



NFCC Equality of access to services and actions to see us an employer of choice for Black communities.

DRAFT

Introduction

As a public service focused on excellent service to our customers, we need to ensure equality of access to our services for every person and those in temporary residence or transit through the county.

We know through our fire investigation and Operational Assurance processes that certain groups are more likely to have a fire, and they include people who are living with dementia, mobility issues, and mental health issues.

There are, however, other groups who are not necessarily showing as being at higher risk of a fire, but they may not be accessing our services, such as safe and well visits, or reporting fires because of other barriers, which may be language, perceived prejudice, and other societal factors.

Equality of access means actively seeking to engage these groups who may be unaware or choosing not to access services from us and other public sector providers.

We need to work to reduce fire risk and other life risk across all the people, and that needs different approaches. Within our equality of access approach, we also need to:

- Identify all the communities and customers that make up the FRS area
- Consider how we improve the provision of FRS services as well as access to employment opportunities within FRS to include all our communities across the range of protected characteristics - ethnicity, disability, gender, sexual orientation, religion, or belief and age
- Learn from and enhance good practice identified through equality monitoring
- Use the results of equality monitoring to mitigate any adverse impact of our services and employment processes on groups within our diverse communities
- Eliminate any unlawful discrimination identified through equality monitoring
- Promote good community relations
- Use appropriate engagement techniques, including social marketing to inform and focus on behaviours to help customers adopt safer ways of living.

Data, academic evidence, and case studies along with personal experience have informed our people impact assessments. These now need refining by contributions and insights from Black led groups e.g., charities and faith groups.

Fire Services equally need to consider how we look at our service provision.

Black Communities in the UK

Contextual background

For statistical purposes Black British people are defined as British citizens of either Indigenous African descent or of Black African-Caribbean (sometimes called "Afro-Caribbean") background and include people with mixed ancestry from either group. This also includes people of Black heritage, as some may now be third or even fourth generation.

According to the 2011 Census, the total population of England and Wales was 56.1 million, and 86.0% of the population was White.

People from Asian ethnic groups made up the second largest percentage of the population (at 7.5%), followed by Black ethnic groups (at 3.3%), Mixed/Multiple ethnic groups (at 2.2%) and Other ethnic groups (at 1.0%)

Why Fire & Rescue Services need to worry about equal access to services and employment opportunities for Black members of their communities:

Background

From the horrific murder of Stephen Lawrence in April 1993, which led to a public inquiry where Sir William Macpherson found the Metropolitan Police Service to be institutionally racist, through the immigration scandal surrounding the Windrush generation, to both the impact of Covid-19 and the Black Lives Matter campaign in 2020, the impact of race on lives in the UK has been a contentious issue.

It is widely accepted that many Black British people face daily challenges of a sort not usually experienced by White British members of their communities, and indeed infrequently by other ethnic groups in society.

This can take many forms, for instance, in the year to March 2019, 38 out of 1000 thousand Black people were stopped and searched by the Police while only 4 out of 1000 White people had the same experience. While that might be expected to be a feature of urban life, and to a large degree it is, with nearly half of all stop and search activity taking place in London, the county recording the highest percentage of Black stop and search was rural Dorset. Differences of opportunity are also apparent as the Government's 2017 Racial Disparity Audit demonstrates; headlines included:

- The unemployment rate for Black, Asian and minority ethnic people ran at 8%, whereas for White British the level was 4.6%.
- Black British pupils were excluded from school at three times the rate of White British pupils (though this was significantly less than the exclusion rate amongst Traveller groups of all heritages).
- Home ownership among Black and Bangladeshi British groups was significantly less than any other grouping, regardless of age, geography, income, and socio-economic groups.

That said, 81% of Black Britons said they "belong to Britain" – despite these challenges only 4% less than White Britons giving the same answer to the survey.

Inequality can lead to health issues as The Royal College of Psychiatrists recognise in a 2018 report:

"Racism and racial discrimination is one of many factors which can have a significant, negative impact on a person's life chances and mental health."

We are particularly concerned about the disproportionate impact on people from Black, Asian and minority ethnic communities, notably those of Black African and Caribbean heritage. Racism is pervasive and can manifest in several often-overlapping forms (including personal, cultural, structural, and institutional racism).

Like other types of discrimination, it can lead to a profound feeling of pain, harm, and humiliation among members of the target group, often leading to despair and exclusion.

In the UK, there are persistent and wide-ranging inequalities for people from Black, Asian and minority ethnic backgrounds, increasing their likelihood of being disadvantaged across all aspects of society compared to those from other backgrounds.

As the Equality and Human Rights Commission have highlighted, an individual from a Black, Asian or minority ethnic background is more likely to experience poverty, to have poorer educational outcomes, to be unemployed, and to come in contact with the criminal justice system.

These, in turn, are risk factors for developing a mental illness. These individuals are also less likely to receive the care and support when they need it.”

What then does this mean for FRS in delivering services to and encouraging Black members of our communities to see the Service as an employer of choice?

Fire and other incident risks for Black British People

Research undertaken in the Greater Manchester area between 2010 and 2015 considered ethnicity recorded against fire injuries (as opposed to fire incidents where ethnicity was not recorded), and concluded that Black or Black British people appeared to face a slightly higher risk of fire injuries than other groups – 2.1 incidents per 1000 members of the community compared to the next nearest of 1.4 per thousand for White British/Irish communities.

The heightened risk of injury for Black people in this study stemmed from cooking related fire injuries, nearly double the injury rate of the next nearest group, White British/Irish, while at the same time demonstrating that statistically they were at lower risk of smoking and alcohol related fire injuries.

Clearly the grouping defined as Black and Black British is a significant, and in itself incredibly diverse, grouping. Whilst the report appears to demonstrate that Black and Black British people are at a heightened risk of fire related injury in its statistical study it goes on to reference a number of research papers that can help refine thinking and, therefore, action plans to help target activity towards vulnerable groups.

Corcoran et al (2011), Chhetri et al (2010) and Asgary et al (2010) identified a relationship between ethnicity and fire risk, however, ethnicity itself did not appear to be a significant predictor variable. Corcoran et al (2011) also identified that when considering ethnicity in studies of fire risk, it is important to appreciate whether ‘ethnicity’ is defined in terms of ‘race’ or ‘country of origin’.

Clark et al (2014) commented upon the different levels of fire risks between different communities and areas, and discussed the socio-economic and cultural conditions and contexts such as fire-risk knowledge and practices including socio-cultural norms, routines and practices relating to smoking, cooking and candle use that could affect fire risk.

The report goes on to consider differences in risk appetite, economic position, cultural and religious observances within the large group described as Black and Black British, and the researchers found significant evidence to suggest that recently arrived migrants were in a very different (high risk) position to those whose families had lived in the UK for a number of generations (Though of course in a post Windrush age, older Black people might well feel less engaged with ‘agents of the state’ such as the FRS).

In his post Grenfell Tower research Chris Hastie, a PH student found qualitative evidence to support this view. For instance, this observation from a man of recent West African origin:

“I spent time talking to people in a diverse, disadvantaged part of the West Midlands. Among those I spoke to was Peter, a Tanzanian man. I had already established that areas with high African populations tended to have high

rates of fire. Peter had no doubt as to why this was. His community, he told me, are not used to cooking on gas and do a lot of deep frying. Information like this is of great value to those interested in improving fire safety. But it is information that will be lost to fire safety officers and local councils alike, if they don't engage with the diverse communities that they serve."

From the research highlighted in this paper and many other sources it's clear that the risk from fire incidents, whilst marginally higher in some classes for Black British people, is on a very personal level far more likely to relate to socioeconomic factors and cultural practices than ethnicity itself.

This conclusion is equally applicable to the fire and rescue service in discharging its statutory duties under the Fire & Rescue Services Act 2004 to deliver community safety, business safety advice and response services, as well as in its activities as a regulator under the Regulatory Reform (Fire Safety) Order 2004.

In terms of other incidents requiring an FRS response, road traffic collisions (RTCs) are the overwhelming type affecting every ethnic grouping.

Evidence here relating to ethnicity is very difficult to find, since RTC statistics traditionally focus on factors such as speed, weather, vehicle repair, location and driver impairment.

That said, Transport for London made the following statement in a report on road safety in the Capital: -

"BAME individuals are at higher risk of death or serious injury than non-BAME individuals across every mode except bus. The largest difference is for motorcyclists, where BAME individuals experience four times as many KSI casualties per billion kilometres as non-BAME individuals. BAME car occupants and cyclists are at approximately twice the risk of their non-BAME counterparts."

BAME of course is a very wide grouping covering all ethnic types except White British/Irish, so it would be difficult to assume that Black British individuals were at particularly high risk because of their ethnicity when road using.

However, when considering that a number of RTCs have vehicle repair issues and poor driving skills as their causal factor, it is reasonable to assume that, in the same way as for fires, some elements of the many communities making up the Black British ethnic grouping might be at higher risk on the road due to limited funds and in some cases recent arrival in the UK and unfamiliarity with UK traffic conditions.

That all said, the view that some socioeconomic and cultural groups within the broad descriptor of Black British people could be at a higher risk than the average within the UK could apply to members of any ethnic grouping who find themselves socially and financially disadvantaged, particularly when that is coupled with having newly arrived in the UK.

The English Housing Survey 2018-19 (EHS), found overcrowding is more common for renters and is more common in ethnic minority households compared to White British households, with BAME families twice as likely to be severely overcrowded. Private rented homes were also more likely to be damp, less likely to have at least one working smoke alarm and were more likely to contain hazards such as infestations and electrical dangers that pose a risk to life.

The Home Office document 'Focus on trends in fires and fire related fatalities' indicated that there are also a number of factors which could have had an upwards pressure on the numbers of fires and fire-related fatalities. For a number of these there is little data and, therefore, clear conclusions cannot be drawn. However, these factors remain risk factors to the overall downwards trend of fires and fire-related fatalities, and FRSs have commented on the risk of overcrowding in homes and fires and there has been an increase in the proportion of socially rented households which are overcrowded.

The board leading the Inquiry into the Grenfell Tower has been told *"not to ignore the impact of poverty and race on the tragedy"*.

Some 85 per cent of the 67 permanent residents of Grenfell who died in the fire were from Black, Asian and minority ethnic backgrounds. They included 32 people from the Middle East and North Africa, nine from East Africa and

seven who were White British or Irish. There were also five from West Africa, five from Bangladesh or with Bangladeshi heritage, three from the Caribbean, one from the Philippines, one resident from Colombia and one person with unidentified BAME heritage.

Employment opportunities for Black British people in the FRS

The FRS is an equal opportunities employer in the very truest sense of the statement and yet we have a very small representation of Black British people among our colleagues; so, are we seen as an employer of possibility, let alone choice by Black members of our community?

In the FRS HMICFRS inspection report, it states that 3.1% of the Service's Firefighters were drawn from BAME backgrounds.

The following statistics apply to the UK Fire & Rescue Service as a whole:

- in 2019, 95.7% of firefighters in England were White (out of those whose ethnicity was known)
- for comparison, 85.1% of working age people in England (aged 16 to 64 years) were White at the time of the 2011 Census
- from 2011 to 2019, the total number of firefighters went down from around 43,000 to around 35,000
- there was a decrease in the number of firefighters in every ethnic group except the Mixed and Asian ethnic groups
- overall, the percentage of fire and rescue service staff (including support staff) from Asian, Black, Mixed and Other backgrounds went up from 4.0% in 2011 to 5.0% in 2019

Therefore, BAME Firefighters make up 4.3% of the UKFRS.

From this, it's reasonable to surmise that the FRS needs to do more to raise its profile, initially as a potential employer and then as an employer of choice amongst all BAME members of the communities we serve.

Conclusions

The FRS need to use a range of activities and/or tools to reach the higher risk elements of the Black community with its safety messages, as well as the whole of the Black community with its employment messages.

This is very unlikely to be achieved in isolation, and links need to be made by the Service with appropriate representative groups and charities working with disadvantaged communities in different areas. Access to these groups will be achieved, in part at least, through partnership with other statutory bodies such as county councils, district councils, police, and third sector organisations.

Intelligence around language, culture and location will help drive targeted information campaigns, engagement activity and, over time, inform recruitment practices such as positive action.

It is apparent that there are significant data gaps which hinder organisations such as the FRS when it comes to understanding the needs of the communities it serves across all ethnic backgrounds, therefore, significant work needs to be done around incident and employment related ethnicity and cultural background data. Without this, as we go forward, the Services undoubtedly well-intentioned efforts will be severely hampered without the direction that informed use of data would give.

Customer segmentation across the Black communities to improve equality of access to employment and services.

Black people experiencing hate crime.

What type of incidents can be a racist or religious hate crime?

Racist or religious hate incidents can take many forms, including:

- verbal and physical abuse
- bullying
- threatening behaviour
- online abuse
- damage to property.

It can be a one-off incident or part of an ongoing campaign of harassment or intimidation. Hate incidents are not only carried out by strangers. It could be carried out by a carer, a neighbour, a teacher, or someone you consider a friend.

The majority of hate crime offences recorded by police forces in England and Wales were racial – 78,991 – which increased by 11% in the past year.

The steady rise in recent years is partly because of improvements in crime recording, but there were spikes after events such as the referendum on Britain's EU membership and terrorist attacks in 2017. Part of the increase over the last year may reflect "a real rise" in hate crimes, the Home Office said.

Actions:

Working with Police to ensure our offer is made to people who report racially motivated hate crimes.

Individuals may see Fire in the same category as Police – as an organisation that has not been demonstrative of support in the past – and so not seek support if they are experiencing domestic violence or external threats. Many will also be unaware of our services re: arson threats. Targeting campaigns through social media and specific charities and NHS services may help us increase the rate of take up of services alongside our activity to increase disclosure for records and monitoring.

We need to recognise the potential for hate crime in the workplace and ensure that messaging of intolerance of harassment and bullying is in place, training is in place, and measures to prevent harassment and hate crime are clear.

People currently employed. How we ensure fair and accessible internal HR processes, e.g., succession planning, training, promotion.

The Chartered Institute of Personnel and Development published statistics for all organisations in the UK in August 2020, stating that:

- Black people occupy 1.5% of leadership positions in the UK
- 69% of Black people surveyed feel they have less opportunity to succeed than white people
- 70% of ethnic minority workers state they have been harassed in the workplace
- Britain's BAME workers collectively earn £3.2bn less than their white counterparts every year.

These and other sources of information underline the need for actions in our workplace to provide an equal platform for success.

The Importance of Data.

We all need to undertake monitoring of our workers by ethnicity. Monitoring is a process of collecting, analysing, and evaluating information. Information can be collected in several ways, including questionnaires, surveys, consultation, and feedback. The final part of the monitoring process is to act on the findings of the data analysis in order to overcome identified inequalities. This final point is very important as to fail to act on the findings would reduce monitoring to a tick-box exercise of little value. An employer cannot claim to be

committed to Tackling Racism in the Workplace First steps – equal opportunities policy and monitoring to equality of opportunity if it does not carry out monitoring, as there is no mechanism to measure the effectiveness of equal opportunities policies and initiatives, however extensive they may be. Monitoring also makes good business sense. As part of an effective management information system, it will enable managers to manage on the basis of a realistic assessment of the organisation, rather than on gut feeling. The purpose of monitoring people's ethnic background is to: • identify possible inequalities • investigate the underlying causes of inequalities • remove any unfairness.

Actions:

On-going learning about EDI and skills development. Commitment at senior level to EDI is necessary, as it requires years to embed the culture needed to be truly inclusive.

Internal monitoring of statistics against all workforce systems – such as turnover, grievances, sickness and exit data – to search for any issues which indicate discrimination.

Ensuring barriers to internal promotion, such as confidence, are discussed and are transparent to all. Monitoring of internal succession and promotion decisions

Training which supports recognition that applicants for jobs internally and externally bring their own cultural understanding and behaviours to interviews, so careful questioning is important along with other ways to triangulate information.

Continuous dialogue and learning support for managers focused on inclusion.

Training for managers in how to manage the performance of diverse teams. There is evidence that some managers can be frightened to tackle performance issues and give feedback to BAME staff, as they are worried, they will be accused of racism. This, in turn, then leads to BAME staff finding themselves with less performance support than is needed, and it becomes a vicious circle. This is an important conversation in any FRS as to how everyone understands that performance needs to be managed and what the skills are that are needed to do it well and be inclusive.

Older Black people who have migrated into the UK and potentially still feel services are inaccessible to them.

We have no direct evidence here of this issue in Fire, but we can make a reasonable case based on the experiences and statistics detailed in this document that we need to ensure we target older Black people and ensure they are welcomed to our fire prevention services. Evidence from the following suggests this is an action area for us:

According to *BMJ* 2020; 368 doi: <https://doi.org/10.1136/bmj.m212> (Published 11 February 2020) Cite this as: *BMJ* 2020;368:m212 titled 'Neglect of older ethnic minority people in UK research and policy' – the UK has not collected any survey data specifically on older ethnic minority populations, but data from 2004, the last year when the Health Survey for England oversampled ethnic minority people (over 15 years ago), found that the proportion of people aged 61-70 reporting fair or bad health was 34% for white English people but 86% for Bangladeshi people, 69% for Pakistani people, 63% for Indian people, and 67% for Black Caribbean people. This data shows that the health of white English people aged 61-70 is equivalent to that for Caribbean people in their late 40s or early 50s, or Indian people in their early 40s.

The Societal Care Institute for Excellence reports that minority ethnic communities may have higher rates of poor health than the host community, and poorer people and those less well placed to access health and social care will be more vulnerable.

Key research findings

- The mental health needs of older people from Black and minority ethnic communities have been particularly neglected.
- There are small but significant differences in the incidence of particular health problems among different ethnic groups.
- There are lower levels of awareness of problems such as depression and dementia within Black and minority ethnic communities.

- Older people and their families from Black and minority ethnic communities have problems accessing help from services.
- There is insufficient evidence to date on whether integrated or separate services are more effective, but there is a need for more culturally appropriate and sensitive services.

<https://www.scie.org.uk/publications/guides/guide03/minority/>

Actions:

Working with specific charities and sourcing other focused third sector partners to give us access for the promotion of services. There is evidence of more religious belief and attendance at religious venues in some Black communities, so we seek to work with them to get messages across.

Seeking access to older Black people to talk to them about their experiences and how we can consider their needs in designing services and any issues during a response to incident.

Targeting safe and well campaigns for older Black people.

Training of staff is important, so we avoid the assumption that ‘older people’ are one homogenous group, so that we are sensitive to this protected characteristic. One of the discriminatory factors for many older people is that they lose identity and are labeled primarily as an older person.

Housing and its impact for fire.

In 2016 to 2018, 17% of households (3.9 million) in England lived in social housing (they rented their home from a local authority or housing association)

Black African (44%), Mixed White and Black African (41%) and Black Caribbean (40%) households were most likely to rent social housing out of all ethnic groups

Indian (7%), Chinese (10%), and White Other (11%) households had lower rates of renting social housing

Across most income bands, White British households were less likely to rent social housing than households from all other ethnic groups combined

In London, White British households were less likely to rent social housing than households from all other ethnic groups combined

- in 2017/18, 27.9% of new social housing lettings were given to vulnerable households with a priority need (counting those where ethnicity was known)
- for all ethnic groups except the Bangladeshi group, homelessness was the most common reason why vulnerable households were given priority for social housing.

Actions

Campaigns focused on encouraging Black people to seek fire prevention services if they are in social housing – we have no specific evidence, but think we need to test whether there is more reluctance to seek or a belief that our services do not apply if it is not an owned home.

We are doing separate work on homelessness.

Protection teams working with other agencies – focusing on landlords and their need to provide safe housing and, where possible, encouraging tenants to seek Home Fire safety visits, as some of our focus is on changing the fire risk behaviour of the tenants.

Attracting Black people to the FRS as a career, accompanied with need to change the image of the UK FRS away from white male into a culturally diverse mix.

- in 2019, 95.7% of firefighters in England were White (out of those whose ethnicity was known)
- for comparison, 85.1% of working age people in England (aged 16 to 64 years) were White at the time of the 2011 Census
- from 2011 to 2019, the total number of firefighters went down from around 43,000 to around 35,000
- there was a decrease in the number of firefighters in every ethnic group except the Mixed and Asian ethnic groups
- overall, the percentage of fire and rescue services staff (including support staff) from Asian, Black, Mixed and Other backgrounds went up from 4.0% in 2011 to 5.0% in 2019.

Actions

Recruitment and selection checklist

- Does the composition of the workforce reflect the local population? (Information on the local population is available from the local authority and the Census - *Every FRS should report that, and it should be monitored by the NFCC*)
- If not, is any monitoring being carried out to determine if ethnic minorities are applying for job vacancies?
- Where are job vacancies advertised? AFSA research tells us 60% of applicants come from word of mouth and we need to think how tackle this issue so there is access to all.
- Are any steps taken to ensure job advertisements are targeted at underrepresented groups?
- Is a standard application form used for all recruitment?
- Are job descriptions and selection criteria made clear to all potential applicants?
- What training is provided to staff involved in the recruitment and selection process? Does this include training on EDI and its application to recruitment?

Actions to ensure the selection process itself is fair and based on merit –

What positive action is being undertaken to attract black people to the FRS?

Examples of positive action.

The following steps can be taken as positive action which falls under section 158 of the Equality Act:

- Targeting advertising at specific disadvantaged groups, for example, advertising jobs in media outlets such as radio stations which are likely to be accessed by the target group or attending social settings which will provide access to specific disadvantaged groups
- Internships
- Reserving places for protected groups on training courses prior to interviews and shortlisting
- Support for those with protected characteristics who have failed stages of the recruitment process (as opposed to training which is part of the recruitment process)
- Establishing and supporting staff networks
- Mentoring and sponsorship programmes
- Providing opportunities for underrepresented groups to attend national events
- Secondments for those with protected characteristics
- Development courses for those with protected characteristics focused on career progression
- Graduate entry schemes.

Intersectionality: Intersectionality is a framework for conceptualising a person, group of people, or social problem as affected by a number of discriminations and disadvantages. It takes into account people's overlapping identities and experiences in order to understand the complexity of prejudices they face.

Racism Within LGBT Communities. A report from the Equality Network reported that some BAME LGBT people "are put in a position where they feel that they do not belong to either the LGBT community or the ME [minority ethnic] community and are forced to express one part of their identity at the expense of the other."

The particular needs and experiences of BAME LGBT people have historically been hidden within separate and often generalised approaches to BAME communities and LGBT communities. However, available evidence shows notable disparities between BAME LGBT people and the general LGBT.

Only 56% of BAME trans people and 76% of BAME cis LGB people had a paid job in the last 12 months, compared to 80% of white LGBT people across the UK population in areas such as employment, safety, and mental health. A few examples of such disparities are included below:

- BAME LGBT people were more likely to have experienced a negative / inappropriate incident (e.g., verbal insults, violence, coercive behaviour) inside of the home in the last 12 months.

Only 47% of BAME trans people said they had not experienced any negative or inappropriate incidents, compared to 66% of BAME cis LGB people, and 71% of white LGBT respondents. 19% of BAME LGBT people have experienced some form of unequal treatment from healthcare staff because they are LGBT, compared to 13% of LGBT people overall.

Actions:

Being conscious of intersectionality is important, and when we are directing marketing of our fire prevention services, we need to recognise different approaches for different audiences.

This also suggests seeking evidence of hate crime/arson threat with Black LGBT people.

Working with diverse business to get equality of access.

Engaging with Diverse Businesses Rapid Evidence Review 2018 states that:

- Approximately 5% of SMEs within the UK are led by an owner, partner, or director from a BME background. The proportion of BME led businesses is higher in areas such as London and the Midlands when compared to the national average
- BME-led businesses are more likely to be concentrated in specific industry sectors, such as distribution, hotels and restaurants when compared to the wider SME population
- The proportion of migrants establishing their own business is increasing, with migrants to the UK more likely to set up their own business compared to their UK born counterparts
- There are many 'push' and 'pull' factors, which can result in individuals from BME communities starting their own business. Many BME business owners started their own business to gain status in their community, to pursue an interest or to make more money. However, many commented that they faced discrimination in the workplace, which meant they were unable to gain promotion or employment proportionate to their skills and experience
- While many BME-led businesses had awareness of some regulations affecting them, many felt there were barriers which prevented them from fully complying. Their barriers include not being aware of where to access information, how to access support (or trusting support available), language and cultural barriers, and negative perception towards Local Authority officers based on previous experiences.
- Some BME-led businesses found compliance with regulations to be burdensome and potentially costly. In addition, it was felt that there is a lot of duplication as different regulatory bodies ask for the same or similar information
- While BME-led businesses often do not feel they are treated differently by inspectors to non-BME businesses, they feel that regulatory bodies should be more sensitive towards cultural factors, for example, avoiding inspections during religious holidays or festivals and being more respectful of their culture and faith
- Finally, language barriers can often be a key factor as to why a business is unable to comply with regulations. Many BME-led businesses felt that it would be helpful to have access to information in their native language, in plain English, or in a pictorial way that would be easier to understand.

Are we meeting the needs of supporting diverse businesses to comply with fire safety legislation? AFSA Working with Diverse Business conference in 2015 stated that many of these businesses were falling foul of our enforcement and prosecutions activity. Why - was it language, was it culture, were there barriers to engagement between us and the business community? This was something we needed to understand better.

Is it true now and for all services that we have a higher proportion of issues with diverse business?

Based on the findings from the evidence review, the following recommendations have been made at NFCC level, so we work together on creating a holistic approach:

- The 'engaging with diverse businesses' work stream should consider the findings of this evidence review and consider how this links in with the development of the equality and diversity toolkit

- Consider whether anything can be implemented around the following:

o Ensuring information and advice related to regulations is at least presented in plain English. However, consider whether information and advice can be presented in other ways, for example, using graphics or in other languages.

o Ensure staff members engaging with diverse businesses are aware of cultural factors which could present barriers to complying with regulations. It is also recommended that staff are provided with training, so they are sensitive of these factors and are aware of how to manage them effectively.

o Raise awareness of regulations and the impact non-compliance can have on businesses. Consider how awareness of regulations was raised in the case studies, and review whether something similar could be applied within the fire and rescue service. Also consider the power of storytelling – for example, use case studies to explain the risks of non-compliance rather than facts and figures, as business owners are more likely to relate this to their own experiences.

o Explore further working with partner organisations to ensure diverse businesses have access to the support required to comply with regulations. Also ensure that business owners are aware that good quality advice and support is available, and questions about compliance to regulations can be asked without fear of prosecution.

o Explore how regulatory bodies work with diverse businesses through local trade associations, community, and faith groups, etc., so information about regulation and compliance can be promoted through these groups. These groups are often respected and trusted among members of the BME community.

Enforcement is not always the answer. Education is key. Visiting the premises at the right times to suit the businesses. There is a need for a national fire and rescue service communication strategy for working with diverse businesses – Simple and Safe fire precautions promotion for BAME business.

FRS level Actions:

Language: The terminology used in the fire service. Jargon is not helpful and does not translate well into different languages. We all struggle to understand jargon, so must those whose English is a second or third language. Plain English is key.

Knowledge: Business Safety practitioners need much more support and education about understanding BAME attitude to fire safety and risk.

Trust: Diverse businesses may not have trust in uniformed services due to their past experiences in their home countries. Engaging with them in a more informal manner might help and using third parties to help bridge the gap with language.

The importance of using positive action in recruiting staff for business engagement roles.

Diverse businesses often have no previous fire safety knowledge and will not see it as a priority to spend money on. If you were born in the UK there is a chance you have experienced regular fire alarm tests and evacuations in school and or work. This provides a good education around fire safety and risks. Not everyone is at the same starting point, so tailoring your safety visits to those starting points is key – education and awareness is where we can make the biggest impact.

The importance of investing money in the development of education. Awareness is better spent than funding a costly prosecution. Reconsider how to fund some of the engagement work through business safety prevention activities.

- Build relationships with cultural leaders to ask them to be our advocates.
- Local research to understanding more about why business aren't always willing to comply, if that is the case.

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