PN 597, which places responsibility on managers to assess and mitigate risks to employee wellbeing. This further supports individualised arrangements that promote safe and equitable participation in disciplinary processes where required. No adverse impact has been identified. The procedural nature of Policy 392, combined with the availability of flexible arrangements, reasonable adjustments, health and safety risk assessments, and supportive management processes, mitigates the risk of disproportionate impact on staff who are pregnant or on maternity leave and supports equitable access to the policy.		
Race	☒	☐	Due regard has been given to LFB Policy Note PN 973 <i>LFB Equity Policy</i> and the LFB <i>Inclusion Strategy</i> when formulating the provisions of Policy 392 and its supporting materials. The policy is underpinned by the LFB's organisational values, including equity, integrity, teamwork, and learning, and by the requirement for disciplinary processes to be conducted fairly, consistently, and with respect for all involved.	☐	☒

Equality Impact Assessment (EIA) Initial Screening Form

			As a public body serving London's diverse communities, the LFB is required to act impartially and maintain public confidence. These principles are reflected within the policy, which applies equally to all employees and sets clear expectations that personal beliefs must not influence professional conduct or decision-making. The policy's zero tolerance stance towards discrimination, bullying, harassment, and victimisation further supports the protection of staff from race-based inappropriate behaviour and biased treatment. The policy seeks to limit the potential for bias-motivated or discriminatory complaints or outcomes through its emphasis on evidence-based investigation, consistency of process, and proportionate decision-making. Investigators are expected, where appropriate, to explore relevant contextual factors, including possible discriminatory motive, to ensure that conduct concerns are assessed objectively and without assumption. Decisions must be supported by documented evidence rather than perception or subjective judgement alone. The procedural scope of the policy ensures that misconduct and unresolved performance matters are managed within a structured, standardised framework. This reduces risk of inconsistency or differential treatment across staff groups. Outcomes are subject to monitoring and analysis, including review of disciplinary action by ethnicity, to identify potential disproportionality. Where trends or patterns are identified, these are reviewed to determine whether additional safeguards are required, such as secondary case review or the use of diverse panels, to strengthen fairness and mitigate potential bias.		
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LONDON FIRE BRIGADE

Equality Impact Assessment (EIA) Initial Screening Form

			LFB measures supporting this approach include: • Bias-awareness training for managers and investigators. • Evidence-based assessment and documented rationale for decisions. • Monitoring of case outcomes by ethnicity to identify any disproportionality. • Use of conflict-of-interest declarations for investigators and panel members to ensure impartiality and transparency in decision-making. No adverse impact has been identified. Policy 392 is procedural in nature and applies uniformly to all staff groups. Its framework of impartiality, zero tolerance of discrimination, and outcome monitoring supports the early identification and mitigation of any unintended disproportionate impact on racial or ethnic groups. LFB Ethnicity Workforce Data (31 October 2025) The ethnic breakdown of the workforce (5,877 staff) is as follows: • White: 4,467 (76.01%) • Underrepresented Minority Ethnic: 1,099 (18.70%) • Prefer not to say: 69 (1.17%) • Not provided: 242 (4.12%)		
Religion / Belief	☒	☐	Due regard has been given to LFB Policy Note PN 973 <i>LFB Equity Policy</i> and the LFB <i>Inclusion Strategy</i> when formulating the provisions of Policy 392. It is considered that the provisions of Policy 392 do not negatively or disproportionately impact staff across different religions or beliefs. The policy is underpinned by the requirement for processes to be conducted fairly, consistently, and with respect for all involved, ensuring that individual religious observance is appropriately considered in the	☐	☒

Equality Impact Assessment (EIA) Initial Screening Form

			application of disciplinary procedures. It is recognised that religious observance or belief commitments may affect availability for meetings or participation in formal processes, particularly during major religious festivals, fasting periods, or prayer times. The policy framework supports flexible and reasonable scheduling of interviews, hearings, training, and other procedural activities where required to ensure individuals are not disadvantaged because of their religion or belief. Adjustments may include changes to meeting times or formats, sensitivity to fasting periods when setting hearing schedules, or other suitable arrangements to enable meaningful participation. Where panel composition is required within the conduct process, considerations may also be given to ensuring that arrangements do not inadvertently disadvantage or exclude individuals because of religious or belief-based factors, including sensitivity to gender-specific cultural requirements where appropriate. In addition, conflict-of-interest declarations for investigators and panel members support impartiality and transparency, further reducing the risk of conscious or unconscious bias influencing outcomes. LFB inclusion policies reinforce the right of staff to practise their religion or belief without restriction or detriment. Where regulatory activities or training schedules potentially conflict with religious observance, reasonable adjustments can be made to support staff participation and ensure that individuals within this protected group are not placed at a disadvantage.		
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Equality Impact Assessment (EIA) Initial Screening Form

			No adverse impact has been identified. Policy 392 is procedural in nature and applies equally to all staff groups. Its flexibility in scheduling and approach to reasonable adjustments supports equitable access to the policy and mitigates the risk of unintended disadvantage related to religion or belief.		
Sex	☒	☐	Due regard has been given to LFB Policy Note PN 973 <i>LFB Equity Policy</i> and the LFB <i>Inclusion Strategy</i> when formulating the provisions of Policy 392. Policy 392 applies equally to all staff regardless of sex. It does not impose requirements relating to dress or uniform, nor does it prescribe attire for disciplinary meetings or hearings. Any expectation to attend meetings in smart or corporate attire reflects general workplace custom rather than specific policy requirements and applies equally across all genders. Formal dress and PPE standards are governed separately under FSIGN 109 and relevant organisational regulations. As such, this policy does not create any direct or indirect sex-related impact in respect of dress. Due regard has also been given to Policy Note 969 <i>Menopause Policy</i>. It is recognised that sex-related health factors, including menopause, menstrual health conditions and associated symptoms, may affect behaviour, attendance, communication or participation in workplace processes. To mitigate the risk of disadvantage, the policy framework supports early management intervention, consideration of reasonable adjustments and exploration of any health-related factors that may be relevant before progressing to formal disciplinary action. Managers are supported through training and guidance to ensure consistent, proportionate decision-making and to help identify where health-related impacts may be	☐	☒

Equality Impact Assessment (EIA) Initial Screening Form

			influencing conduct or engagement. This promotes fairness and ensures that disciplinary processes are not applied without appropriate assessment of underlying factors. The policy also allows for flexibility in scheduling meetings or hearings where symptoms or treatment may affect participation, and accessible communication formats can be provided where needed to support meaningful engagement. No adverse impact has been identified. The procedural nature of Policy 392, combined with the availability of supportive management guidance and reasonable adjustments, mitigates the risk of disproportionate impact on staff on the basis of sex and supports equity of opportunity across all gender groups. LFB Sex Data for staff @ 30 September 2025 is as follows: The sex breakdown of 5877 staff is 1107 (18.84%) females and 4770 (81.16%) males as a total across all staffing groups.		
Sexual Orientation	☒	☐	Due regard has been given to LFB Policy Note PN 973 "LFB Equity Policy" and the LFB "Inclusion Strategy" when formulating the provisions of policy 392. It is considered that policy 392 provisions do not negatively disproportionately impact staff across different sexual orientations. LFB sexual orientation Data for staff 31 October 2025 is as follows: Total number of staff making up workforce = 5877 Heterosexual 4250 (72.32%), LGB 369 (6.28%), 165 (2.81%) preferred not to say and 1093 (18.60%) have not provided information.	☐	☒



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Equality Impact Assessment (EIA) Initial Screening Form

Socio Economic*	☒	☐	LFB does not currently collect EDI workforce data relating to socio-economic background. However, for the purposes of this Equality Impact Assessment it is recognised that employees across the workforce may experience differing financial, housing, caring, or travel circumstances which could affect their ability to fully participate in workplace processes. Due regard has been given to LFB Policy Note PN 973 <i>LFB Equity Policy</i> and the LFB <i>Inclusion Strategy</i> when formulating the provisions of Policy 392 and its supporting materials. It is recognised that socio-economic circumstances may affect an employee's capacity to engage in disciplinary processes, for example relating to travel costs, caring responsibilities, access to technology, or other financial constraints. The policy framework mitigates potential disadvantage by providing for flexible arrangements and supportive procedural measures to enable fair participation. Where suspension is required as part of the disciplinary process, this is implemented on full pay, in line with organisational policy, to prevent financial detriment during investigatory stages and to ensure individuals are not disadvantaged due to loss of income. Additionally, procedural arrangements may include consideration of travel location, remote or hybrid attendance options, reasonable scheduling flexibility, or other adjustments to reduce any participation barriers related to personal or financial circumstances. Managers and investigators are expected to consider relevant personal circumstances when arranging meetings or hearings and to apply the policy proportionately to ensure staff are supported to engage fully and fairly in the process.	☐	☒
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Equality Impact Assessment (EIA) Initial Screening Form

			No adverse impact has been identified. Policy 392 is procedural in nature and applies equally across all staff groups. The ability to provide full pay during suspension and flexible or remote participation arrangements mitigates the risk of disproportionate impact linked to socio-economic circumstances.		
Caring responsibilities*	☒	☐	The LFB does not currently record EDI staff data for caring responsibilities, but for this EIA it has been considered across all staffing groups in the workforce. Due regard has been given to LFB Policy Note PN 448 “Working with Choice” when formulating the provisions of policy 392 and its supporting material. It is considered that the policy 392 provisions have no restrictions on staff with caring responsibilities.	☐	☒
Multiple Protected Characteristics (Cumulative Impact)	x		It is recognised that some employees may hold multiple protected characteristics, and that the combined or intersecting effects of these characteristics may result in more complex experiences or increased risk of disadvantage within workplace processes. Policy 392 is applied through a framework of individual assessment, reasonable adjustments, and evidence-based decision-making, enabling managers and investigators to consider the full personal context of each case rather than assessing characteristics in isolation. This approach supports fair treatment for staff where intersecting factors such as disability and race, religion and sex, or gender reassignment and socio-economic circumstances may collectively impact behaviour, wellbeing, communication, or participation. Where cases present complexity or heightened equality considerations, managers and		

Equality Impact Assessment (EIA) Initial Screening Form

			investigators are able to seek specialist advice from internal Equality, Diversity, and Inclusion (EDI) professionals to ensure that decisions are lawful, proportionate, informed, and sensitive to the intersecting needs of affected individuals. This safeguard supports consistent and equitable application of the policy and reduces the risk of cumulative disadvantage. No adverse intersectional impact has been identified. The availability of individualised adjustments supported management decision-making, and access to EDI advice ensures that staff with multiple protected characteristics can participate fairly and effectively in the processes governed by Policy 392.		
Accessibility and Reasonable Adjustments	x		LFB recognise the importance of ensuring that Policy 392 and its supporting documentation are fully accessible to all staff, including those with disabilities, neurodivergent conditions, sensory impairments, health conditions, language or literacy needs, pregnancy-related health impacts, caring responsibilities, or socio-economic barriers. The policy and guidance documents can be provided in alternative and accessible formats where required, including large print, easy-read, audio, or digital formats suitable for assistive technology. Staff are clearly signposted to how they can request reasonable adjustments or alternative formats through their line manager, HR, Occupational Health, or the specialist support teams, in line with the LFB <i>Accessible Communication Guide</i> and relevant inclusion policies. Where formal disciplinary procedures apply, reasonable adjustments are considered at all stages to ensure meaningful participation. This may include accessible communication formats, additional time to review documentation, flexible scheduling, remote or hybrid		

Equality Impact Assessment (EIA) Initial Screening Form

			attendance options, or support arrangements tailored to individual needs. Staff are also encouraged to engage with the policy review and improvement process through the Staff Suggestion Scheme (Policy 887), ensuring that accessibility considerations continue to be identified and addressed. No adverse impact has been identified. The availability of accessible materials, proactive signposting of adjustment requests, and the procedural flexibility built into Policy 392 mitigate the risk of disadvantage and promote equitable access for all staff groups.		
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Explain why a full EIA is not required:

A full EIA may not be required because the proposed amendments do not materially alter the purpose, scope or operation of PN392. The policy remains procedural in nature and applies consistently across all staff groups. An EIA was completed in 2024, and this screening has identified no new or disproportionate impacts arising from the revisions. Existing mitigations, including reasonable adjustments, accessible formats, flexible participation arrangements and guidance for managers, remain in place and continue to provide adequate protection for staff with protected characteristics.

Given the high profile of this policy, I am open to advice from the EDI Team should they determine that a full EIA would provide additional assurance or benefit.

Signed by the Submitter

Name: Carolina Williams

Rank/Grade: F



LONDON FIRE BRIGADE

Equality Impact Assessment (EIA) Initial Screening Form

Date: 10 12 2025

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 required



LONDON FIRE BRIGADE

Equality Impact Assessment (EIA) Initial Screening Form

Name: Tanya Wijesinghe

Date: 12/12/2025

Reviewed by:

Name: Ehis Ilozobhie

Date: 12/12/2025

Name: Deborah Alleyne

Date: 12/12/2025

Post Sign Off Amendments

Part 1: Project/Policy description

Name or Title of Policy/Project and Reference Number (if available):
<i>Please attach the policy documents to the HSWIA</i> People Services policy - Disciplinary Procedure
Purpose of Policy/Project:
<i>Provide a brief description</i> The disciplinary procedure is a formal process for addressing concerns about an employee's conduct. Its purpose is to provide a clear, fair and consistent framework that supports employees to meet required standards, promotes improvement and learning, and resolves issues constructively. Issues relating to performance are managed under separate procedures

Part 2: Risk assessment

Have Health and Safety risks associated with your project/policy been considered?	Yes	No
<i>(Health and safety risks associated with the release of a new policy or project must be considered at an early stage of the project or policy development and might be subject to consultation. Consider early staff-side involvement)</i>	☒	☐
Have you identified significant hazards and or health and safety risks?	Yes	No
<i>(A risk assessment is required if the policy or project has hazards that introduce significant risks of injury or ill health to employees and/non LFB employees that require risk reduction measures)</i>	☐	☒
1. If <u>significant H&S risks were identified</u>: - Record the findings of the risk assessment using the appropriate LFB risk assessment form and following the guidance provided in PN673 Risk assessment procedure. - Submit the HSWIA and risk assessment to Health and Safety for review and consultation with staff side at BJCHSW. 2. If <u>no significant risks were identified</u> during the risk assessment process, it is not necessary to record the finding of the risk assessment. Please submit the HSWIA to Health and Safety for review.		
Comments: Click here to enter text.		

Part 3: Consultation with employees on health and safety

Health and Safety consultation requirements		
(Consultation at BJCHSW is required if you answer YES to one of the following question or if significant health and safety risks were identified – see part 2)		
	Yes	No
• Are you identifying or assessing hazards or risks that may harm people?	☐	☒
• Are you making a decision on how to control risks that may cause harm?	☐	☒
• Are you making decisions about the adequacy of facilities for employees welfare?	☐	☒
• Are you making decision about procedures/policies to:		
- Consult with employees on health and safety matters?	☐	☒
- Resolve health and safety issues?	☐	☒
- Monitor employees' health and workplace conditions?	☐	☒
- Provide health, safety and welfare information and training?	☐	☒
• Are you making a decisions about the arrangements for getting competent health and safety advice?	☐	☒
• Are you determining the membership of any health and safety committee?	☐	☒
• Are you proposing a change to:		
- The physical structure of the workplace?	☐	☒
- Plant, equipment and substances used in the workplace?	☐	☒
- The work performed at the workplace that may affect the health and safety of employees?	☐	☒
Is consultation at BJCHSW required? (Consultation with staff side at BJCHSW is required if you have answered YES to any of the above questions)	Yes	No
	☐	☒
Please submit the HSWIA and associated documents to Health and Safety for review.		
Comments:		
No further comments – Daniel Wilkinson – IR & Organisational Effectiveness Officer		

Part 4: Health and Safety review

For completion by the Health and Safety Services Department		
Is a risk assessment required?	Yes	No
	☐	☒
Is consultation at BJCHSW required?	Yes	No
	☐	☒
Comments	Click here to enter text.	
Reviewed by:	Date	
Kate Doyle	03/02/2026	

Sustainable Development Impact Assessment Checklist

Project Name/ Policy Name & No This is a new reviewed policy that merges the existing PN0392a and PN0392b.

People Services Policy – Discipline Procedure

Contact Person: Daniel Wilkinson– (IR & Organisational Effectiveness Officer)

Date completed: 03/02/2026

Please send through the completed checklist with a copy of the project PID or the draft policy to environment@london-fire.gov.uk. For existing policies undergoing minor amendments, please send through a marked up copy of the policy, with the original SDIA.

Other impact assessments completed				Yes	No
1. Has an Equalities Impact Assessment been completed?				☒	☐
2. Has a Health, Safety and Wellbeing assessment been completed?				☒	☐
Environmental Impacts					
3. Will this consume any of the following (please tick those that apply and state how and if this would increase or decrease our consumption):					
Gas	☐	Electricity	☐	Water	☐
Petrol or diesel	☐	Hazardous chemicals	☐	Other natural resources e.g. timber	☐
Comments					
<i>This HR Policy does not consume any of the above resources.</i>					
4. Will this produce or reduce our production of (please tick those that apply and describe what and how):					
Non-hazardous waste	☐	Hazardous waste (see PN 862)	☐	pollutants to air, land or water?	☐
Comments:					
<i>This HR policy does not produce any hazardous waste or pollutants.</i>					
5. Will this impact (positively or negatively):				Yes	No
a. Operational/business travel by staff				☐	☒
b. Travel/deliveries by our suppliers				☐	☒
c. Environmental protection at incidents				☐	☒
d. a Site of Special Scientific Interest				☐	☒

e. Gardens or other wildlife at stations/brigade sites (e.g. nesting birds or bats)	☐	☒
Comments: <i>This HR policy does not impact aspects a) to e) above so has a positive impact.</i>		
Procurement	Yes	No
6. Will this result in the purchase of goods, services or works or influence how they are procured?	☐	☒
f. Is this for a purchase of greater than £1m?	☐	☒
g. Will this use/result in a tender for manufactured goods such as electronics, textiles, and building materials?	☐	☒
h. Will this service require low skilled/low paid employees?	☐	☒
i. Will the goods consume utilities or consumables?	☐	☒
j. Does this involve major works taking place?	☐	☒
k. If so are BREEAM and Ecological surveys required?	☐	☒
l. Will this support future cost avoidance?	☐	☒
m. Could all or part of the purchase be provided by small or local businesses?	☐	☒
n. Could this be delivered by a voluntary/community sector organisation?	☐	☒
o. Has a Request For Tender been submitted to Procurement through hotwire?	☐	☒
Comments: <i>This HR policy does not involve any procurement of goods, services or works.</i>		

For the SD Team to complete:

Policy sustainability risk rating: Low

Inputs/outputs/ impacts to address in Full SDIA: A full SDIA is not required.

Date completed: 03/02/26 EW