

Equality Impact Assessment

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 new activity/programme/policy/project/strategy/campaign *, or where you propose changes or a review of the previous one.

*In this document, any kind of activity/programme/policy/project will be called an ACTIVITY for an easy read, while you specify the type of your event from your end.

The purpose of an EIA is to meet and justify the legal obligation required under the [Public Sector Equality Duty](#) (PSED), namely, the ‘DUE REGARD’ that documents that your activity/programme/policy will:

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

In the EIA, you need to show that your activity meets the 3 conditions of the due regard, as listed above, and provide any relevant information showing that your activity caters for people with protected characteristics (where applicable), but also that it promotes equality and eliminates potential discrimination and offers additional opportunities to advance equality.

Where you identified any possible negative impacts on individuals and groups with protected characteristics, you need to complete a mitigating action plan (Section F below). After your mitigating action plan has been implemented, you need to inform the EAI Team by sending the same form again with the notification of the date when the mitigation action plan was completed.

A. Name, goal, and the expected outcomes of the programme/ activity

Competency Framework Project

The project is to implement a Competency Framework as one workstream of the Organisational Learning and Professional Development Strategy (2022-24), which is looking at ways to improve learner journeys of staff. There is currently no existing standardised or structured system in place to support staff and managers. As such, there has not been a consistent approach to how learning is managed organisationally and therefore has resulted in learning events not being effectively identified, recorded, assured, evaluated, and assessed. The Competency Framework will provide the information staff need to acquire, maintain, and develop

their necessary skills behaviours and capabilities, to competently fulfil their role.

This project will deliver the competency framework via an IT solution, enabling the workforce (initially FF-StnO) to see at a glance from a personal dashboard what skills/knowledge/attributes they need to ensure they are competent for their role and maintain that competency.

Implementation will begin with operational risk-based core skills. Individuals will be able to access from one log-in account their personal profile. The dashboard will provide a visual interface, with appropriate RAG indicators for maintenance of competence.

In line with the CRMP (2023-29) Commitment– Staff will be equipped with the right skills and career development opportunities to serve you better.

- Staff will know they are doing the right training, to do their jobs safely, confidently and to the standard expected of them by the brigade.
- Line managers will have the correct information to assess individuals' competence and be able to effectively support in their training progress.
- Staff will be able to take accountability for their own learning.

B. Reason for Equality Impact Assessment

Please delete as applicable:

- New activity

C. Names of the team responsible for the programme/ activity

Responsibility for the EIA:

Name: Angela Hale

Job title: Head of Training Change

Department: Learning and Professional Development

Responsibility for the whole activity:

Name: Angela Hale

Job title: Head of Training Change

Department: Learning and Professional Development

D. Who is this activity for, who is impacted by it (all LFB staff, specific department, external communities)

The project relates to all staff, regardless of group or protected characteristic.

E. What other policies/documents are relevant to this EIA?

- Organisational Learning & Development Strategy 2022-2024
- Your London Fire Brigade 2023-2029
- Togetherness Strategy – pillar 2
- [Accessible Communication Guide](#)
- [Inclusive Communication Toolkit](#) (Business Disability Forum)

F. Equality and diversity considerations

Describe the ways how your activity meets the conditions of the due regard of the PSED and how LFB employees and communities of London may be affected by your activity, especially those ones with protected characteristics. Explain whether your programme/ activity may disproportionately affect any group named below?

Protected characteristics Equality Act 2010:

- Age
- Disability/Barrier
- Gender and gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race including ethnicity and nationality
- Religion or belief
- Sexual orientation
- Socio-economic backgrounds
- Caring responsibilities

Do not provide databases, graphs, or tables in this Section, just key findings and the outcomes of your learning about these different groups. For detailed evidence and lists of data used, use Section E 1.

Having a standardised system which displays individual competency within an organisational competency framework will promote equality in the brigade, as staff will have consistent up-to date skills information and be afforded the opportunity to effectively progress their learning journey. The system will improve the capability of TNAs and understanding of the development needs across the workforce. We anticipate therefore a positive impact on protected groups with improved access to professional development across the workforce and driving up the quality and delivery of individual learning, as “a ‘one-size-fits-all ‘approach is neither suitable, nor desirable.” (Organisational Learning and Professional Development Strategy).

The identification of potential negative impact, as specified below, is around implementing a new IT system, and will be addressed as a digital platform is developed and or during the tendering process and staff training.

- Age.

There could be an initial negative impact on older staff members, with the

anticipation/introduction of new software, with the tendency to less proficiency with computer technology than younger staff. But mitigating this will be a system providing an alternative to more complex data reporting (e.g., Power BI reports that may take several steps plus filtering data, on SharePoint, which staff express can be difficult to navigate and search). The system will have a positive impact for all age groups covering different learning styles. The system will use familiar navigation, language and appearance that are already use. It will also improve/simplify their experience by providing one place to access training records rather than having to search through several different systems to find what they need. Training will be provided for all staff. There will be an expected change in the age demographic of the brigade following the pension remedy.

- Disability

There could potentially be a negative impact on people with neurodiversity in the user experience of the system. The following principles will be considered during the research and development stage to ensure they are available to users:

- Not too many steps to access information
- Background colour / font size and colours
- Compatibility with Assistive Technology
- Ensuring staff have the software they need
- Plain English / straight forward language used (standard Brigade terms used)
- Simple navigation
- Accessible user guide
- web accessibility tools

The impact will be positive for people returning from long term sickness, as they will have immediate access to their training and learning records, to support with what training is required to return to operational duties. Their records can be utilised as part of keeping in touch (KIT) days to prepare staff for coming back to work and consider any missed learning events.

- Race (including ethnicity and nationality) The competency framework will be applied equally to all employees regardless of race. We believe there will be a neutral impact on this protected characteristic. Training support of the system being available for those for whom English is not their first language can be addressed on an individual basis, with guidance sought from the Equalities Team.
- Religion or belief. The competency framework will be applied equally to all employees regardless of religion or belief. We believe there will be a neutral impact on this protected characteristic.
- Gender and gender reassignment. The competency framework will be applied equally to all employees regardless of gender. We believe there will be a neutral impact on this protected characteristic.
- Sexual orientation The competency framework will be applied equally to all

employees regardless of sexual orientation. We believe there will be a neutral impact on this protected characteristic.

- **Pregnancy and maternity.** There will be a positive impact as staff will have immediate access to their training and learning records, with visual indicators of skills gaps, out of ticket training, to support with what training is required to return to operational duties. Their records can be utilised as part of keeping in touch (KIT) days to prepare staff for coming back to work and consider any missed learning events.
- **Socio-economic backgrounds -** The competency framework will be applied equally to all employees regardless of sexual orientation. We believe there will be a neutral impact on this protected characteristic.
- **Caring Responsibilities -** There will be a positive impact as staff will have immediate access to their training and learning records, with visual indicators of skills gaps, out of ticket training, to support with what training is required to support time management. Their records can be utilised as part of management support, individual management of training and organising training around caring responsibilities.

G. Evidencing Impact

Please answer the following six questions:

- 1. How have you gathered and utilised information from various sources, including consultations with individuals, wider research, and resources from the EIA website, to comprehensively understand the people involved in or impacted by the activity, particularly those with protected characteristics?**

Input from the Learning Support team has been used to inform the kinds technology considerations when introducing a new digital platform. LFB resource on Accessible information will be used to inform all communications and training materials. Feedback from Neurodiverse Support Group and various user groups (we plan for user groups from Fire Stations in the initial phase of delivery) during development stage and will also support continuous improvement of the system. [Current LFB Equalities Data on staff age groups (March 2024) approx. 14% of LFB are 50-54, with 50% reduction within each 10yr range.]

- 2. Are there any gaps in evidence for assessing your activity's impact, and if so, can you justify proceeding with the EIA without addressing them or are you considering a mitigation action plan?**

There are no gaps in evidence that will require a mitigation action plan. Future development of an IT system either internally or via external procurement will include further EI assessment.

3. What adjustments have you considered for people with protected characteristics? How does your activity promote equality of opportunity and caters for equity?

Adjustments will be applied as detailed above in relation to using a digital platform. The project will provide consistency of personal skills and competency data that is automated to a personal dashboard

4. How does your activity foster positive relations promoting equality between different groups, and what specific examples facilitates this interaction, highlighting the benefits for individuals with protected characteristics?

The project will provide an opportunity to monitor and implement fairness in the learner journey and equality in supporting a competent workforce across all groups. The project will provide access to more accurate training data, enabling staff and management to address training needs appropriately. Skills Gap analysis feeds into the project so will support maintenance of competency for all staff groups.

5. How do you communicate the activity to those involved, especially with protected characteristics, and have you considered diverse formats such as audio, large print, easy read, and other accessibility options in various materials?

Communication around preparing for implementation of the project will be done in consultation with the Comms team to ensure it is available on Hotwire in accessible formats. The delivery of the project, being an IT system, will require instruction in how to use and navigate via streamed and in-person demonstration, Teams share screen activities and visual diagrams and flow charts to support training. Video will be an option, and feedback from staff user groups prior to the system being live.

6. List all the internal/external stakeholders contacted in relation to this activity. What information did you get from these?

Learning Support – confirmation of the accessibility consideration of a new data platform.
ICT will be a major source of advice on system requirements that mitigate age related impacts, and on experience drawn from Training Change following the Appraisal system development.

H. Mitigating action plan (where an adverse impact has been identified, please record the steps that are being taken to mitigate or justify it?)

Protected characteristic and potential adverse impact	Action being taken to mitigate or justify	Lead person/department responsible for the mitigating action
1. Age related IT skills	A reporting system that provides familiar navigation, language and appearance that are already use. Easy one place to access training records. Training will be provided for all staff, with ongoing support and guidance.	ICT / Training Change
2.		
3.		
4.		

I. Signed by the Submitter

Name: Kate Keane

Rank/Grade: FRS D

Date: 15/01/24

Part 2: Inclusion team to complete - feedback and recommendations

J. EIA Outcomes

Select one of the four options below to indicate next steps:

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

Recommendation 2: Continue and correct the activity accordingly following our feedback – this involves taking steps to remove any barriers to better advance equality and/or to foster good relations.

Recommendation 3: You must complete the mitigation action plan and continue the activity despite the potential for adverse impact with mitigation in place.

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

K. 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.

Recommendation 1: No change required – the activity is robust.

Competency Framework - the EIA led to Recommendation 1, indicating that no changes are necessary due to the anticipated robustness of the activity. Some feedback has been provided, so please take these into consideration.

Future recommendation:

Utilise Hotwire resources library for Equality, Diversity, and Inclusion updates. This repository provides valuable information on data and supporting charities.

Link: [Equality, Diversity and Inclusion Resources](#)

L. Sign off by EIA Inclusion team

Date: 23/01/2024