



Who watches the watches? A response to Nazir Afzal's 'Independent Culture Review of London Fire Brigade'

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June 2023

First published: June 2023

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Introduction

The *Independent Culture Review of London Fire Brigade* is an investigation into the workplace culture of the London Fire Brigade (LFB), led by the former prosecutor Nazir Afzal, after concerns about racism and bullying were raised following the tragic suicide of a young firefighter based at Wembley Fire Station.¹ Allegations of bullying and racism were made at the station where he worked. An official inspection found some staff ‘reported a “toxic” and “pack like” culture.’ The Afzal review is at pains to indicate that the firefighter’s death stemmed from neglect and a hostile culture.

Its headline conclusion was that this was ‘institutionally racist and misogynist’ with a ‘toxic culture’ rife within. But for all the outcry, to what extent does this review bear up to scrutiny and what is the evidence to support these conclusions? While it is not denied that there are *some* deeply unpleasant people working within the fire brigade, the bone of contention is whether or not external experts can diagnose a problem of institutions that is vaguely, if at all, defined, and then propose more bureaucratic measures at the institutional level as remedial to the problems of individual bad behaviour.

Methodology

The review is largely based on an online survey circulated among all LFB staff, and completed by 1,672 employees, roughly 30 per cent. Two hundred and fifty interviews were conducted with ‘current and previous’ staff. More than a dozen focus groups were held, as well as over 1,000 submissions received. Visits to stations were carried out.

The report itself contains no footnotes, nor is a list of ‘stakeholders’ or participating organisations included, which is common practice. The sampling method will not be representative but will cover a significant proportion of staff. The problem, as is argued below, is that Afzal looks for many specifics from which to form a general rule, without any sense of how typical they are. The inclusion of ‘previous’ staff means we may be dealing with complaints that stem back to a different era when some attitudes and prejudices were less taboo. Moreover, few results from the survey are shared.

Institutional racism and misogyny

Afzal writes:

‘My Review found evidence that supports a finding that LFB is institutionally misogynist and racist. We found dangerous levels of ingrained prejudice against women and the barriers faced by people of colour spoke for themselves. Not only were they more likely to be subject to disciplinary action, less likely to be promoted and largely unrepresented at senior levels, but they were also frequently the target of racist abuse.’

¹ <https://www.london-fire.gov.uk/media/7211/independent-culture-review-of-lfb-report953f61809024e20c7505a869af1f416c56530867cb99fb946ac81475cfd8cb38.pdf>

Unfortunately, there are no definitions offered for 'institutional' racism or misogyny. All we have are many examples of unpleasant behaviour, with no attempt to quantify them or say how typical they were. All we have is the word 'many', but how many? And what proportion of female and ethnic minority staff experience these and how often? No answers are supplied.

Examples of abuse are serious and include:

- A black fireman who had a noose put above his locker;
- A Muslim who was bullied over his religion, had pork put in his coat pockets, and a terrorist hotline sign posted on his locker;
- Stories of women being groped in training, belittled, threatened, and 'punched and attacked';
- A woman being the victim of indecent exposure via video calls;
- Firemen going through women's belongings while on home visits looking for sex toys;
- Helmets filled with urine.

However appalling these are, such evidence is strongly anecdotal. We are not told when these things happened (last year or the 1980s?), if they have been verified, or how typical they are. Such events will stand out due to their unpleasant nature, but we should not mistake them for quotidian occurrences because of this. As the review says:

'Most participants found that the place where they worked was a supportive and friendly environment. But they knew of other watches/teams they would not want to work [in].'

Let us assume that the review has in mind the Macpherson definition of institutional racism, used in the inquiry into the Metropolitan Police's investigation (1999) of the murder of Stephen Lawrence:

*'The collective failure of an organisation to provide an appropriate and professional service to people because of their colour, culture or ethnic origin. It can be seen or detected in processes, attitudes and behaviour which amount to discrimination through unwitting prejudice, ignorance, thoughtlessness and racial stereotyping.'*²

The problem with this definition is it tries to define a quality of institutions that is made manifest in the behaviour of individuals, only we have no room left to distinguish between the bad behaviour of individuals *within* institutions as distinct from the institutions themselves. It follows that institutional racism or misogyny, for that matter, must be qualities of institutions, namely policies which may be written (*de jure*) or unwritten but standard practice and condoned (*de facto*).

2

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/277111/4262.pdf

De jure institutional racism/misogyny is unlikely to be present in the LFB since it is governed by the Equality Act 2010 that makes racial and sexual discrimination illegal. We further know LFB has committed 1,458 staff days to diversity and inclusion last year, implying institutional rules against discrimination.^{3 4} *De facto* institutional racism/misogyny is a possibility and something that deserves exploration. Afzal's review gives anecdotal evidence of toleration of abusive behaviours pertaining to race and sex, only there is nothing presented to show how typical this is, sufficient to infer a general unwritten rule. Nor is anything done to substantiate the many examples given. The testimonies are taken at face value rather than scrutinised.

There are also examples given where precisely zero-tolerance has been shown, namely 'a senior figure in the communications team was sacked and had to be walked off the premises after expressing views on race that were not aligned to LFB's values', and '... it was widely known that a Director of Communications had been dismissed for inappropriate comments relating to the feelings of people of colour.' Sackings for saying the wrong thing.

Given the recent revelations concerning the Metropolitan Police, it seems credible to say there was insufficient oversight there as such to imply a tolerance of police officers who were a danger to females. This would be enough to speak of a *de facto* institutional defect in the Metropolitan Police. Violently criminal police officers such as David Carrick and Wayne Couzens appear to have been harboured while the force is currently reviewing past allegations made against 1,071 officers and other staff over a period of 10 years (the Met employs 45,000 people). According to Met Commissioner Sir Mark Rowley, we should expect 'two or three Met Police officers per week' to appear in court in the coming months.⁵ In this light, tolerance of abusive behaviour against women and ethnic minorities within the fire brigade is certainly a possibility, but difficult to evidence. Note that the Afzal review holds that comparisons with the Met are not appropriate in their entirety.

Afzal's conclusion that the LFB is institutionally racist/misogynist rests on the fallacy of composition, which is to wrongly infer a judgement on the quality of the whole based on a fraction of its parts. Plenty of examples are presented of unpleasant behaviour from which a judgement on the LFB is made, but this is not enough. Instead, what he needs to show are either (1) an official policy and/or (2) a general tolerance of abuse based on credible, reliable and replicable evidence. It should be stressed that the latter is not easily done, but that does not mean conclusions can be arrived at before they can be substantiated.

³ https://www.conservativewayforward.com/files/ugd/acef4a_5b5ec1d9017f40b987a68110f70d276c.pdf

⁴ The Macpherson report found no evidence of racist policy within the Metropolitan police or racist behaviour beyond some outmoded language. It says, 'It is vital to stress that neither academic debate nor the evidence presented to us leads us to say or to conclude that an accusation that institutional racism exists in the MPS [Metropolitan Police Service] implies that the policies of the MPS are racist. No such evidence is before us. Indeed the contrary is true. It is in the implementation of policies and in the words and actions of officers acting together that racism may become apparent. Furthermore we say with emphasis that such an accusation does not mean or imply that every police officer is guilty of racism. No such sweeping suggestion can be or should be made.'

Also, 'In this Inquiry we have not heard evidence of overt racism or discrimination, unless it can be said that the use of inappropriate expressions such as "coloured" or "negro" fall into that category.'

⁵ https://www.bbc.co.uk/news/uk-england-london-64400235?at_campaign=KARANGA&at_medium=RSS

The review also claims 'LGBTQ+ staff... are treated unfavourably compared to others'. However, little evidence beyond the anecdotal which may not be representative, is presented. Consider the following extract:

'Similarly, the LFB rating on the Stonewall Workplace Equality Index is relatively low and we heard worrying examples of intolerance towards LGBTQIA staff. One example is cited below:

*"I think the brigade is complicit with homophobia and transphobia. The evidence for this is when I've been involved in making LGBTQ+ -centred content for the brigade there were homophobic comments and replies on social media from fans of the page telling me to 'f*** off, stick to firefighting' and asking what the point of it was etc. In the wake of a bake sale that was held recently in Union Street for a trans day of awareness, the post received loads of transphobic abuse and harassment on social media – and the Brigade's official social media channels stayed silent and did not respond to the Internet trolling. This left members of the brigade to have to defend themselves on their own personal social media handles."*

Stonewall is a charity which sees itself as 'a professional campaigning organisation' that would fight for 'rights in politics, in the media, in the courts and everywhere we learn, work, pray and just exist'.⁶ Its workplace index simply rewards those members who conform to its own ideological expectations. The example given is perhaps the account of an activist working in LFB who has not got his/her way in introducing highly contested ideas into the fire brigade, and little more. The wider question of why a public body such as LFB is participating (and paying) into a scheme run by Stonewall, which campaigns to change the law, is not asked by the review.

There is also a degree of conceptual stretching in Afzal's report. For example, male resistance to the admission of women into a traditionally male-dominated workplace is not the same thing as hatred of women, this being the definition of misogyny. Perhaps an attempt should have been made to understand why such resistance exists; that through the admission of women, men might perceive losses of status as well as gain new unwished-for restrictions on how they behave. In addition, as with concerns for the armed forces and the police and probation services, men remain, on average, larger and stronger than women (with more skeletal muscle, more upper-body and lower body strength), and so you can empathise with why some men might prefer to work with other men in dangerous and demanding situations where life is often at risk. Moreover, some suppositions on the review's part appear hyperbolic and hard to believe, such as:

'Any close inspection of some of the fire stations shows a watch culture, where men are sometimes huddled around a screen watching porn, which belongs in the last century.'

⁶ <https://www.stonewall.org.uk/our-impact>

An alternative explanation for disparity

The Afzal Review notes disparity between white and ethnic minority employees in things like promotion and disciplinary action as evidence of institutional racism within the fire service. Not much by way of figures is presented, only we are told minority staff are ‘more likely to raise a grievance and twice as likely to be subject to disciplinary hearings’. However, as Thomas Sowell has argued, it is an error of logic to assume that the cause of any given disparity between groups is necessarily to be found within the place where the statistics are collected.⁷ It may very well be the case that groups enter the fire service with already varying outcomes, leading to further differences later on, that have nothing to do with the institution that they occupy, in terms of causation.

A freedom of information request reveals that there are differences in test scores between white and non-white groups of applicants to LFB. Two tests are sat, one verbal reasoning and one calculation test. For whites, the average percentile score is 77, while for non-white it is 67 on the former, while the respective scores on the latter are 67 and 61.⁸ These slight differences will have the potential to translate into large disparities in outcomes at the extremes of the distribution, irrespective of whatever racial discrimination there might be. Since we know such tests predict workplace performance reasonably well, then it would be regrettable but still reasonable to expect disparate outcomes in things like promotion and disciplinary actions.⁹

Disciplinary action and formal grievances

Actual figures from LFB indeed show that non-white staff are over twice as likely (2.08 times on average) to be disciplined, but also that the numbers are small in absolute and relative terms. Between 2014 and 2022, 13.3 non-white staff have been disciplined on average per year, compared to 34.6 white. Relative to their numbers overall, that is 1.5 and 0.72 per cent, respectively.¹⁰ Note that the large disparity will stem from the fact that the probabilities are small. The disparity in *not being disciplined* is by a negligible factor of 1.08 in favour of whites (that is, $0.9928 \div 0.985$).

Afzal’s review also does not tell you that the outcomes of disciplinary hearings are broadly equal.¹¹ This would suggest even treatment and that the cases being heard were perhaps warranted, irrespective of their disproportionality. Also omitted, is the fact that disciplinary action is seldom initiated against women and when it does happen, they are much less likely than men to be dismissed (on average five per cent of cases involve women, with just five per cent resulting in dismissal, compared to 12 per cent for men). You cannot maintain that disproportionate outcomes to the detriment of ethnic minorities are evidence of

⁷ Thomas Sowell, (2018) *Discrimination and Disparities*.

⁸ https://london-fire.gov.uk/media/7325/70711_response.pdf

⁹ <https://www.psychologicalscience.org/news/releases/do-aptitude-tests-really-predict-your-performance.html>

¹⁰ <https://data.london.gov.uk/dataset/hr-statistical-abstract>

¹¹ <https://data.london.gov.uk/dataset/hr-statistical-abstract>

institutional racism, and that there is institutional misogyny when you see disproportionate outcomes to the detriment of men.

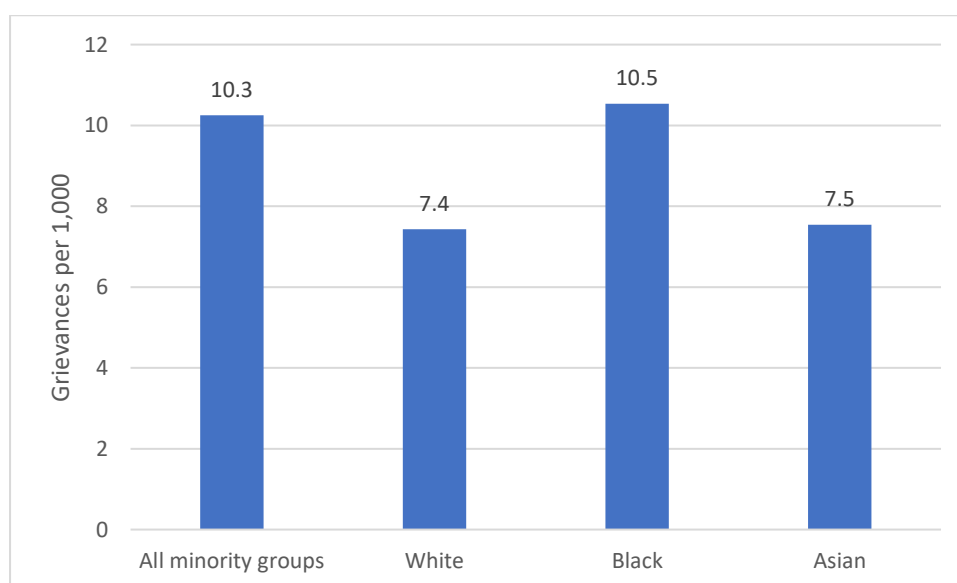
Table 1. Average outcomes of disciplinary procedures in LFB by ethnicity (2014-22)

	Dismissed	Formal action	Informal action
White	11%	82%	5%
Ethnic minority	12%	85%	3%

Source: LFB.

The Afzal review makes much of the fact that ‘BAME staff are more likely to raise a grievance’. What it does not tell you is that this is largely down to more grievances from black staff; for Asian, there is little difference from whites, as seen in the graph below. Nor is it told just how few grievances are raised by ethnic minority staff in absolute terms – an average of nine a year from a population of around 900. Nor that men raise on average roughly the same number of grievances as women (eight per 1,000 compared to seven).¹² In the last year to March 2022, five grievances were raised by ethnic minority staff, two of which were over sick pay.¹³ Such figures are not consistent with the ideas of ‘institutional racism and misogyny’.

Figure 1. Average grievances rates by ethnicity in LFB (2014-2022)



Source: Civitas analysis of LFB data.

¹² <https://data.london.gov.uk/dataset/hr-statistical-abstract>

¹³ https://airdrive-secure.s3-eu-west-1.amazonaws.com/london/dataset/hr-statistical-abstract/2022-12-08T14%3A40%3A52/LFC0712%20People%20Services%20Performance%20Report%20Q4%202021-22.pdf?X-Amz-Algorithm=AWS4-HMAC-SHA256&X-Amz-Credential=AKIAJJDIMAIVZJDICKHA%2F20230209%2Feu-west-1%2Fs3%2Faws4_request&X-Amz-Date=20230209T151357Z&X-Amz-Expires=300&X-Amz-Signature=5a927d9aaf7f5edbfef32dfb1ff01fc616661cb7840cd60067637e94f58b1177&X-Amz-SignedHeaders=host

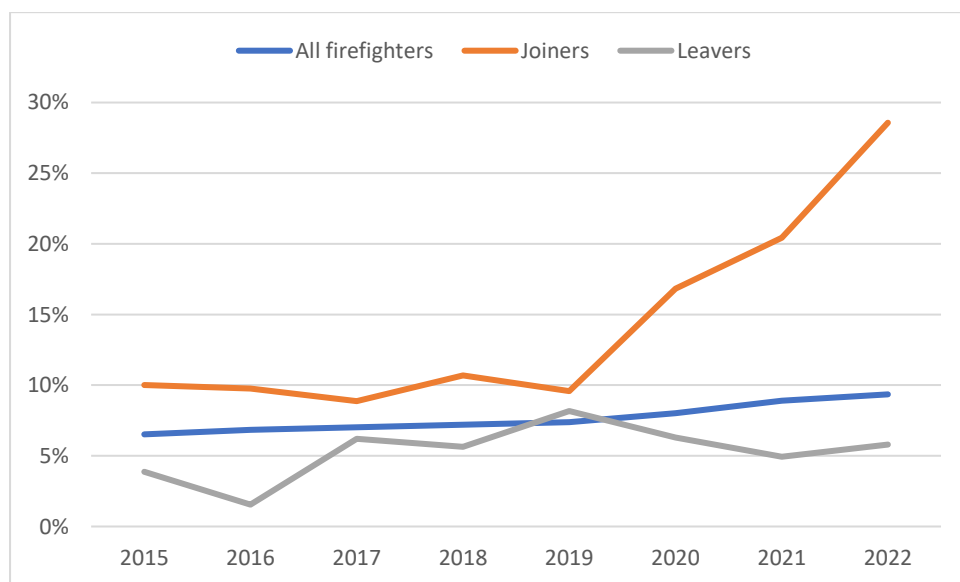
Culture & bullying

The existence of a 'toxic' culture is inferred from the examples given of abusive behaviour, some of which were referenced above. The review claims, 'we heard plenty of examples of extreme bullying that took place on watches', with prominence given to one account claiming 'there were fights and I nearly had my legs broken... I've been urinated on, headbutted, had cold water poured over me. It was horrendous'. A 'brutal initiation culture' existed in the 1990s but is no longer in place we are told, with the watch tending 'to be seen as a place that's almost outside the law with regard to norms of behaviour'. One source said, 'Bullying and harassment has [sic] always been here'.

That such bad behaviours are atypical, however, is supported by one of the few sets of figures Afzal presents, showing just 12 people have left LFB between 2018/19 and 2021/22, citing bullying or harassment – an average of three a year. The most common reason for leaving the LFB is retirement, with 100 leaving each year on such grounds, implying most people wish to continue working there all the way through to retirement. Workplaces where abuse was rife would not present such figures.

Another important but overlooked indicator is the sex and ethnic make-up of those joining the fire brigade as firefighters, as well as those leaving. As seen in the graph below, women have tended to be overrepresented among the joiners, especially in recent years, as well as proportionately represented, if not slightly underrepresented, among leavers.¹⁴

Figure 2. Share of women among operational staff



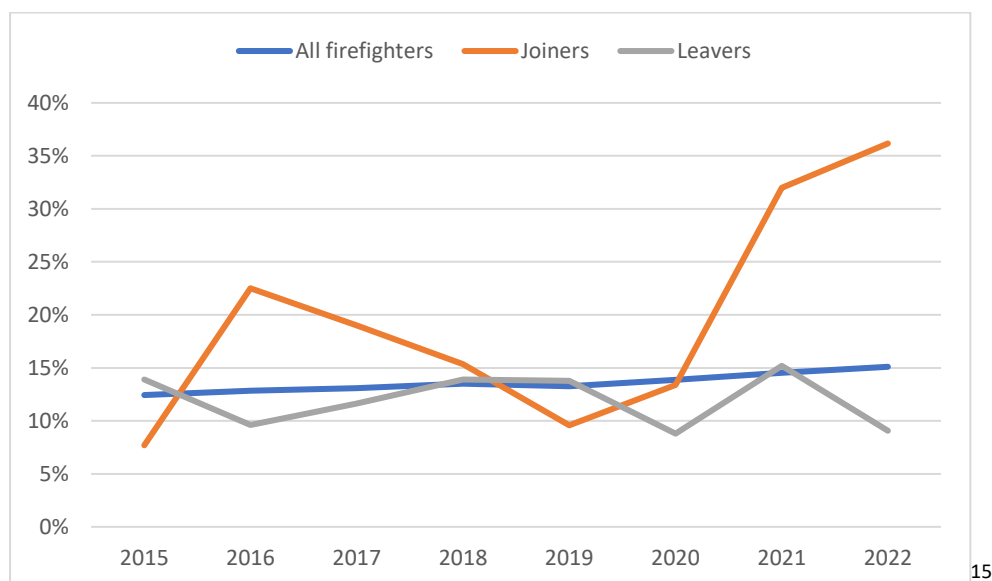
Source: LFB.

A similar story is evident for ethnic minorities, judging by the graph below. Whatever the reasons for these trends, the data are not consistent with LFB being an unattractive place for women or ethnic minorities to work. There is no exodus of them, that would be

¹⁴ <https://data.london.gov.uk/dataset/hr-statistical-abstract>

expected if it were truly ‘institutionally racist and misogynist’. On the contrary, a career as a firefighter at LFB is increasingly attractive to such people.

Figure 3. Share of ethnic minorities among operational staff



Source: London Fire Brigade.

Note that the sharp rises in the shares of women and ethnic minorities may be welcome but come with the risk of inappropriate appointments since it is likely they stem from third party interventions. The data presented above would suggest LFB as an institution is actively seeking women and ethnic minorities, implying on the whole that it works to their favour, irrespective of whatever chauvinistic behaviours there are conducted by a minority of its employees. LFB currently uses targets as well as ‘stretch targets’ in its recruitment of women and ethnic minority firefighters.¹⁶

The atypicality of bullying is further supported by the review’s admission that ‘most participants found that the place where they worked was a supportive and friendly environment’. The conclusion that there is a prevailing unpleasant and chauvinistic culture is not supported by the evidence, despite the obvious fact of some unpleasant chauvinists within the LFB, as there are, unfortunately, in most other walks of life.

The idea that the watch culture is necessarily wrong and can be commanded and replaced with something else by third parties is unrealistic as well as underlying Afzal’s review. Firefighters will often tell you how their camaraderie is necessary in forming the bonds of trust they need when working in life-threatening conditions. The alternative to a

¹⁵ https://airdrive-secure.s3-eu-west-1.amazonaws.com/london/dataset/hr-statistical-abstract/2022-12-08T14%3A40%3A52/LFC0712%20People%20Services%20Performance%20Report%20Q4%202021-22.pdf?X-Amz-Algorithm=AWS4-HMAC-SHA256&X-Amz-Credential=AKIAJJDIMAIVZJDICKHA%2F20230522%2Feu-west-1%2Fs3%2Faws4_request&X-Amz-Date=20230522T122252Z&X-Amz-Expires=300&X-Amz-Signature=bee59e6262808bb6cb6c0630a64a92e653e125aeb347307ce858ca3d89adcffc&X-Amz-SignedHeaders=host

¹⁶ <https://data.london.gov.uk/download/hr-statistical-abstract/78d2b16a-850f-4584-b465-6836dadcb007/LFC0712%20People%20Services%20Performance%20Report%20Q4%202021-22.pdf>

spontaneously-formed watch culture is something imposed and micromanaged by third parties, which will not produce the tight bonds necessary to do this vital and dangerous job. Rather, it seems likely to drive people away. Notably, the numbers of resignations from firefighters are increasing from 30 in 2014, to around 50 per year more recently, while the numbers of transfers away from LFB to other brigades has grown from eight to 31 between 2014 and 2022.¹⁷

Who watches the watches?

Who is responsible for this review and what professional backgrounds do they have? Nazir Afzal is a former Chief Crown Prosecutor for North West England, who has distinguished himself with some brave prosecutions, most notably the Rochdale ‘grooming gang’. He is currently the Chancellor of the University of Manchester. He is described as ‘passionate about social justice’.

Also contributing was Rea Prouska, who is a professor of Human Resource Management at London South Bank University, as well as an academic member of the Chartered Institute of Personnel and Development, and affiliate member of the Chartered Management Institute. Jeff Greenidge is a former teacher as well as the ‘first-ever’ Director for Diversity for the Association of Colleges and the Education and Training Foundation. Leslie Bowman is a retired fireman and was the country’s ‘longest serving black senior officer’, and who led the LFB response to the Macpherson Review, being responsible for a ‘corporate analysis of equality and diversity’.¹⁸ Jo Yarker is an occupational psychologist, as well as ‘managing partner of Affinity Health at Work’. She is further a reader at Birkbeck College. Yasmin Khan is a ‘Welsh government national adviser, charity director and diversity specialist’, who is ‘passionate campaigner’ for ‘eradicating violence against all women and girls worldwide’.

These individuals are drawn from academia or HR-related fields (human resources), with ties to the ‘diversity and inclusion’ sector, who are likely to come down in one direction, as well as having an academic or HR interest in the types of interventions recommended as remedial (discussed below). Incidentally, on his retirement Bowman said, ‘I’m really going to miss working with a nice group of people and being a Borough Commander responsible for 180 staff who I all know personally’ – a statement at odds with the ‘toxic culture’ portrayed by the review.¹⁹

Some of the participants in the review are also clearly activists. We have already mentioned one piece of testimony which was presented as evidence of discrimination. Further signs of activist input include an extract from an open letter from a black firefighter who resigned complaining about a lack of ‘anti-racism work’. ‘Anti-racism’ is no longer a simple statement of moral belief, but a contentious political doctrine that favours ‘the only remedy to racist discrimination is antiracist discrimination’ and that ‘racial discrimination is not inherently

¹⁷ <https://data.london.gov.uk/dataset/hr-statistical-abstract>

¹⁸ <https://uk.linkedin.com/in/les-bowman-qfsm-808742b1>

¹⁹ <https://www.london-fire.gov.uk/news/2016-news/enfield-borough-commander-les-bowman-retires-after-more-than-30-years-of-service/>

racist’, at least according to its chief proponent Ibram X. Kendi.²⁰ Highly partisan complaints – for example, ‘Campaigns such as “Black Lives Matter” are not supported, including taking the knee, and this has a real impact on black staff who take this as a personal affront’ – are presented as reasonable and widely-shared without evidence. In 2020, 44 per cent of ethnic minority people felt BLM had increased racial tensions, indicating this did not have universal support.²¹ Endorsing these gestures would amount to a politicisation of a public service bound by impartiality, and so it is understandable that LFB would be reluctant.

As mentioned, the review is in part based on an online survey, which in addition to the flaws addressed earlier, will also have a bias towards those who wish to complain. The section on leadership portrays a dysfunctional service, only the survey found 70 per cent felt they were well managed. Nevertheless, the focus is largely on the complaints, for example:

‘... going past my immediate line manager things tend to get lost in the ether. Good ideas go nowhere and corporate drivel is spouted.’

Such complaints will be common place in any large-scale bureaucracy. We further learn the leadership has its own frustrations with the rank and file, with an inability to get rid of poor firefighters noted.

Human resources

The sections devoted to current HR portray a department in flux and ‘out of kilter’ with best practice. Its policies are many and incoherent, numbering 114 in sum, apparently. The People Services Directorate employs over 100 people, but struggles to review policies in a timely fashion, with over half having failed to have been reviewed within the set time frame. It was only set up in 2018, yet already it seems to have the tell-tale failings of any bureaucracy.

Nevertheless, its principal policies appear to be under review with changes being made, following critical reports from the Grenfell Tower Inquiry and His Majesty’s Inspectorate of the Constabulary and Fire and Rescue Service (HMICFRS), both in 2019, plus an internal review. Note that a ‘new behaviour framework’ is currently being ‘embedded’, as well as a ‘Togetherness strategy and policy’ based on ‘four pillars’ of ‘building a culture of belonging, being inspired by difference, being at the centre of London and their communities and delivering excellence through inclusion.’

Its current ‘Target Operating Model’ (or TOM) is a policy that outlines the responsibilities of People Services. It *already* includes counselling and trauma, wellbeing, cultural change, diversity and inclusion, coaching and mentoring, learning support – all things touched upon by Afzal’s review. However, this is being revamped to extend the role of a professionalised HR to include ‘centres of expertise’, meaning ‘small teams of HR experts with specialist knowledge’. The review bemoans that just 35 per cent have ‘HR-related professional qualifications’ obtained by the Chartered Institute of Personnel and Development. Most

²⁰ <https://www.penguin.co.uk/articles/2020/06/ibram-x-kendi-definition-of-antiracist>

²¹ <https://www.theguardian.com/world/2020/nov/27/black-lives-matter-has-increased-racial-tension-55-say-in-uk-poll>

acquire their training on the job, while the review claims an apparent 'skills deficit urgently needs addressing' to bring about 'cultural change'.

As already mentioned, LFB committed 1,458 staff days to diversity and inclusion last year.²² If we accept Afzal's conclusion of institutional racism and misogyny, then this would imply *not enough* days, nor any guarantee that more would mean success.

The recommendations made by the review encompass the following:

'Creating a workplace where everyone is afforded dignity'

A 'zero tolerance' policy for bullying, racist or misogynistic behaviour is recommended, along with making it easier to complain and providing provisions for anonymous reporting. 'In conversation with the workforce and stakeholders', new 'Brigade values' should be developed that 'inform the core code of ethics', as well as all procedures including promotion and discipline. A 'culture dashboard' of LFB stations and teams should be established, to mark them in terms of their toxic culture, based on a variety of metrics. Body-worn video cameras should be considered for home safety visits. More 'EDU training' should be provided for managers, as well as an independent complaints service.

'Better engagement with London communities'

Borough Commanders should build better relationships with their local communities, 'including learning from them', with their 'local Borough Community Risk Management Plan, informed by the community and local partners'. Recruitment and progression should favour firefighters who 'reflect and can demonstrate their commitment to London's diverse communities'.

'Building a leadership model of trust'

Senior leadership working more closely with regular staff; senior selection panels appointed by 'independent chairs and panel members' with interests declared, including Freemasonry.

'Improved wellbeing'

More training for leaders and managers to identify mental health problems, that is 'well funded, well signposted, well known, and well used'. Staff should have 'better information on employee red flags that signal the need for early intervention to prevent deteriorating mental health'. LFB should find out why its employees are more stressed, anxious and depressed than the national average, and the establishment of a 'clear and robust system of reporting' for cases of suicide. A review of the 'triggers' necessary before mental health interventions are made, including a 'more detailed critical incident log of all firefighters' to show what they have been exposed to and indicate where 'wellbeing' measures are needed.

'Transforming HR services'

An independent review of 'People Services resourcing and provision' to improve 'professionalism and effectiveness of the service', delivering 'leading-edge HR solutions that

²² https://www.conservativewayforward.com/files/ugd/acef4a_5b5ec1d9017f40b987a68110f70d276c.pdf

mangers and staff trust' which should ensure HR 'plays an integral role in maintaining an inclusive culture' is called for. A 'HR Data Analytics Strategy' and 'HR data analytics skills' should be developed, in order to design and implement 'People Services' strategies, policies and practices', and pointedly, 'lead the organisation in the desired cultural change'.

A 'LFB workforce planning strategy' will use data to understand the 'reasons why BAME staff and women are significantly under-represented' and 'design intervention to improve this ratio', with the desired outcome being a workforce that 'better reflects the communities they serve' at all levels. Disparate outcomes in promotion and grievances should be investigated and reviews of procedures should be undertaken.

All these proposals can be criticised for both lacking in legitimacy or any evidence base for their leading to improvements, let alone their capacity to foment division. Too much emphasis on governing through 'protected characteristics', combined with introspective mental health programmes, may very well undermine resilience and cohesion. More HR bureaucracy will be created, that exists not to simply manage employees but to engage in utopian social engineering in which there is no competence. Metrics of 'toxicity' will be hard to construct, ambiguous, easily misconstrued, and may serve to put people off joining.

It appears there is already a movement towards professionalisation of HR, which Afzal's review seeks to capitalise upon. However, professionalisation, defined as greater closure through higher ethical and qualification standards, can be criticised for a tendency to amass power and instil ideological conformity, undermining the inclusivity that is hoped for. In any case, the existing regime within LFB is only six years old, covers much of the areas of concern already, and is a mess, apparently, so what hope is there for these grand reforms?

This is troubling in that while London's population is rapidly growing, the number of operational staff (firefighters) has dropped from 5,337 in 2014 to 4,545 in 2022 (-15 per cent). At the same time, the number of support staff has increased from 825 to 943 over the same period (+14 per cent). That is a rise from 15 bureaucrats for every 100 firefighters to 21. Meanwhile, the number of people classified as 'top earners' among support staff has risen from 138 to 202, while among firefighters, the number has remained practically unchanged. Most of the new top earners are women, at 72 per cent. The share of female top earners in support roles has increased by 10 percentage points since 2014, while the share of female firefighters by just three points.²³

The number of ethnic minority top earners among support staff has also increased from 13 to 31, while the number among firefighters has held roughly constant. Indeed, the ethnic minority share of top earners has risen by six percentage points since 2014, while their share of firefighters by just three points.²⁴ It would appear LFB's attempts to diversify its workforce prove lucrative mostly for women and ethnic minorities in bureaucratic roles. This might explain why HR is keen to promote this agenda, rather than ask the right

²³ <https://data.london.gov.uk/dataset/hr-statistical-abstract>

²⁴ *Ibid.*

questions. In any case, it is clear that LFB is succeeding in diversifying its top earners much faster than its firefighters, who have declined in number.

Interestingly, LFB has been perhaps most successful in increasing the diversity of its firefighters in terms of disability, with a 111 per cent increase between 2014 and 2022. That is a rise from 140 to 296. Presumably, this reflects an enlarging of what may count as a disability.

Community involvement will further risk political activists capturing the LFB and using it to promote their political agendas that detract from its immediate priorities (fire and rescue), as has happened in the police with independent advisory groups.²⁵ Sworn beliefs in 'diversity' will serve to instil further ideological politicisation, while diversifying the workforce may mean rewarding and punishing people based on their immutable characteristics. Anonymous reporting will encourage narking and could lead to situations where in order to preserve anonymity, the accused cannot be told what they are accused of since doing so would lead to identification. This is *literally* Kafkaesque.

The result will be a replacement of the watch culture with a culture that is watched, by an elaborate bureaucracy with a vested-interest in generating complaints. The review is quite clear about its demands for a wholesale revamp of HR, with it taking charge of 'cultural change'. The costs to this will be destruction of trust and end to informal self-regulation, which Afzal's review admits takes place within watches. While the watch culture has its excesses, which Afzal is trying to get to grips with, there is no sense in throwing the baby out with the bath water. Again, it is entirely possible that bad behaviour against women and ethnic minorities has been tolerated, sufficient to qualify as *de facto* institutional defects. It does not follow from this that more bureaucracy is needed, rather than a better application of what already exists. Sir Mark Rowley is clearing the Augean stables of the Metropolitan Police using existing measures rather than creating new ones.

Note that an internal LFB investigation made 24 recommendations for improvements after the suicide of Jaden Matthew Francois-Esprit, while the coroner's 'prevention of future deaths report' made a further seven. According to London Fire Commissioner Andy Roe, 28 of these have already been enacted.²⁶ Afzal makes 23 recommendations of his own. This suggests we may be looking at an excess of bureaucratic measures, many of which have little to no impact on the outcomes they are intending to change.

Aftermath

As has been argued, the Afzal review proves on close inspection to be tendentious without having made its case. The charges of institutional racism and misogyny have not been substantiated by sufficient evidence. Mostly we have a series of anecdotes that are undoubtedly troubling but taken at face value and then construed as definitive. The authors

²⁵ <https://www.civitas.org.uk/content/files/2572-A-Hate-Crime-Policy-WEB.pdf>

²⁶ <https://www.theguardian.com/uk-news/2022/aug/26/jaden-francois-esprit-london-firefighter-family-demand-apology>

do not appreciate that there are corrupt and incompetent doctors, but that is not sufficient to damn all doctors, say, or the NHS as a whole.

Yet, this has not stopped the London Fire Commissioner Andy Roe from accepting all its recommendations, seemingly without hesitation, and he has promised to dismiss anyone guilty of misconduct.²⁷ Roe spoke of this not being down to ‘a few bad apples’ – only that is all that has been evidenced.²⁸ Politicians rushed to express their condemnation.²⁹ Yet, the logical errors of the report can be summarised as a few bad apples being taken as evidence of a problem with the barrel they are contained in. The media roundly repeated the findings without a hint of scepticism, as is standard practice with reports of this nature. They largely focused on some of the more egregious examples unearthed of abuse and bad behaviour. This was encouraged by the head reviewer who told the BBC:

‘We’ve heard example after example about women who were harassed or sexually assaulted – constant sexual taunting to the point that I am now saying that the London Fire Brigade is institutionally misogynist. In addition to the misogyny, there is an enormous amount of racism. One black man had a noose put up above his locker, another Muslim officer had bacon rolled on his plate before he ate.’

Afzal has further claimed to have been contacted by employees in the NHS, BBC and the police and has called for a national inquiry to address the problems of racism and misogyny therein.³⁰ If such an inquiry were modelled on similar methodological standards, then the conclusion would be a *fait accompli*. Of course, you will find bad people in any large-scale organisation. All you need is an internet survey to solicit complaints. This is not sufficient evidence of the state of any given institution as a whole.

LFB has further been placed under ‘special measures’, meaning enhanced monitoring by His Majesty’s Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) – which cited the Afzal review as justification for this. It stated there was ‘cumulative evidence from its last inspection and afterwards of unacceptable behaviour within the brigade, including discrimination and bullying’.³¹ All this flounders on the review’s inability to verify the circumstances and typicality of the evidence cited. Do they really require intervention from on high, or are they merely a matter for better internal disciplinary regulation? And why is the official inspectorate demonstrating credulity by being swayed by a tendentious report?

That whatever problems there were, were not common place nor generally severe is further underscored by data released by LFB concerning calls to its new External Complaints Service launched in November of last year to deal with things like bullying and to coincide with the

²⁷ <https://www.msn.com/en-gb/news/newslondon/london-fire-brigade-must-root-out-bad-leadership-says-former-fire-minister/ar-AA153xq1>

²⁸ <https://bbcgossip.com/news/london-fire-brigade-head-vows-action-after-culture-of-racism-and-misogyny-revealed/>

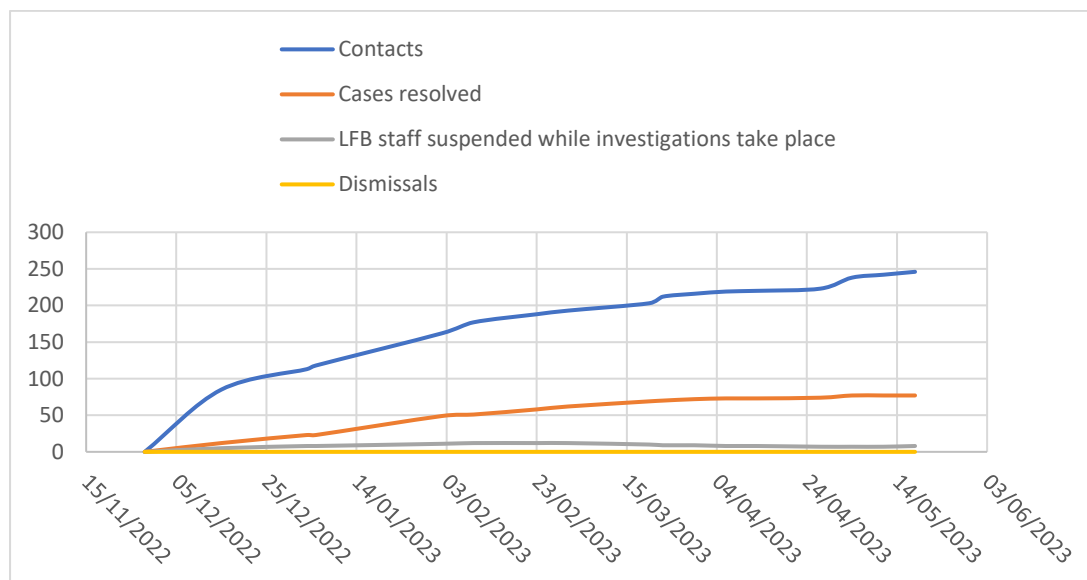
²⁹ <https://www.dailymail.co.uk/news/article-11478537/Home-Office-minister-Chris-Philp-slams-unacceptable-racism-sexism-London-Fire-Brigade.html>

³⁰ <https://www.theguardian.com/uk-news/2022/nov/26/london-fire-brigade-head-vows-change-after-damning-report>

³¹ <https://www.justiceinspectors.gov.uk/hmicfrs/news/news-feed/london-fire-brigade-moved-into-enhanced-monitoring/>

Afzal review. The data show up to May 18, 246 contacts were made to the service. It should be clarified that not every contact will amount to a complaint. 77 cases have been resolved. At the time of writing, just eight employees were suspended while being investigated for gross misconduct, down from twelve in February. To date, no one has been dismissed.³²

Figure 4. Cumulative frequencies of complaints made to LFB External Complaints Service



Source: LFB.

A Freedom of Information request was put to LFB to find out how many contacts made to the external complaints service related to racism, misogyny or sexism. In response LFB sent the data presented in the table below. As we can see, three per cent pertain to sexual harassment and a further three per cent to racial discrimination.

However, there may be more than meets the eye. For example, the category 'bullying' might contain examples of racial bullying. Nevertheless, as the numbers stand, they do not amount to evidence of an abundance of racist or misogynistic abuse within LFB.

Extrapolating, this would mean at least six contacts pertaining to sexual harassment and a further six of racial discrimination up to March 16. Just 16 per cent pertain to some form of discrimination, amounting to 32 contacts from a staff of over 6,000. Note that at this point, just 62 *actual* complaints had been registered.³³

(The data are presented using the classifications supplied by LFB which are imprecise and at times, the same thing is referred to by more than one category. Coaching refers to managers using the service to seek advice on how to proceed in cases that have come to their attention.)

³² <https://www.london-fire.gov.uk/about-us/independent-culture-review/external-complaints-service-for-staff/>

³³ FOI request.

Table 2. Classification of contacts made to London Fire Brigade up to March 16, 2023

Classification of contact	Percentage of contacts	Number
Bullying	27%	55
Bullying & harassment	23%	47
Discrimination	4%	8
Bullying, harassment, discrimination, victimisation	3%	6
Disability discrimination	3%	6
Sexual harassment	3%	6
Racial discrimination	3%	6
Rank/power disputes	3%	6
Historical grievance	8%	16
Coaching	23%	47

Source: LFB.

These data, at most 12 suspensions, zero dismissals to date, would imply that there are simply too few individuals possibly guilty of gross misconduct for one to speak of a general *de facto* rule of institutional racism or misogyny. It very much looks the case that we are talking about a few bad apples. The falling numbers of suspensions, along with zero dismissals, point to either exoneration or offences not grave enough to justify dismissal.

While the openness of LFB can be commended, publicising the number of contacts but not the actual number of complaints may lead to people mistakenly assuming their number to be much higher. Some will point to the number of contacts outweighing the number of resolutions as evidence of complaints not being addressed, as well as wrongly concluding the number of problems to be much greater than it actually is.

Since publication of the Afzal review, there has been a spread of the kinds of ideas that it represents across all fire brigades in the country. HMICFRS published a report titled 'Values and Culture in Fire and Rescue Services' in March.³⁴ It found allegations of 'bullying, harassment and discrimination in every fire and rescue service in England'. For reasons of space, this report cannot be critiqued in its entirety, but it does seem to rely on the same sorts of assumptions as the Afzal review. A series of undoubtedly troubling allegations pertaining to individuals is made, followed by ambiguous statistics that pertain loosely to

³⁴ <https://www.justiceinspectors.gov.uk/hmicfrs/publications/values-and-culture-in-fire-and-rescue-services/>

vague concepts – bullying, discrimination, and harassment – without much by way to state how typical such occurrences are.

Some of its recommendations may be sensible, including standardisation of vetting for new recruits, but largely it seems like an exercise in advancing ‘equality, diversity and inclusion’, as well as the ‘professionalisation of the fire service, including that ‘the Government should establish a College of Fire and Rescue’ and that ‘there should be no further delay to its implementation’. Here, HMICFRS is likely overstepping its remit into the realms of policy formulation, way beyond inspection of standards within police and fire services.

In any case, we have seen since the creation of the College of Policing, a collapse in policing and politicisation of police forces, while its insistence on greater ethical standards seems to have been a colossal failure.³⁵ The College of Policing was founded in 2012, and over 10 years later, the country’s largest police force has been found to have been harbouring criminals. Clearly, the creation of a so-called ‘college’ does nothing to improve standards of ethics or performance.

Official estimates put the cost of a College of Fire & Rescue at between £2.6- and £8 million per year of additional money once fully set up. Over ten years it is expected to cost £39 million, with a margin of error between £19.1- and £58.9 million given. It is admitted that such figures are ‘highly uncertain’ and that the actual 10-year spend may be as high as £77.8 million.³⁶ Separately, it is estimated such a College would employ 232 people.³⁷ The plans also entail up to £69,000 set aside for a new ‘oath’ to be read by all Fire and Rescue Authority employees, taking between one to five minutes.³⁸

Over 10 years, a figure of £39 million would purchase 111 new fire engines, or employ 1,056 new firefighters. It would also fund almost 100,000 crew-hours fighting fires.³⁹ While such a College is proposed on grounds that it would drive up standards through better training, it

³⁵ <https://www.civitas.org.uk/content/files/2633-C-We-Need-to-check-your-ppi-150-WEB-COPY.pdf>

³⁶

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1076244/20210510_HO392_Fire_Reform_White_Paper_Consultation_IA_FINAL_SIGNED_BY_LG.pdf

³⁷ The College of Policing employs 747 people as either direct employees or secondees. Estimates for the costs of the College of Fire & Rescue were arrived at by Home Office economists by multiplying the costs of the College of Policing by 31 per cent, this being the size of the Fire and Rescue Service as a proportion of the police. In a similar fashion, an estimate for staffing is arrived at. Figures are sourced from here:

<https://assets.college.police.uk/s3fs-public/2022-12/College-of-Policing-annual-report-and-accounts-2022-web.pdf>

³⁸

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1076244/20210510_HO392_Fire_Reform_White_Paper_Consultation_IA_FINAL_SIGNED_BY_LG.pdf

³⁹ According to Northamptonshire Fire & Rescue Service, a new fire engine costs £350,000.

<https://www.northantsfire.gov.uk/2022/05/17/new-engines-0522/#:~:text=The%20new%20fire%20engines%20%E2%80%93%20which,as%20well%20as%20public%20safety>

The average annual pay for firefighters up to watch manager level is £36,920 according to UCAS.

<https://www.ucas.com/careers-advice/employment/how-to-become-a/firefighter>

According to Humberside Fire & Rescue Service, the minimum call out charge for one fully-crewed fire engine is 393.75 per hour.

<https://humbersidefire.gov.uk/your-safety/unwanted-fire-signals/call-out-charges>

should be pointed out that both injuries sustained in the course of duty as well as in training and routine work, have fallen to recent lows.⁴⁰ Similarly, while response times are up, this is due to increases in time taken to drive to emergencies; crew turnout times (the time taken to leave the station) have fallen from an average of two minutes in 2009/10 to 1 minute 30 seconds in 2021/22.⁴¹ Improvements are being made without the need for further top-down direction. The proposal for a College of Fire & Rescue currently exists in a government White Paper as part of a batch of reforms.⁴²

HMICFRS sees itself as having a role in improving 'culture', without an awareness that this may entail politicised bureaucracy that comes to threaten the individual freedom to think and do as one pleases. At root of the politicisation of HMICFRS is perhaps to be found in the Public Sector Equality Duty of the Equality Act 2010. On its website, it is stated:

'Our purpose is to make equality and diversity considerations a routine part of everything we do, whether it is in relation to our role of inspecting police forces and FRs in the public interest, interactions and treatment of our staff, or holding forces to account.

*'As a listed body, HMICFRS will, within all our inspections, give consideration to inequality and, where identified, make recommendations to improve experiences in support of the Public Sector Equality Duty.'*⁴³

The problem is that no one really knows what 'equality' looks like or how to bring it about, so the bureaucratic measures keep piling up.

Ultimately, reviews such as Afzal's become largely political theatre, whereby the superficial appearance of robust methodology, followed by an authority figure to pronounce an institution as institutionally racist or misogynist, are all that are required for these to become *political facts*. All this is extremely difficult to say no to, given the media furore generated and the already tense relations between public services and some sections of the community. There follow-up large scale bureaucratic interventions that help build an infrastructure of identity politics within the institutions that makes way for divisive political ideologies, such as Critical Race Theory or modern 'anti-racism', as well as wasteful public spending, put at over £7 billion in sum across the public sector.⁴⁴

But consider the unintended consequences of this, whereby women and people of ethnic minorities fail to go for a job in occupations they are told are hostile to them. The report is often an exercise in the airing of grievances which may satisfy those making them, in most cases for undoubted wrongs, but when misconstrued in sum, damage the trust of all. (Note

⁴⁰ <https://www.gov.uk/government/statistics/fire-and-rescue-workforce-and-pensions-statistics-england-april-2020-to-march-2021/fire-and-rescue-workforce-and-pensions-statistics-england-april-2020-to-march-2021>

⁴¹ <https://www.gov.uk/government/statistics/detailed-analysis-of-response-times-to-fires-england-april-2021-to-march-2022/detailed-analysis-of-response-times-to-fires-attended-by-fire-and-rescue-services-england-april-2021-to-march-2022>

⁴² <https://www.gov.uk/government/consultations/reforming-our-fire-and-rescue-service>

⁴³ <https://www.justiceinspectors.gov.uk/hmicfrs/about-us/what-we-do/>

⁴⁴ https://www.conservativewayforward.com/files/ugd/acef4a_5b5ec1d9017f40b987a68110f70d276c.pdf

that MPs can then reference the Afzal review in order to justify such exuberant spending, for example on the BBC *Politics Live* programme.)⁴⁵

This report, like Macpherson in the police, is presented as a ‘watershed’, a pivotal moment in the great struggles against racism and misogyny; people beat their chests, make solemn attestations to their shame and shock, and pronounce their commitment to the cause of making things right. But you cannot be in a position of leadership and authority within LFB, accept a verdict of institutional racism and misogyny and profess you knew nothing about them.

The much-maligned Sewell Report, which its lead-author Tony Sewell described as not finding evidence of institutional racism,⁴⁶ was an attempt to move on from unevidenced dogmas. The counter-revolution seems to entail a new strategy of getting reports commissioned *within* public institutions to circumvent the new direction from central government.

Afzal’s review began with the tragic death by suicide of a young man. The report itself chimes with the ideas of vested interests and imagines a whole new way of doing HR in the LFB, only nothing has been done to evidence adequately the problem at hand, nor are any guarantees made of success. Writing this, I am left with the uneasy conclusion that the review serves to justify a power grab by what is a powerful political lobby within our institutions. An institution beset with problems common to any large-scale organisation that had procedures in place and plans to improve them, has been successfully hijacked by exploitation of the most damning anathemas there are today, namely the charges of institutional racism and misogyny.

⁴⁵ <https://order-order.com/2022/12/12/tim-loughton-clashes-with-zarah-sultana-over-woke-diversity-inclusion-spending/>

⁴⁶ <https://www.bbc.co.uk/newsround/56591022>

Dr Richard Norrie (director of the research and statistics programme, Civitas) conducts a forensic analysis of the recent Independent Culture Review of London Fire Brigade. That review was led by the former prosecutor Nazir Afzal, and reported ‘dangerous levels of ingrained prejudice against women and the barriers faced by people of colour spoke for themselves’. It claimed to find evidence that supports a finding that the London Fire Brigade is institutionally misogynist and racist.

Norrie finds the conclusions lacking, saying:

‘...the Afzal review proves on close inspection to be tendentious without having made its case. The charges of institutional racism and misogyny have not been substantiated by sufficient evidence. Mostly we have a series of anecdotes that are undoubtedly troubling but taken at face value and then construed as definitive. The authors do not appreciate that there are corrupt and incompetent doctors, but that is not sufficient to damn all doctors, say, or the NHS as a whole.’

This analysis looks at the methodology used to conclude that the London Fire Brigade is institutionally racist and misogynistic and draws very different conclusions. Dr Richard Norrie looks at the data used to come to these conclusions. Norrie concludes that these reviews have become ‘political theatre’.

Norrie takes aim at ‘the ideas of vested interests’ and leaves the reader in no doubt that ‘the review serves to justify a power grab by what is a powerful political lobby within our institutions.’