



YORK AND NORTH YORKSHIRE COMBINED AUTHORITY – FIRE

Equality Diversity and Inclusion

FINAL Internal Audit Report: 8.25/26

16 June 2026

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AUDIT OUTCOME OVERVIEW

In line with our scope, included at Appendix A, the overview of our findings is detailed below.

Background: The North Yorkshire Fire and Rescue Service (referred to as the Service) covers a geographical region of over 3,200 square miles. With over 500 staff including wholetime and on call firefighters, it shares some of its support services with North Yorkshire Police.

The Service has a statutory duty under the Fire and Rescue National Framework for England to produce a Community Risk Management Plan (CRMP; the Plan) which sets out its key challenges, risks and operates as a strategic roadmap for the future. The CRMP summarises how it will address such risks and challenges through a number of planning principles. Within the Plan itself, the Service outlines its approach to culture and values, part of which covers Equality, Diversity and Inclusion (EDI). This includes the reinvigoration of Staff Network groups and establishing an EDI and Culture Board (EDIC) chaired by the Chief Fire Officer.

The Service's website has published its commitment to EDI as follows:

"Equality and diversity are important to us, and we are fully committed to delivering our services and employing staff in accordance with the Equality Act 2010."

This is supported by the Service's corporate values, policies and processes all of which reflect the commitment to EDI.

In terms of evolution, the EDI agenda will be directly impacted by the Framework for Change (F4C) project and cultural review which was undertaken by Dr Tom Simcock and Dr Rosie Morrow from Huddersfield University. Their findings were presented in a report entitled; Moving Forward: A Cultural Review of North Yorkshire Fire and Rescue Service and a Framework for Change (January 2026). Their work looked at culture and behaviours within the Service which included EDI. Following the first phase of work, a Behavioural Framework and Leadership Charter will be produced, in alignment with the recommended actions that came out of the report.

Our HR specialists have reviewed EDI policies, processes and strategies in place, and how the Service's approach has been formulated into a wider EDI Strategy Delivery Plan. In addition, we reviewed whether EDI is embedded throughout the wider organisation including through operational staffing processes, within training and in governance and oversight processes.

We were provided with access to reports and other documentation relating to EDI. We also conducted one-to-one discussions with the EDI Manager, Watch Manager, Staff Network Leads, two Station Managers and the Chief Fire Officer. We would like to thank all of those who met with us during one-to-one discussions.

Headline findings The Service has made good progress in respect of bringing the tactical and strategic approaches to EDI together across the organisation, but arrangements are still maturing and will continue to need strong operational embedding, reporting and governance oversight.

Seven **medium** and three **low** management actions have been agreed to help further evolve the EDI agenda.

These cover four themes:

- The need for an **increasing operational approach to embed strategic EDI** as part of the Service's everyday activities. This is required to compliment and implement the Service's EDI Strategy and the suggested actions which came out of the F4C work. Progress is overseen by the Equality, Inclusion, Diversity and Culture (EDIC) Board.

- Additional **EDI data collation and analysis** is recommended to support the identification and analysis of themes and trends, to further aid the delivery of strategic requirements.
- Specific EDI information gathered through engagement surveys, and feedback via Staff Network groups will provide the Service with **increased qualitative and quantitative** data in addition to what is already collated. This will help to identify both red flag areas and those that are progressing well.
- **Cultural awareness of EDI** and buy-in would be best supported by following and reviewing the actions outlined in the EDI Delivery Plan and F4C project recommendations. This would be supported by having an **overarching Communications Plan** and a **phased Roadmap** in place, to align all workstreams together.

This would also help to identify opportunities to support and celebrate successes and to increase understanding of individuals' lived experiences through storytelling. A planned communications approach will add gravitas to the delivery of the overarching Strategy.

We have provided best practice insights throughout the report, based on our knowledge of other similar organisations.

We have identified the following areas where weaknesses in controls were found:

EDI Strategy and Plans

RSM has reviewed the Service's current EDI Strategy 2025 to 2028.

There is an EDI Delivery Plan 2026 – 28 in place. This outlines six priority areas and charts progress against these, through a RAG (red, amber, green) rating system. We understand that the EDIC are accountable owners for this, with a number of departments feeding into it to update and progress actions. The Plan was introduced in February 2026, therefore is not fully developed in terms of content. Updates are made on a quarterly basis, so it is anticipated that in the next few months it will be more fully populated. We understand that the updates will also integrate elements from F4C to further define subsequent actions.

The EDI Manager has recently taken the post. This role is pivotal to ensuring any strategic review aligns with the activity within the F4C and in supporting the EDIC's intention to ensure EDI is central to all Service operations. A clear connection between the Service's strategic objectives and values is vital to EDI success, so that they can ensure EDI is embedded operationally into everyday activity and behaviours. This will help to strengthen the monitoring of engagement through people related activities, such as engagement surveys, training and performance development reviews.

There is a risk that by not developing the operational approach to EDI, there will be a negative impact on its development within broader people related processes, for example, talent acquisition, recruitment and retention, which in turn may increase the risk of harm to employer brand and staff morale. It will be important for the Service to develop and document its longer-term operational approach, which will naturally compliment the strategic direction. As a note of caution, this should be developed with a short to medium term focus, so that the organisation is not overloaded with initiatives that may overwhelm and ultimately hinder the overarching objectives of the EDI Strategy.

It is widely recognised that more could be done to ensure the strategic approach is better entrenched throughout the organisation to support the Service's operational delivery of the EDI approach (aligned to the strategic outcomes). This will be successfully achieved through the development and strengthening of progress monitoring and reporting.

EDI data collation, analysis and reporting

Data is collected and analysed by the Service to ensure it meets its responsibilities as part of mandatory Gender Pay Gap reporting. On reviewing EDIC Board reports, historically there has been little commentary covering EDI data. Therefore, more data could be collated to strengthen operational measures and provide the ability to analyse against EDI objectives. The F4C work has identified a number of areas where EDI and cultural data could be used to better support the Service, one of which is through the Fire Culture Spark.

However, the Service, as part of developing its reporting and the quality of its data, must be clear on what types of data would be beneficial and how further analysis and commentary would continue to inform more broadly on EDI activity and progress. It is acknowledged that any additional data collection and analysis should not detract from the quality of data currently in place but should be complementary in its nature.

More robust data (whether qualitative or quantitative) improves and shapes recruitment processes, informs leaders, provides insights for development programmes, and supports more accurate evaluation of whether EDI initiatives and programmes are effective.

Staff Networks and engagement

Whilst there are a number of Staff Networks in place, internal engagement with them appears to be limited. One to one interviews with members of the Women's Health, Men's Health, and Race and Culture Networks show an imbalance of membership across groups, and as a result activity levels are inconsistent.

Whilst staff engagement scores around EDI themes are improving steadily (76% 2025 versus 71% 2023, caveated by a 29% response rate), no surveys are undertaken which specifically relate to EDI. It is suggested that EDI specific questions are incorporated into either the Staff Engagement Survey or Fire Culture Spark. This will provide additional staff feedback opportunities and data which can be analysed and acted upon. Given that the Service's CRMP is underpinned at every opportunity by EDI, the Service should integrate Staff Network activity within EDIC Board reporting which will help to strengthen internal and external community links.

Raising awareness and internal communications

Any newly defined EDI approach adopted through the CRMP, F4C and EDI Strategy, policies and processes should be robust and well embedded into everyday working. It should also be noted that evidence from across RSM's wider client base suggests that a more informal approach is equally as important as taking a more formal route, in terms of buy-in and generating awareness.

Opportunities for celebrating success and understanding individuals lived experiences through storytelling can add additional gravitas to the delivery of the overarching Strategy. Storytelling can come from colleagues, service users, the communities served by the Service or via external, well-known speakers and/or panellists. A Communications Plan is a targeted way to celebrate successes, both internally for staff and the community within which the Service operates. We understand that this is being developed to help horizon scan and plan EDI activities accordingly.

Whilst we recognise the design and application of the following controls was adequate, some improvements are needed to enhance them. More detailed findings and the corresponding management actions can be found in sections one and two.

Strategy, policy, and procedures

At the time of this review the Service launched its CRMP and Core Code of Ethics which has put the EDI Strategy front and centre through its strategic approach. Even though the EDI Manager has only recently started in position, in practice the implementation of the Strategy is not the singular responsibility of any one person or the People Services team. It is a collective responsibility. From RSM's interviews we understand that there is an appetite to develop EDI further across the Service, and especially around ensuring compliance with the CRMP and the recent F4C work that has been undertaken.

The Service's CRMP and F4C puts EDI at the heart of its approach and ensures full compliance with the Equality Act 2010. This is supported by a variety of policies, procedures and guidance which we found in general to be fit for purpose and available for staff via the Service's website and Intranet. Further enhancements could be made to support delivery on the requirements within the Employee Rights Act 2025. However, these will be introduced over a period of time, therefore implementation timescales will be phased.

Governance and oversight

The current governance and oversight arrangements demonstrate a solid foundation, clear structures, and effective controls in place via the Services EDIC Board. This Board is responsible for oversight of the EDI Delivery Plan, which now includes inputs from F4C. The Author of that work sits as an independent member. Senior Leadership Team (SLT) members are each responsible for a Staff Network Group. To add additional scrutiny, the Mayor's Office is also represented at the EDIC Board

To further strengthen transparency and strategic assurance, future reporting would benefit from deeper insight into monitoring progress, emerging EDI developments, and tangible actions that achieve the agreed objectives and the required impact. Enhancing the narrative in this way will support more informed decision making, providing greater clarity for the Service and those it serves.

Training and development

EDI training and development is currently being evolved. There is some mandatory EDI training in place during onboarding and beyond. An example during onboarding includes an e-learning module called "EDI in the workplace". EDI is featured within wider programmes to help increase awareness, for example in recruitment where there will be an increased focus on conscious inclusion in new courses. A shared Leadership Academy is being developed across Police and Fire. It is envisaged that this will become a central hub for leadership and talent development, providing a structured learning approach and linking to EDI throughout.

A number of practical tools and resources will also become available through the Leadership Portal, including toolkits and guides for all staff and incorporating EDI.

Leadership

The EDIC Board sets and owns strategic EDI direction at the highest level, shaping, embedding and sustaining EDI within its culture and ensuring there is accountability throughout.

We found that there are good levels of engagement (evidenced by increasingly positive staff survey results across the Service). There is a genuine desire by all those we spoke with, and in particular the EDI Manager and Chief Fire Officer to commit to and promote EDI initiatives, which align with suitable people related processes.

Best practice and RSM Insight

To add additional impact to the EDI Strategy, we see various data collection and analysis methods used within our client base. These are usually in the form of:

Ethnicity Pay Gap reporting and/or Disability Pay Gap reporting – whilst currently not a mandatory requirement for organisations over 250 employees, these areas are currently under consultation within the current Government and may provide the Service with an additional overview of the impact of EDI (RSM acknowledge that the Service has already committed to voluntary Ethnicity Pay Gap reporting). It is noted that both of these areas sit appropriately alongside Gender Pay Gap and would provide the Service further opportunities for data collection, analysis and review.

EDI Dashboards – can provide senior leaders and line managers with a regular overview of EDI data over specific periods. This enables further data collation and analysis, which will support the achievement of objectives and requirements contained within agreed strategies. Dashboards developed by People teams provide ongoing reporting on workforce representation, split by the protected characteristics covered under the Equality Act 2010, together with diversity data for new starters and leavers. Our clients report that Dashboards are an evolving tool available to line managers. These can be developed further to include additional diversity representation, in respect of employment relations cases/outcomes, performance, promotion, progression, sickness absence and reasons for leaving.

EDI Self-Assessment Audit – A Self-Assessment Audit document is provided for all teams to assess systems and approaches, which ensure that the organisation’s EDI approach is firmly embedded and consistently underpins the EDI Strategy. It enables teams to take accountability for EDI Strategy and to further understand how EDI principles can be embedded into individual teams at a more local level. Completed Team Self-Assessments can be reviewed and followed up by people teams using a consultative approach, ensuring that any agreed actions are progressed and reviewed.

We typically see training relating to EDI developed through a variety of channels/methods, for example:

Lunch and Learn sessions – providing deeper insight into specific topics such as positive action, clean language, and neurodiversity.

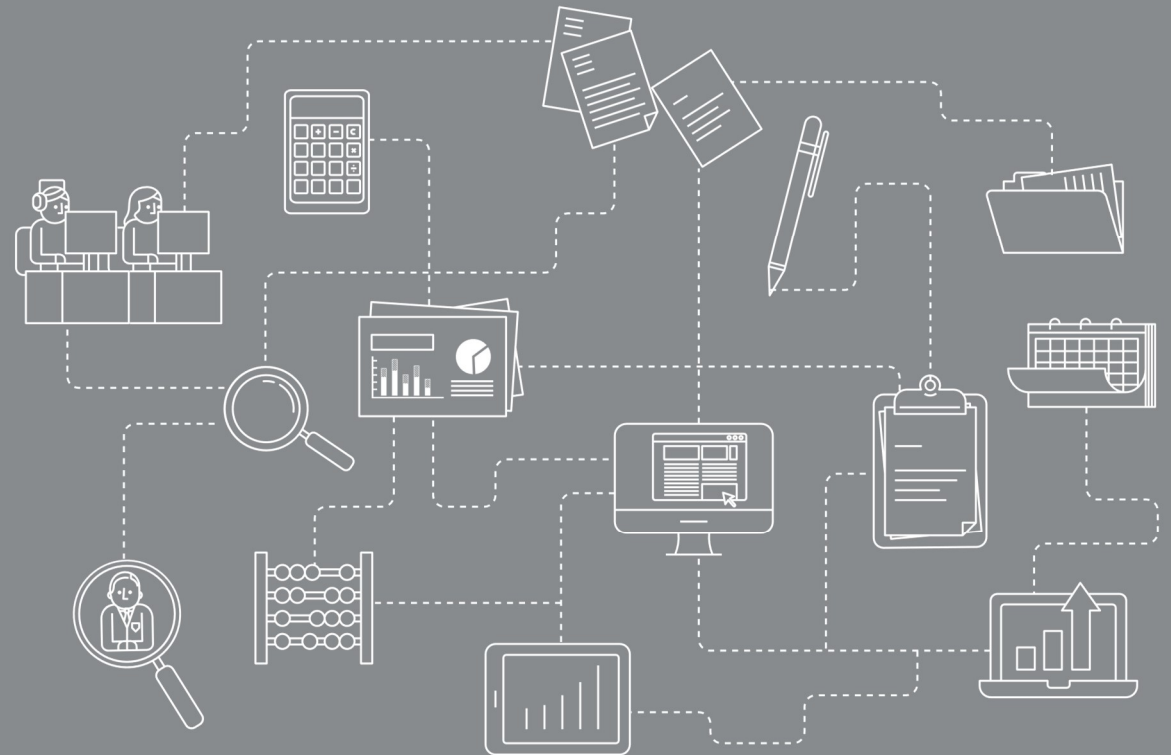
Reverse Mentoring Scheme – a Scheme enabling leaders to benefit from lived experiences and/or the challenges experienced, which helps to enable the organisation to embed a culture of awareness and care. Such an approach is widely known to benefit the overall employee experience, attraction of talent and the promotion of employer brand externally.

Leadership Development Programme – such a programme can develop expertise in respect of EDI for senior leaders. Whilst the personal benefits depend on the individual leader, there is a clear opportunity for the EDI agenda to be given wider visibility through inclusive leadership practices, manager guidance and other tools, therefore increasing leadership accountability.

This type of programme may be similar to what will be developed and available through the Service’s Leadership Academy.

Summary of Actions for Management

01



SUMMARY OF MANAGEMENT ACTIONS

The action priorities are defined as*:

High

Immediate management attention is necessary.

Medium

Timely management attention is necessary.

Low

There is scope for enhancing control or improving efficiency.

Ref	Action	Priority	Responsible Owner	Date
1	Equality and diversity objectives Leaders will continue to ensure there is regular monitoring, reviewing, evaluation and reporting at a strategic level. This will encompass how everyday approaches to EDI are positively impacting on overarching strategic delivery.	Medium	Chair of EDIC Board	31 December 2026
2	EDIC Board to continue overseeing the progress made against the EDI Delivery Plan, ensuring all actions are achieved within relevant timescales.	Medium	Chair of EDIC Board	31 December 2026
3	EDI policies and processes As part of standard practice, the People Services function will ensure that EDI is included within all relevant policies and processes, including the changing legislation as set out within the Employment Rights Act 2025. This will ensure they are aligned with best practice and the evolving regulatory landscape.	Low	Director of People Services	Complete
4	EDI training As there are a number of training and development initiatives in the pipeline, it will be important that the People Services function regularly review and revise the plan to deliver them. Once delivered it will be important to understand the level of benefit they are providing internally, through gathering feedback and re-assessing the content.	Low	Director of People Services	31 July 2026
5	EDI data collection and analysis Incorporate EDI specific questions into either the Staff Engagement Survey or Fire Culture Spark. This will provide additional staff feedback opportunities. <i>(Note, the next survey is due in March/April 2027, and the due date has been agreed accordingly)</i>	Medium	Director of People Services	30 April 2027
6a	Action planning Whilst appreciating that the EDI Delivery Plan is new to the Service, it should be regularly updated. There are a number of gaps where there is no narrative against the actions that are listed, and there are no anticipated completion dates. Without a regularly updated tracker, it will be difficult to see where progress is being made and where more focus is needed.	Medium	Director of People Services	30 September 2026

6b	An overarching EDI Roadmap (plan on a page) should be developed which works in alignment with the EDI Delivery Plan, to plan the implementation of all EDI related activities as part of a phased approach. This should include; anticipated timescales for delivery, how feedback will be gathered, how success will be measured against each initiative, and how these will be reviewed to measure their impact.	Medium	Director of People Services	31 October 2026
6c	As part of action 6b, the People Services function to continue evolving a Communications Plan, to promote all activities relating to EDI, using all available channels including Staff Network Groups. This will provide opportunities for education and awareness through sharing and celebrating success, lived experiences and storytelling.	Medium	Director of People Services	31 October 2026
7a	Governance and oversight Analyse the monitoring and reporting of data to understand whether staff are able to highlight and raise concerns. This should also consider how they are routinely handled.	Low	Director of People Services	31 March 2027
7b	Ensure that there is continual join-up amongst stakeholders associated with developing the EDI agenda. This should include strengthening the feedback loop at Board level with those involved in developing EDI initiatives, Staff Networks and the wider staff population (as appropriate).	Medium	Chair of EDIC Board	31 December 2026

Detailed Findings and Actions

02



DETAILED FINDINGS AND ACTIONS

Our findings are detailed as follows:

Equality and diversity objectives

Control	Equality and Diversity objectives have been established as organisational priorities. Alignment with the Fire and Rescue Plan and CRMP has been considered.
Findings	<p>The Service is bound by its CRMP dated 2025 - 2029 (RSM reviewed) which is available on the Service's website and is supported by the Fire and Rescue Plan (2025 – 2029). Within the CRMP, key achievements are outlined including the formation of an EDIC Board, which is chaired by the Chief Fire Officer and the reinvigoration of Staff Network groups. The plan also confirms key focus areas including:</p> <ul style="list-style-type: none">• Implementation of EDI leadership training for all senior managers• Undertaking Equality Impact Assessments in respect of policies;• Improvement of workforce data;• Launching an inclusive Leadership Programme;• Further developing Staff Networks; and• Utilisation of staff survey and inclusion audits to measure culture and embed the agreed EDI metrics into broader organisational indicators. <p>The CRMP commits to EDI as one of its five principles of the Core Code of Ethics which are: putting communities first, integrity, dignity and respect, and leadership. Our review confirms that progress is already being made in some of these focus areas. It is clear the Service clearly understands its strategic EDI priorities through the content of the CRMP itself. The CRMP and Fire and Rescue Plan substantiates the Service's acknowledgement and understanding of its strategic EDI priorities. It will be important to continuously ensure these are embedded into everyday ways of working and behaviours, whilst monitoring the engagement through people related activities such as staff surveys and appraisals.</p> <p>We understand that the Core Code of Ethics feeds into PDPRs (end of year appraisal process), through which staff have to show how they have demonstrated the values in their everyday working lives.</p> <p>The Service's current Equality, Diversity and Inclusion Strategy 2025 to 2028 is in place (RSM reviewed). At the time of the review this was in the process of being updated, to integrate elements from the F4C project. We understand that there will be a re-launch of the Strategy and a supporting Communications Plan in due course.</p> <p>The Equality, Diversity and Inclusion Delivery Plan 2026 -28 in place (RSM reviewed) outlines six priority areas and charts progress against these, through a Rag system. These include:</p> <p>1 - Training, awareness and development, 2 - Data and transparency, 3 - Community engagement and service delivery, 4 - Leadership and governance, 5 - Inclusive culture and belonging, and; Workforce representation and recruitment.</p> <p>The Delivery Plan was implemented within the Service in February 2026 and is reviewable every three months. There are currently a number of gaps in the narrative which will need to be updated as part of those regular reviews. Actions will need to be reviewed and re-evaluated to ensure they are still relevant.</p>

Equality and diversity objectives				
Management Action 1	Leaders will continue to ensure there is regular monitoring, reviewing, evaluation and reporting at a strategic level. This will encompass how everyday approaches to EDI are positively impacting on overarching strategic delivery.	Responsible Owner: Chair of EDIC Board	Date: 31 December 2026	Priority: Medium
Management Action 2	EDIC Board to continue overseeing the progress made against the EDI Delivery Plan, ensuring all actions are achieved within relevant timescales.	Responsible Owner: Chair of EDIC Board	Date: 31 December 2026	Priority: Medium

EDI policies and processes

Control A review of policies, procedures and guidance documents that supports the delivery of EDI objectives has been undertaken, with a particular reference to recruitment and retention.

Findings RSM were able to review the Service’s Recruitment and Retention Strategy (2024-2026) and the Recruitment and Selection Policy which was updated in 2026. Both are fit for purpose and typical of those RSM would see within its wider client base. They are compliant with current legislation (Equality Act 2010) and best practice. There are clear and effective links to EDI strategy and other people related policies/processes.

It is noted that within the Recruitment and Selection Policy, there is reference to ‘neuro disability’. This may have a negative connotation for those reading and acting upon policy requirements. The Service may want to consider a different interpretation of the word by using the term ‘neurodiversity’.

During one-to-one interviews, positive action was raised as an area of nervousness, especially in respect of embedding this into recruitment and selection processes considering the decisions that line managers may be required to make. The Recruitment and Selection Policy refers to positive action and rightly differentiates between this and positive discrimination. We understand that future training will include this across the combined Service to raise awareness of terminology.

RSM were able to review three vacancies on the Service’s external careers webpage, including On Call Watch Manager, On Call Crew Manager and Service and Storage Manager. Adverts were consistent in their approach, tone and content. An accessibility statement was in place on the careers page which demonstrated good practice. There was no explicit link to the Service’s EDI approach, other than a commitment to equal opportunities. The Service may want to consider enhancing the careers page by broadening the application process. This would allow a wider, more neurodiverse pool of applicants. For example, RSM have seen clients (outside of the Service’s sector) consider enabling video applications rather than the more traditional CV and covering letter approach.

It will be important for the Service to ensure guidance notes are provided in any policy/process review. This will help to ensure that compliance is maintained through the implementation of the Employment Rights Act 2025 over the next 12 – 18 months.

During our interviews, we were able to determine that an objective of the Service’s EDI approach is to be fully compliant with this legislation. For example, the Service will be required to develop and publish a Menopause Action Plan alongside its Gender Pay Gap reporting, as an outcome of the revised legislation.

Furthermore, the Service is strengthening its approach to the inclusion of Equality Impact Assessments (EIA’s), by developing training through the Leadership Academy. This is currently at pilot stage and feedback will inform the content for learning. We understand that EIAs are completed for any business change scenario and are supported by guidance notes (Equality Impact Assessment Guidance, dated 2024) and a process flow (Equality Impact Assessment Process, dated 2024), all of which have been reviewed by RSM and demonstrate good practice. We have also reviewed completed EIAs for:

- Control Staffing Change Proposal (dated December 2024)
- Discipline Procedure (dated October 2024)

EDI policies and processes				
Management Action 3	As part of standard practice, the People Services function will ensure that EDI is included within all relevant policies and processes, including the changing legislation as set out within the Employment Rights Act 2025. This will ensure they are aligned with best practice and the evolving regulatory landscape.	Responsible Owner: Director of People Services	Date: Complete	Priority: Low

EDI training

Control Training is available to all Service staff in relation to EDI practices. Compliance levels are monitored to ensure any mandatory training is completed. Where training requirements are not met, there is a clear escalation process in place.

Findings During one-to-one discussions, we ascertained that some mandatory EDI training is in place. During onboarding an e-learning module called “EDI in the workplace” must be completed.

There are other e-learning modules available such as Equality & Diversity Essentials and Managing Diversity (RSM have reviewed the course slides for these). All EDI training across both Services is currently being reviewed. It is envisaged that some EDI e-learning modules will need to remain mandatory in order to meet the requirements of certain operational roles.

Managing Diversity is a module for middle managers and course completion is recorded in Firewatch, which is the HR system in place.

Developments

A shared Leadership Academy across Fire and Police is being established. It is envisaged that this will launch within the Police in April 2026 and within Fire from July 2026. We understand that the Academy will become a hub for all leadership and talent development activities. As part of this we are told that conscious inclusion will be part of every programme. Through learning pathways inclusive practice will be reinforced rather than delivered as standalone training. The Academy will provide development programmes for all levels of leadership from first line to senior managers. Training will take the form of: personal development masterclasses, classroom style training, workshops (for all staff) and self-directed learning. Access to other practical tools and resources will be provided.

There will also be lunch and learn sessions which will focus on various topics including Equality Impact Assessments (EIAs). We understand that a pilot session has been delivered to the Response and Resilience Team in February 2026. Feedback from this session will help to define how it is rolled out to the wider workforce (estimated summer 2026).

We are informed that EDI awareness within recruitment processes is being developed as part of a recruitment function training session, anticipated to be delivered in Q2 or the start of Q3 in 2026. This will embed conscious inclusion across all recruitment processes and services, helping to promote best practice at each stage. This should ensure fairness, consistency and more inclusive decision making.

With a number of training and learning initiatives being planned and implemented concurrently, it will be important to review and evaluate the delivery outcomes of each, to make sure that they are having the right and expected impact. Although there is a Training Awareness and Development Section within the EDI Delivery Plan 2026 to 2028, there is no narrative, target dates or updated notes showing whether the actions are on track for delivery. Training and development is interwoven across other sections of the Plan and is owned by the Organisational Learning, Development and Inclusion team, so it will be important that good quality narrative is inserted to ensure there is effective join-up across teams.

Best practice - The Service may want to consider implementing the following learning topics either across the wider workforce, or through existing Staff Networks. These areas comprise of the following:

- Let’s Talk About Racism

EDI training

- Don't Walk By
- Social Mobility
- Understanding Neurodiversity
- Allyship

It is acknowledged that for the Service, these may well be some of the topical areas which are already being discussed. However, these may require formalising into a specific calendar of events.

Like many other RSM clients, there are significant opportunities to upskill and train all staff on the impact of the Equality Act 2010, including on the recent legislative changes around the prevention of sexual harassment regulations.

If delivered successfully this training can provide opportunities to increase EDI impact and further collaboration between the Service and the communities served by it.

Management Action 4	<p>As there are a number of training and development initiatives in the pipeline, it will be important that the People Services function regularly review and revise the plan to deliver them.</p> <p>Once delivered it will be important to understand the level of benefit they are providing internally, through gathering feedback and re-assessing the content.</p>	Responsible Owner: Director of People Services	Date: 31 July 2026	Priority: Low
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EDI data collection and analysis

Control	<p>We reviewed how the collection and analysis of EDI data (recruitment, retention and progression) occurs and whether benchmarking against national frameworks has taken place.</p>
Findings	<p>Data</p> <p>The Service collates relevant workforce data to monitor and evaluate EDI activity to satisfy its legislative and mandatory requirements around Gender Pay Gap reporting. The Service's external website publishes its GPG Report annually. RSM were able to review the 31 March 2024 report. The 31 March 2025 report (at the time of this review) was ready for sign off at Senior Leadership Team level and was therefore yet to be published. The report includes data and explanatory narrative including actions taken and progress made. Further, the Service undertakes voluntary reporting of Ethnicity Pay Gap information which informs on progress and future planned activity. Currently, there is no mandatory requirement to report on Ethnicity Pay Gap, however the UK is currently under Government consultation to make Ethnicity and Disability Pay Gap reporting mandatory. RSM would consider the Service to be in a good position to meet such regulatory requirements.</p> <p>There is further opportunity to gather qualitative data which can be used to inform EDI progress and plan future activity. For example, utilising staff survey results, appraisal ratings, and exit interview data all provide additional levels of detail to support the quantitative data that is currently reported.</p> <p>The inclusion of qualitative data is seen as the norm to supplement and enhance quantitative data, and whilst there is always a risk with having significant amounts of data which may or may not be utilised, a formal policy around data collection and storage would support compliance around data confidentiality.</p> <p>Staff Networks - The Service currently has six Staff Network groups comprising:</p> <ul style="list-style-type: none"> • Neurodiversity; • Race and Culture;

EDI data collection and analysis

- Religion and Spiritual;
- Men's Health
- Women's; and
- LGBT+

We have reviewed the Terms of Reference Staff Support Networks (SSN) document dated May 2022. This was due for review in May 2023 and therefore needs updating. This outlines the purpose of the Network groups at the time. We have also reviewed a Proposal to the EDIC Board to Formalise Staff Networks within North Yorkshire Fire and Rescue (NYFRS) dated January 2025. This later document proposes formalising the network structure to ensure that they were operating consistently and efficiently, with clear guidelines, and also that the Terms of Reference (TOR) for each one is in line with the Code of Ethics.

We note that some Network groups have low membership numbers. This should be an area for development and discussion through Network groups themselves and the EDIC Board, to understand if there are any quick to fix solutions around this, for example better promotion of the groups. This is covered as part of the F4C recommended actions.

We understand that originally Tactical (Network) meetings and Strategic EDI meetings were run separately but were merged into one Strategic EDIC Board. Whilst staff and Network leads were consulted prior to this happening, we understand this structure has not allowed for enough free discussion. We have been told that moving forward there will be a subgroup of the Board, to enable Networks to discuss matters outside of the formal Board framework. This will be Chaired by the Deputy Chief and the Network leads. It is hoped that this will encourage increased support for the Network groups, more open discussion and ultimately more progress being made with the overarching EDI agenda.

EDI Engagement Survey

The last staff Engagement Survey was undertaken in 2025. RSM have reviewed the NYFRS Employee Engagement Survey presentation to the Senior leadership team dated 2025. This features a number of Dashboards produced by People Insights.

Although response rates were low at 29%, overall levels of engagement had increased from 74% in 2023 to 79% in 2025. EDI related areas (themes) are summarised as having increased from 71% in 2023 to 76% in 2025. Based on the questions we reviewed as part of the presentation, some had links to EDI, for example the importance of values, health and wellbeing, treating all people fairly and equally, and providing an environment which allows 'free and open expression of ideas and opinions'. Given the requirements within the CRMP, this may be a timely opportunity to expand questions specifically relating to EDI, especially on the back of the F4C work. This would provide more detailed insight to enhance and add to the outputs of the Fire Culture Spark Programme.

RSM reviewed a paper produced by Huddersfield University entitled: Solution Labs: Co-producing practical recommendations for change in NYF and Rescue Service, dated 2025. This summarised a number of thematic areas which came out of the F4C workshops with 243 participants. One of these was EDI. Six EDI related recommendations for change feature in the paper including: 1 - the need for more open and structured discussions on EDI, drawing on lived experiences within a safe environment, 2 - increased EDI training (again through lived experiences and case studies), 3 - Increased informal awareness sessions, 4 - more accessible policies and procedures, 5 - promote the benefits of EDI to everyone, and; 6 - more focus on neurodiversity and wider inclusivity provisions within policy and through internal support channels.

Best practice

RSM typically see the following sample questions in engagement surveys which the Service may want to include in future surveys:

- People with backgrounds like mine are able to succeed here;
 - My manager positively promotes EDI;
-

EDI data collection and analysis

- I feel confident I can report bullying, harassment and discrimination without worrying that it would adversely affect my position;
- People with backgrounds like mine are included in decision making;
- EDI is positively promoted at the very top of the organisation.

We also regularly see more specific questions relating to sexual harassment, which can be very useful given the recent implementation of employment legislation under the Worker Protection Act 2024, for example:

- I have personally seen or experienced sexual harassment in the workplace in the last 12 months;
- I believe appropriate action would be taken where discrimination, bullying or harassment is reported;

Responses to such surveys provide opportunities for further engagement, especially where some areas have attracted less positive feedback. It is widely acknowledged within RSM's client base that by improving staff opinion in these areas, organisations are able to reduce the risk around the following:

- issues relating to wellbeing;
- an increase in formal grievances;
- an increase in attrition rates; and
- potential damage to employer brand and reputation.

Such an approach works well alongside a formal Strategy and wider support mechanisms. This helps to increase engagement levels, raise awareness of colleagues' lived experiences and reduces the risk of inappropriate conduct within the organisation.

Management Action 5	Incorporate EDI specific questions into either the Staff Engagement Survey or Fire Culture Spark. This will provide additional staff feedback opportunities.	Responsible Owner: Director of People Service	Date: 30 April 2027	Priority: Medium
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Action planning

Control A review of relevant action plans has taken place, to ensure lessons learnt and areas for improvement have been identified, to drive continuous improvement.

Findings The Service benefits from the EDIC Board which meets quarterly and includes all the Network leads and Dr Tom Simcock from Huddersfield University (who sits as an independent member). As Author of the F4C, Dr Simcock has been able to independently align delivery of it to a number of accountable actions outlined in the F4C Assessed Recommendations Table. An F4C Action Plan 2026 has been produced (RSM reviewed).

Action plans

The actions incorporate the recommendations of that work, and some are directly linked to EDI. These include: ensuring that through the Leadership Academy, leadership development programmes will be refreshed to include values and inclusion. The Communications Plan will promote key EDI work that has been completed, a Leadership Portal will host toolkits and guides on a range of topics (which will include EDI), and there will be more engagement with Staff Networks as part of reviewing F4C recommendations. The EDI Delivery Plan for the EDI Strategy will be reviewed to prioritise F4C recommendations. It is anticipated that this will be delivered via HR Business Partners in June 2026. The Culture Spark Survey results and feedback from focus groups will inform the Wellbeing Strategy and will help to prioritise both actions relating to EDI and Wellbeing.

Oversight

The EDIC Board is responsible for oversight of the EDI Delivery Plan.

Action planning

The Service has an overarching aim to bring the tactical and strategic approaches in line with each other. RSM were able to review minutes from the last three Board meetings of September 2025, December 2025 and February 2026. Having reviewed these reports, we were able to observe the progress made since the agreement of the original Terms of Reference of the Board itself, through to the actions undertaken and updated statuses of activity at the time of reporting. The latest Board report shows some actions as complete using the red, amber, green (RAG) status, but typically no RAG status was included on developing areas. It would be useful for the Service to regularly complete a RAG status on all action points to provide a clearer opinion on progress (or lack thereof).

As outlined in the Training section above, there is a need to regularly review, update and evaluate actions that are documented in planning documents. It will also be important to consider the actions set within the EDI Delivery Plan and to plot them against a wider Roadmap. This will provide phased timescales, as a visual 'plan on a page', which aligns actions and their implementation in a logical way, looking top down holistically. Wrapped around this would be a Communications Plan (already being considered), which will map out the best ways to promote, share and raise awareness of all EDI related updates, activities and successes along the way. Staff Networks should feed into this to demonstrate the work that goes into planning initiatives and events such as PRIDE and Interfaith Week, to help keep EDI at the heart of everyday life.

Management Action 6a	Whilst appreciating that the EDI Delivery Plan is new to the Service, it should be regularly updated. There are a number of gaps where there is no narrative against the actions that are listed, and there are no anticipated completion dates. Without a regularly updated tracker, it will be difficult to see where progress is being made and where more focus is needed.	Responsible Owner: Director of People Services	Date: 30 September 2026	Priority: Medium
Management Action 6b	An overarching EDI Roadmap (plan on a page) should be developed which works in alignment with the EDI Delivery Plan, to plan the implementation of all EDI related activities as part of a phased approach. This should include; anticipated timescales for delivery, how feedback will be gathered, how success will be measured against each initiative, and how these will be reviewed to measure their impact.	Responsible Owner: Director of People Services	Date: 31 October 2026	Priority: Medium
Management Action 6c	As part of action 6b, the People Services function to continue evolving a Communications Plan, to promote all activities relating to EDI, using all available channels including Staff Network Groups. This will provide opportunities for education and awareness through sharing and celebrating success, lived experiences and storytelling.	Responsible Owner: Director of People Services	Date: 31 October 2026	Priority: Medium

Governance and oversight

Control A review of the governance structure has taken place that monitors, reviews and challenges the Service on the progress that has been made.

Findings Governance oversight is conducted via internal compliance processes which has been evidenced by the EIDC Board Reports which we reviewed (narrative provided within Action Planning).

We were able to establish that the Service is providing increasing challenge around assurance that is focussed on EDI matters, demonstrating continued commitment in this area. We typically see within RSM's client base that risk associated with EDI is usually included on the Risk Register, to ensure a proactive approach to compliance, governance and oversight.

Governance and oversight

It was confirmed that feedback about EDI is sometimes received anecdotally, not necessarily documented. Where it is documented, we understand that it is not necessarily shared to raise awareness. We would expect to see minutes that acknowledge and/or challenge activity to ensure timely and focused progress is made within the current and future strategic remit.

We have reviewed an F4C Update, which was presented as a Strategic Leadership Board Report in April 2026. This gave an overview of the original recommended actions following a review of their suitability. A number of them incorporate EDI themes as stated in the Action Planning section.

Raising concerns

The Service may want to consider whether staff are able to openly raise concerns and, in such circumstances, consider whether the Service is able to rely on data analysis and trends to identify issues and deal with them accordingly. The objectives initially set out in the CRMP and F4C seek to demonstrate that where barriers, weaker processes or levels of mistrust are evident, actions are in place to minimise or remove them accordingly. For example, the Service should have in place:

- Clear, accessible EDI policies and expectations that outline anti-discrimination, bullying, harassment, grievance and whistleblowing routes;
- Methods for staff to safely raise concerns whether that is through line managers, the EDI Manager, People Services, staff networks, through grievances and staff surveys
- Embedding EDI into everyday culture not simply through policy and process;
- A reinforcement of inclusivity through internal and external communications, learning and senior leadership commitment; and
- Regular monitoring and reporting.

Considerations from RSM for inclusion

Further analysis should be undertaken where concerns are raised and where they are not evident. The Service could understand the reason why, which can be achieved through the following channels:

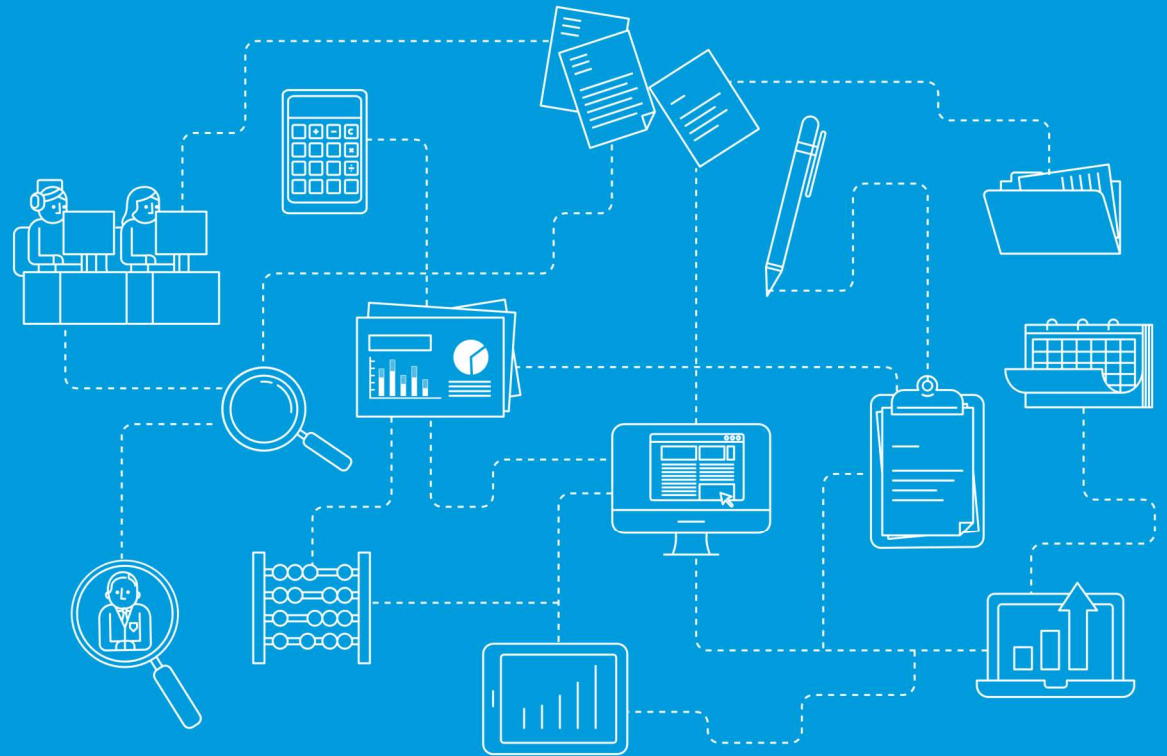
- EDI governance
- Monitoring and reporting
- Pay and Ethnicity Gap reporting
- Cultural indicators (see F4C work recommendations)
- Training to build awareness and reduce barriers
- HR/Employee Relations casework data
- External complaints

Strategic Action Plans, governance and oversight can all provide useful insights.

Management Action 7a	Analyse the monitoring and reporting of data to understand whether staff are able to highlight and raise concerns. This should also consider how they are routinely handled.	Responsible Owner: Director of People Services	Date: 31 March 2027	Priority: Low
Management Action 7b	Ensure that there is continual join-up amongst stakeholders associated with developing the EDI agenda. This should include strengthening the feedback loop at Board level with those involved in developing EDI initiatives, Staff Networks and the wider staff population (as appropriate).	Responsible Owner: Chair of EDIC Board	Date: 31 December 2026	Priority: Medium

Appendices

03



APPENDIX A: SCOPE

This document sets out the key information relating to the internal audit assignment, including the dates and agreed deadlines, the internal audit team and client staff to be involved, and most importantly the scope of the assignment, including the limitations to the scope.

Objective of the review	Strategic risks relevant to the scope of the review	Risk source
The audit will target key areas of focus for the Service on its approach to equality and diversity. This could consider recruitment practices, workplace culture, employee development opportunities, and the representation of diverse groups.	People - Ineffective workforce planning results in loss of key skills and resources at all levels of the organisation.	Corporate risk register



Additional management concerns

There is a substantial governance structure in place in relation to equality and diversity and it is acknowledged that there is a natural link with culture. However, with a People Services Strategy in draft and a Compliance Risk Management Plan about to be finalised, it is recognised that people related areas are likely to be at a high level albeit with delivery plans in place. A newly restructured team is in place and the Combined Authority seeks assurance around its approach to equality and diversity with a focus on recruitment processes.



Scope of the review

The following areas will be considered as part of the review:

- Equality and diversity objectives have been established as organisational priorities and alignment with the Fire and Rescue Plan and Community Risk Management Plan have been considered.
- Review the policies, procedures and guidance documents in place that support the Services delivery of EDI objectives, including where relevant; Anti-discrimination, bullying, and harassment policies, grievance and whistleblowing mechanisms. There will be a specific focus on recruitment practices.
- Confirm training is available to all Service staff in regard to EDI practices and that compliance levels are monitored to ensure any mandatory training is completed. Where training requirements are not met there is a clear escalation process in place.
- Consider how the collection and analysis of EDI data (recruitment, retention, progression) has been conducted and whether benchmarking against national frameworks (e.g., Inclusive Employers Standard) has taken place.
- Review the relevant action plans to ensure lessons learnt and areas for improvement have been identified and work undertaken to drive continuous improvement.

- The Governance structure to monitor, review and challenge the Service on progress including external challenge.

The following limitations apply to the scope of our work:

- We will not confirm that policies and procedures comply with legislation, only that the Force is complying with its policies and procedures.
- We will not include complaints or grievances.
- We will not provide an opinion on the culture of the organisation, perceived or actual.
- Testing will be on a sample basis only.
- Our work does not provide absolute assurance that material errors, loss or fraud do not exist.

Debrief held 11 May 2026
Draft report issued 21 May 2026
Responses received 16 June 2026
Final report issued 16 June 2026

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We are committed to delivering an excellent client experience every time we work with you. If you have any comments or suggestions on the quality of our service and would be happy to complete a short feedback questionnaire, please contact your RSM client manager or email admin.south.rm@rsmuk.com.

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The matters raised in this report are only those which came to our attention during the course of our review and are not necessarily a comprehensive statement of all the weaknesses that exist or all improvements that might be made. Actions for improvements should be assessed by you for their full impact. This report, or our work, should not be taken as a substitute for management's responsibilities for the application of sound commercial practices. We emphasise that the responsibility for a sound system of internal controls rests with management and our work should not be relied upon to identify all strengths and weaknesses that may exist. Neither should our work be relied upon to identify all circumstances of fraud and irregularity should there be any.

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