



LONDON FIRE BRIGADE

## Part 1: Equality Impact Assessment - author to complete (Draft)

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Before carrying out an Equality Impact Assessment (EIA), you should familiarise yourself with the guidance notes (see Appendix) and our other resources located within the [EIA section on Hotwire](#)

An EIA should be carried out whenever you are starting (or reviewing) any major activity (e.g. a new strategy, programme, or campaign).

### A. Name and the nature of the programme/ activity

Replacement and increase of emergency response driver (ERD) training cars.

### B. Reason for Equality Impact Assessment

Please delete as applicable:

- Proposed new programme/ activity
- Proposed change to an existing programme/ activity
- Undertaking a review of an existing programme/ activity
- Other (please state): Procurement of new vehicles for Driver Training

### C. Person responsible for the programme/ activity

Name: David Bracewell

Job title: Head of Training Operations

Department: Learning & Professional Development

### D. Equality and diversity considerations

Describe the ways in which the groups below may be impacted by your activity. There are some example questions below to aid your thinking (delete any that are not relevant):

**The purpose of an EIA is to give as much information as possible about potential equality impacts, risks or opportunities that your policy, activity or project may have on different groups of people.**

**This Equality Impact Assessment should demonstrate due regard for the provisions of the [Public Sector Equality Duty](#) by considering the following:**

1. identify possible negative impacts of decisions on individuals and groups with protected characteristics and plan mitigating action accordingly; and,
2. identify additional opportunities to advance equality within policies, strategies, and services.



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- Age (e.g. are their ways older or younger people may find it difficult to engage in your project or process?, are there young/old people who need support)
- Disability (do you need to consider large print or easy read of any surveys /questionnaires?)
- Race (including ethnicity and nationality) (does your project take into account the needs of people from different groups, if not do you need to make any adjustments?)
- Religion or belief (do people from faith groups experience any specific disadvantage in relation to your research project)
- Gender
- Sexual orientation (is your language inclusive of LGB groups?)
- Trans and non-binary – is your language inclusive of trans and non-binary people?
- People experiencing multiple needs such as homelessness, mental health problems, being involved in the criminal justice system or substance misuse.
- Pregnancy and maternity
- Social deprivation- e.g. people who may be prohibited from attending your event due to the cost of travel, people who live in deprived areas and homes which may be at risk, responsibility of the council (if the activity is in the community)

### E. Evidencing Impact

Please answer each of the following questions

- i. What information have you used to about the people who will be involved in or affected by your programme/ activity? (e.g. demographic info, scoping of need etc)
- ii. Explain any gaps in evidence/ insufficient information to properly assess the impact of your programme/ activity, and how will this be addressed? e.g. further research or working with a voluntary sector organisation?

Explain whether

- iii. Your programme/ activity disproportionately affects any group named above?

The procurement of new driver training vehicles does not disproportionately affect any groups named above.

Describe whether

- iv. This programme/ activity may potentially lead to discrimination (direct or indirect), harassment, victimisation, or less favourable treatment of people with protected characteristics?

This activity will not lead to discrimination (direct or indirect), harassment, victimisation, or less favourable treatment of people with protected characteristics?



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- v. Describe whether your Programme/ activity contribute to advancing equality of opportunity?

Staff may feel more inclined to become drivers based on a wider vehicle base that is being provided at more locations across London Fire Brigade.

- vi. Describes where there an opportunity for your programme/ activity to foster good relations between groups?

The Procurement of new vehicles does not have the ability to support the fostering of good relationships between groups.

- vii. Identify any reasonable adjustments to your programme/ activity to avoid discrimination or advance equality of opportunity?

London Fire Brigade are procuring both manual and automatic vehicles to support all driver training activities and the range of staff that will be attending the training.

- viii. How is the programme/ activity's communication made accessible to all groups?

Not applicable

- ix. How are you engaging people with a wide range of protected characteristics in the design, implementation and monitoring of the programme/ activity?

At present, there has not been engagement with staff that have protected characteristics based on there not being an impact to these groups.

#### **F. Sign-off**

**Name: David Bracewell**

**Rank/Grade: T/Group Commander**

**Date:**



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## Part 2: Inclusion team to complete - feedback and recommendations (Draft)

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### G. EIA Outcomes

Select one of the four options below to indicate next steps (Delete the options that do not apply):

**Recommendation 1:** No change required – the assessment is that the programme/ activity is/will be robust.

**Recommendation 2:** Adjust the programme/ activity – this involves taking steps to remove any barriers, to better advance equality and/or to foster good relations.

**Recommendation 3:** Continue the programme/ activity despite the potential for adverse impact with mitigation in place

**Recommendation 4:** Stop the programme/ activity as there are adverse effects which cannot be prevented/mitigated.

### H. Feedback

Please specify the actions required to implement the findings of this EIA and how the programme/ activity's equality impact will be monitored in the future. It may be helpful to complete the table.

### I. Review

Date of next review:



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## Part 3: Appendix - Equality Impact Assessment guidance (EIA)

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### Introduction

This guidance is intended to help you undertake an EIA and provide you with context as to why we are required to complete it. It is designed to lead you through the EIA process through asking pertinent questions and giving examples.

An EIA should be carried out whenever you are starting (or regularly reviewing) any major activity (e.g. a new strategy, programme, or campaign). For the purposes of this template, this is summarised as your 'programme/ activity'.

Completing an EIA is not in itself a legal requirement. However, it is an established and credible tool for us as public servants to use to demonstrate how we are helping the organisation meet its legal responsibilities under the Public Sector Equality Duty (PSED).

PSED is part of the wider Equality Act 2010 which specifies the following 'protected characteristics': age, disability, race (including ethnicity and nationality), religion or belief, sex, sexual orientation, gender reassignment, pregnancy and maternity, and marriage or civil partnership.

As a public body, LFB has duty to have due regard to:

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

The requirement is to actively consider how a programme/ activity will meet the general equality duty and take any necessary action.

### Step by step guide to completing Part One of the form

- 1. Purpose:** Before assessing the programme/ activity, ensure that you have a clear understanding of the purpose of the programme/ activity, the context, the intended beneficiaries, and the results aimed for.
- 2. Initial EIA:** In some circumstances - particularly for new policies/practices – there may be limited information on which to base EIA. In these cases, the EIA should be carried out to the extent possible and should identify arrangements for monitoring/ investigation of equality impact and for fuller EIA in future.
- 3. Full EIA: Assessing for impact:**
  - Bear in mind that the extent of EIA should be proportionate to the relevance of the programme/ activity to equality. It may not be practicable or necessary to answer every question or address every potential scenario.
  - Focus mainly on aspects of the programme/ activity that are most relevant to the question, to ensure most attention is given to the most important areas.



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- Relate answers to consideration of the available evidence and address any gaps or disparities revealed, where feasible without disproportionate effort. For new policies, assess potential impact.
- Describe any action identified to address any issues highlighted.
- Where you have identified there is potential for adverse impact, but the programme/ activity will still continue, you must provide a strong rationale for that decision.

### Section A

Indicate the current status of the programme/ activity or the stage of development/review. Also note any general comments here regarding the relevance and significance of the programme/ activity to equality (think about our duty under the Equality Act). Which aspects of the programme/ activity are particularly relevant (which should be the main focus for EIA)? On what aspects of equality may the programme/ activity potentially impact?

### Sections B, C and F

We hope are self-explanatory.

### Section D

Indicate which equality group/s the programme/ activity is relevant to and explain why? Policies/practices applying to substantial groups of service users or staff will be relevant to all equality groups, which should be noted.

The protected characteristics under the Equality Act are:

- Age
- Disability
- race (including ethnicity and nationality)
- religion or belief
- sex (or gender)
- sexual orientation
- gender reassignment
- pregnancy and maternity
- marriage or civil partnership<sup>1</sup>

As part of your assessment, consider diversity within, as well as between groups (e.g. different disabilities, different racial groups). Consider the implications of combinations of protected characteristics e.g. issues of relevance to women may vary once race, religion and age are taken into account. Also consider the impact on those with caring/family responsibilities (which tends to impact more on women).

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<sup>1</sup> Note: only the duty to eliminate discrimination applies to marriage and civil partnership. There is no need to have regard to advancing equality or opportunity or fostering good relations in this respect.



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## Section E

- i. **What evidence is available about the needs of relevant equality groups?** e.g. information/feedback from equality staff groups or other stakeholders (including those in the community), HR equality monitoring data, organisational data, staff surveys, research reports, demographic information, audit, inspection or management reports and recommendations.
- ii. **Where are the gaps in evidence?** If there is insufficient information to properly assess the programme/ activity, how will this be addressed? If information cannot be gathered now, consider building monitoring into the plans for implementation/review of the programme/ activity. Note: the resources put into collecting evidence should be proportionate to the programme/ activity.
- iii. **Is there evidence (or an expectation) of higher or lower uptake by any equality group(s)?** If so, give details of the differences and the reasons for these (if known)? Is any equality group excluded from participating in or accessing the service or functions? If so, explain why this may be? Does the programme/ activity create any barriers for any group? For example, because of the time when the service is delivered or because of restricted income?
- iv. **Might the application of this programme/ activity lead to discrimination, harassment or victimisation?** Might it result in less favourable treatment for particular equality groups or give rise to indirect discrimination?
- v. **Does the programme/ activity contribute to advancing equality of opportunity?**<sup>2</sup> Will it help to:
  - remove or minimise disadvantage?
  - meet the needs of different equality groups?
  - encourage increased participation of particular groups?
  - take account of disabled people's impairments?
- vi. **Is there an opportunity in applying this programme/ activity to foster good relations between people in any protected group and those who are not?**<sup>3</sup> Will it help to tackle prejudice and/or promote understanding?
- vii. **Are reasonable adjustments built in where they may be needed?** Is there evidence (or an expectation) that people from different equality groups have different needs or experiences in relation to the programme/ activity? If so, what are they?
- viii. **Is the communication of the programme/ activity accessible to all groups?** Are you using channels that are accessible to everybody? How could you make sure that your messages reach the widest range of people?

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<sup>2</sup> This question does not apply to the protected characteristic of marriage or civil partnership

<sup>3</sup> This question does not apply to the protected characteristic of marriage or civil partnership



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- ix. **How are relevant equality groups or communities involved in the development, review, and/or monitoring of the programme/ activity?** Have you sought feedback from groups that may be the most impacted by the programme/ activity?

#### 4. Understanding the feedback provided in Part Two of the form

##### Section G

There is a legal obligation to take account of the results of the EIA in the development of a new or revised programme/ activity. This requires considering taking action to address any issues identified, such as removing or mitigating any negative impacts, where possible, and exploiting any potential for positive impact.

Clearly any unlawful discrimination must be eliminated.

Having considered all of the sections of the EIA form the Inclusion team will assess how the development/review of the programme/ activity should be progressed and make one of the following recommendations.

- **Option 1:** No change required – the assessment is that the programme/ activity is/will be robust. There is no evidence of potentially unlawful discrimination and all reasonable opportunities to advance equality and foster good relations have been taken, subject to continuing monitoring and review.
- **Option 2:** Adjust the programme/ activity – this involves taking steps to remove any barriers, to better advance equality and/or to foster good relations. This may involve removing or changing the aspect of the programme/ activity that creates any negative or unwanted impact. It may also involve introducing additional measures to reduce or mitigate any potential negative impact.
- **Option 3:** Continue the programme/ activity – this means adopting/continuing with the programme/ activity despite the potential for adverse impact. Set out the rationale for this decision, including how the decision is compatible with our legal obligation. Where there is discrimination, but it is considered not to be unlawful – the objective justification must be recorded.
- **Option 4:** Stop the programme/ activity – if there would otherwise be unlawful discrimination or adverse effects that are not justified and cannot be prevented/mitigated.

##### Section H

The inclusion team will provide specific feedback regarding any actions required to implement the findings of your EIA.

Some policies/practices may be viewed as having only positive equality impact. For these, consideration should still be given to ensure that no adverse impact is overlooked and to ensure that



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full advantage is taken of the positive impact, e.g. through effective communication. However, the effort involved in carrying out EIA should not be excessive.

#### Section I

The Inclusion team will advise you of any required review or monitoring activities.