



LONDON FIRE BRIGADE

Part 1: Equality Impact Assessment – submitter to complete

Before carrying out an Equality Impact Assessment (EIA), you should familiarise yourself with the guidance notes 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 H 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

Light Vehicles Life Replacement Programme. This paper identifies the current issues in driving combustion engine motor vehicles within London, and the associated polluting tailpipe emissions that are harmful to people and the environment. The Mayor of London has tasked LFB with becoming carbon zero by 2030, which LFC is working toward within the vehicle replacement programme. The only difference to the existing vans and cars on the fleet to the proposed new vehicles is that the new vehicles will have electric motors instead of internal



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combustion engines.

B. Reason for Equality Impact Assessment

Please delete as applicable:

- Proposed changes to an existing activity

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

Responsibility for the EIA:

Name: Vic Macias
Job title: Head of FLEET
Department: Property & TSS

Name: Zoe Nicholls
Job title: Capital Projects Co-ordinator
Department: Property & TSS

Responsibility for the whole activity:

Name: Mark Davidson
Job title: Deputy Assistant Commissioner
Department: Property & TSS

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

LFB staff, in particular this activity impacts Operational Staff and FRS staff who would use these vehicles to undertake their duties.

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

[Public Sector Equality Duty](#)

[Equality Act 2010](#)

[Your London Fire Brigade – Our plan for 2023-2029 \(CRMP\)](#)

[LFB Values](#)



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[Grey Book](#)

[People Services Strategy](#)

[Policy No. 973 Togetherness policy](#)

[Protected characteristics resource library](#)

[Policy No. 370 Policies and procedures guidance](#)

[Policy No.290 Translation and interpretation](#)

[Inclusive and accessible documents for neurodivergent individuals](#) – tips and resources 2024

[LFB key EDI terminology HRE36 Meeting the religious, spiritual and pastoral care needs of staff](#) [Role to rank collective agreement 2019](#)

[Policy No. 1005 Supporting health and wellbeing](#)

[Policy No. 323 Trans inclusion policy](#)

[Policy No. 555 Family support leave \(including maternity\) policy](#)

[Policy No. 313 Maternity provisions – breast feeding policy](#)

[Policy No. 969 Menopause policy](#)

[Policy No. 448 Working with choice – flexible working options policy](#)

[Policy No. 813 Driving Brigade Vehicles NOG](#)

[Policy No. 788 Electronic Personal Record File \(E-prf\) policy](#) [Policy](#)

[No. 965 – Equality support groups](#)

[Policy No. 860 Unit 9 of the Firefighter role map \(FF9\)](#)

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?



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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

Also considering:

- Caring responsibilities
- Socio-economic backgrounds

At the end of your explanation, please, list the sources you have used.

Age

The majority of staff are between the 30 – 49 age ranges (68%) with 18% between 50 – 59 and 1% aged 60 and over, and 12% under 29 across all staffing groups.

There is a legal minimum age requirement to drive a light motor vehicle along with the minimum age of joining the Fire and Rescue Service is 18 there is no restrictions.

Having no age restrictions promotes good relations between the age ranges providing opportunity for access with no restrictions together. This means that all staff across all ranks have access to these provisions.

Disability/Barrier

The total percentage of staff across all staffing groups who have self-declared as having a disability is 8% with 4% either preferring not to say or have not provided their information.

The training offered is consistent with the training already received as this is just replacing their current vehicles. This will have no direct barriers for those staff who have declared a disability (8%) and will be in line with the PN1005 Supporting health and wellbeing policy so that workplace adjustments can be considered/provided as well as recorded on the new workplace adjustment passport to enable access. This eliminates discrimination and provides advancement of opportunity for those with a disability (8.%) and those within this protected characteristic group to access these provisions. This in turn means that those within this protected characteristic and those without have access to these provisions and support, together fostering good relations.

Policy No. 860 Unit 9 of the Firefighter role map (FF9) sets alternative to driving within this policy provides a direct reasonable adjustment for this protected

characteristic group.

Gender and gender reassignment

The gender breakdown of staff is 11% female and 89% male as a total across all staffing groups. The LFB does not currently record EDI staff data for gender reassignment but for the purposes of this EIA, it has been considered there are staff in this group within the workforce across all staffing areas.

The vehicles offered has no gender restrictions between the mix of genders so eliminates discrimination and provides advancement of opportunity for those in the female minority. Having no gender restrictions promotes good relations between the genders provides access to these provisions together. Support is available through this policies provisions and PN1005 Supporting health and wellbeing policy. The vehicles come with user manuals to adjust the seats and mirrors to accommodate different body types

The LFB does have staff who have and are transitioning and the PN323 Trans Inclusion policy has been applied within these provisions and there are no barriers identified that cannot be managed within PN323 and PN1005 when applied to this. Line managers will be guided on what reasonable adjustment can be put in place by our Occupational Health Service (OHS) who provides a range of support including access to occupational health physicians (doctors), occupational health advisers (physiotherapists), nurses, Wellperson screenings, functional restoration programmes and post incident support.

Marriage and civil partnership

The LFB does not currently record EDI staff data for marriage and civil partnership but for the purposes of this EIA, it has been considered there are staff married and in a civil partnership within the workforce across all staffing groups.

The vehicles offered has no restrictions for those with these characteristics and those who do not so eliminates discrimination and provides advancement of opportunity for those that do by having access. Having no restrictions promotes good relations between those that are married, in civil partnerships and those who are not by providing access to these provisions together.

Pregnancy and maternity

The LFB does not currently record EDI staff data for pregnancy and maternity but for the purposes of this EIA, it has been considered there are/have been staff pregnant and/or on maternity within the workforce across all staffing groups.



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Reasonable adjustments will be made locally if required by line managers who will be guided by the policies in place. This can be managed via the vehicle modification process where Babcock, or a third-party vehicle converter can modify vehicles to meet required specifications. LFB provide a modification request in writing, and Babcock are tasked with its completion.

The vehicles offered has no restrictions for those with these characteristics and those who do not so eliminates discrimination and provides advancement of opportunity for those that do by having access. Having no restrictions promotes good relations between those that are pregnant, absent on maternity leave or returned from maternity leave, and those who are not by providing access to these provisions applied together. Support is available within this policy as well as PN1005 for this protected group.

Policy No. 860 Unit 9 of the Firefighter role map (FF9) sets alternative to driving within this policy provides a direct reasonable adjustment for this protected characteristic group.

Race including ethnicity and nationality

The breakdown of staff race and ethnicity is 16% Black, Asian and minority ethnic and 80% white with 4% preferring not to say or not providing information. The LFB does not record EDI staff data for nationality but for the purposes of this EIA, this has been considered within the workforce across all staffing groups.

The vehicles offered has no race/ethnicity/nationality restrictions across any of these characteristics so eliminates discrimination and provides advancement of opportunity for those groups within the minority by having access. Having no restrictions promotes good relations between the staff and their different races, ethnicities and nationalities providing access to these provisions together.

Religion or belief

The majority of staff are recorded as no religion at 40% with Christian recorded as the highest percentage at 31%. Other is 3%, Muslim 2% and Jewish, Buddhist, Sikh, Hindu at 1% with 20% either not providing their information or preferring not to say. These are the totals across all staffing groups within the workforce.

The vehicles offered has no religion or belief restrictions across any of these characteristics so eliminates discrimination and provides advancement of opportunity for those groups within the minorities by having access. Having no restrictions promotes good relations between the staff and their different races, ethnicities and nationalities providing access to these provisions together.

Sexual orientation



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There is 6% of the workforce across all staffing groups recorded as LGB with 24% preferring not to say or not providing the information. The data refers to LGB.

The vehicles offered has no sexual orientation restrictions for the 6% of the workforce recorded as LGB so eliminates discrimination and provides advancement of opportunity for those in this minority of the workforce. Having no sexual orientation restrictions promotes good relations between the genders providing access to these provisions together.

Socio-economic backgrounds

The LFB does not currently record EDI staff data for socio-economic backgrounds but for the purposes of this EIA, this has been considered within the workforce across all staffing groups.

The vehicles offered have been sourced with PN973 Togetherness policy in mind and does not create barriers because they are standard, automatic transmission vehicles that can be used by all employees with a manual or automatic Full UK driving license, capturing the widest selection of staff possible. There are no restrictions such as pre-required qualifications and the provisions are communicated using inclusive language so that they are clear. The provisions facilitate staff with various socio-economic backgrounds to interact in line with PN973 positively.

Sources

[EIA - Equalities Data Summary by occupational group LFB LIVE](#)
[Key data sources](#)

G. Evidencing Impact

Please answer the following four questions:

G1.

a. List all the internal/external stakeholders and organisations you have consulted or contacted regarding your activity, along with the insights gained from these interactions?

b. Explain how you have gained and evaluated your insights and whether you intend to conduct a follow-up or seek post-activity feedback from those stakeholders?

OP&A

Central Operations

Commissioners Office

Vehicle users

The FLEET workstream lead for vans sent out the User Requirement document to



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all van users who then provided detail of the vehicle usage, the mileage, and the location it is kept overnight. In most cases the vehicles did not have high mileage and were kept at Brigade premises overnight. With the move to electric, because the mileage of vehicles is not very high, it is anticipated that there will be minimal change in the way staff are currently working.

FLEET have advised that charging the vehicles is to be planned more efficiently, and the vehicle must be charged the night before to prepare for the day ahead, and that if the vehicle is pushing the limits of the available mileage, staff can charge the vehicle at Brigade change points or one of the many public charge points available in and around London. This can be considered a break from driving which is advisable anyway. Staff have been assured that given the current low mileage the vehicles are doing, the move to electric will not have a negative impact, and the vehicles may prove easier to drive.

FLEET data will be recorded at the 13-week Babcock service intervals. The vehicle users will have the support of the workstream lead during and after the replacement, and their feedback will be recorded for the next life replacement round (in five years for cars, and seven years for vans).

G2. Have you faced 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?

The LFB does not currently monitor staff data in relation to nationality, gender reassignment, marriage, civil partnerships, caring responsibilities or socio-domestic backgrounds.

G3. What adjustments have you considered for people with protected characteristics, and how does your activity promote equality of opportunity and caters for equity for them?

Disability:

The paper is supported by LFB policies regarding individual personal adjustments, such as PN553 Learning support.

This project is in line with the PN1005 Supporting health and wellbeing policy so that workplace adjustments can be considered/provided as well as recorded on the new workplace adjustment passport to enable access.

Line managers would be guided and advised on reasonable adjustments for driving Brigade vehicles by Our Occupational Health Service (OHS) who provide a range of support including access to occupational health physicians (doctors), occupational health advisers (physiotherapists), nurses, Wellperson screenings, functional restoration programmes and post incident support.

G4. 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?

The Light Vehicles Life Replacement Programme paper has been produced in line with the LFB's policy standards on writing policies using the 'Key EDI terminology' and accessible communication guidance ([2425305963Inclusive and Accessible Documents for Neurodivergent](#)). It is self-service accessible both internally and externally, and available in a range of diverse formats in line with the Communications policy PN290 (customer service level 0).

Training Helpdesk is available for staff to contact for advice and support in the provision of training.

An HR Helpdesk is available for all staff to contact for advice and support (customer service level 1) as well HR staff available to meet with staff to explain policy provisions (customer service level 2). The LFBs specialist HR Inclusion team is also available to provide specialist advice relating to protected characteristics (customer service level 3).

This ease of accessibility supports the People Services strategic priority of 'creating a positive and inclusive culture' to achieve its aim of enabling our people to be the best that they can be to serve its people and the communities in line with the LFB delivery plan 2023-2029.

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
N/A	N/A	N/A

I. Signed by the Submitter

Name: Vic Macias

Rank/Grade: FRS G

Date: 09/08/2024



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Part 2: Inclusion team to complete - feedback and recommendations

J. EIA Outcomes

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

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.

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 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.

For the Vehicles Life Replacement Programme, the EIA led to Recommendation 2, while no changes are necessary due to the robust equality considerations mentioned, we note that actions have been outlined by the submitter to ensure the equitable engagement of those with protected characteristics. These actions will be reviewed in six months to ensure alignment with the legal requirements of the PSED.

For future EIA submission:

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: 15/08/2024