

Firefighter Development Team

Report to:

Investment Finance Board
Commissioner's Board
Deputy Mayor's Fire Board
London Fire Commissioner

Date:

25 July 2024
9 October 2024
22 October 2024

Report by:

Keeley Foster, Assistant Commissioner Learning and Professional Development

Report classification:

For decision

For publication

PART ONE

Non-confidential facts and advice to the decision-maker

Executive Summary

This report seeks the approval to establish the dedicated Firefighter Development (FFD) team.

Recommended decisions

For the London Fire Commissioner

That the London Fire Commissioner approves the implementation of the new LFB Firefighter Development Team and costs associated with staff training, operational equipment and property costs and to commit revenue expenditure of £2,346,741 in 2024-25, £2,473,431 in 2025-26 and £1,987,974 annually in future years for the creation of the new LFB Firefighter Development Team.

1 Introduction and background

- 1.1** Following concerns raised regarding the number of trainee firefighters (TFF) who had either resigned or been re-coursed (recognised as a corporate risk on London Fire Brigade's (LFB's) risk register) and in response to an action plan produced following the tragic death of Firefighter Jaden-Matthew Francois-Esprit, the LFB sought to introduce measures to improve the Firefighter Development (FFD) training programme.
- 1.2** In April 2024, the FFD programme was increased from a 13 to a 15-week training course with the addition of two weeks being dedicated to the transition of TFF's from training and onto an operational fire station.
- 1.3** For the first time since the training contract with Babcock Training Limited (BTL) was implemented, a 'one team' approach was to be introduced with LFB training staff, delivering FFD training both independently and jointly with BTL trainers.
- 1.4** The new 15-week FFD training programme now consists of four weeks delivered by LFB staff (two pre and two post the 11-week BTL led weeks) and 11 weeks delivered by BTL.
- 1.5** Additionally, a new and dedicated FFD team was included as part of the LFB budget for 2024/25 which would be responsible for delivering FFD improvements. This included welfare support specifically designed to address the LFB corporate risk and recommendations arising from the Jaden-Matthew Francois Esprit action plan.
- 1.6** Based on the current FFD training throughput, the LFB has over 400 TFF/FFD's actively enrolled on the Level 3 Firefighter Apprenticeship programme.

2 Team structure to deliver FFD improvements

- 2.1 As part of LFB's 2024/25 budget setting process an investment bid was submitted and approved which set out the benefits that were expected as well as a structure and establishment initially expected to deliver these benefits.
- 2.2 Following the budget submission the structure was reviewed and amended to best deliver against the benefits, control measures, actions required and the expected annual throughput forecast across the next three training years. An updated structure and establishment can therefore be found at Appendix 1 including a further revised structures for 2025/26 and 2026/27 where it is forecast that the FFD throughput will significantly reduce as detailed below in paragraph 2.3.
- 2.3 People services, continually review the establishment impact resulting from the pension remedy and are forecasting a requirement to recruit and train 264 Apprentices for both 2024/25 and 2025/26, followed by 154 Apprentices in 2026/27. This would result in a reduction in the requirement for FFD courses and the FFD team establishment has been updated to reflect this reduced requirement.
- 2.4 In order to achieve the FFD throughput required as set out above, LFB must train above this number to take into account the current and projected re-coursing rates. Training capacity for FFD is a maximum of 300 Apprentices across a 12-month period (25 courses of 12 delegates). This is based on the current structure of the FFD training course.
- 2.5 By committing to the expenditure of £2,346,741 in 2024-25, £2,473,431 in 2025-26 and £1,987,974 annually in future years annually this will provide the dedicated FFD team structure, to deliver against the control measures required to support reducing the P1 corporate risk. It will deliver current competent LFB staff delivering training alongside Babcock to increase the support given to our Apprentices, provide a team who can support Apprentices and station staff when they finish their initial acquisition training as well as a dedicated quality assurance team who will seek to proactively continually improve the FFD course taking into account national trends and ensure the course is being delivered to LFB expectations.
- 2.6 The FFD team structure consists of an FFD Delivery team, FFD Operations Team, FFD Welfare and Support team and FFD Continuous Improvement and Quality Assurance team.
- 2.7 The FFD Continuous Improvement and Quality Assurance team will initially be in addition to the Learning and Professional Development (L&PD) Training and Assurance Team however the two teams will work closely together ensuring a joined up approach to assurance is maintained. Due to the complexities and number of business critical areas needing to be focussed on within FFD, it was felt that having a dedicated FFD team at these early stages, to initially focus on quality control followed by a move into quality assurance, would be beneficial. However, the medium to long term aim will be for this team and associated funding to move across to the L&PD Training and Assurance Team, once the quality control aspect of the teams responsibilities has reached a position whereby it is agreed that the dedicated team are no longer required.
- 2.8 The FFD team establishment for 2024/25 consists of a total of 35 positions, reducing to 34 in 2025/26 and 27 in 2026/27 when the training requirement reduces: Within the FFD team, there are three existing posts (FRS E FFD Operations Manager and 2x FRS D FFD Operations Lead) which are already funded and, therefore, do not require additional funding although they are reflected within the 'New FTE' column in the table

of paragraph 2.9 to reflect the overall team size. There is a slight increase in costs for the posts which reflect one FRS D post moving from a 0.8 FTE to a 1 FTE and the FRS E post receiving a special responsibility allowance (SRA).

- 2.9** There will be staff training costs associated with the new FFD team structure as well as costs to acquire operational equipment and make property changes to the existing estate. Included within the FFD team budget is one off expenditure of £100,000 for staff training and £100,000 equipment and property costs.

FFD Implementation Team 2024/25 - 2025/26									
			Values						
Type	Role	Grade	'New FTE	'Total 2024/25	'New FTE	'Total 2025/26	'New FTE	'Total 2026/27	
Ops	Firefighter Assurance support	Firefighter	1	72,060	1	74,618	1	75,973	
	Firefighter Delivery Team	Firefighter	13	740,271	13	970,029	9	683,756	
	Firefighter ESG Lead	Firefighter	1	72,060	1	74,618	1	75,973	
	Firefighter Welfare support	Firefighter	2	144,120	1	81,475	1	82,830	
	Head of Firefighter Development	Group Commander	1	128,726	1	133,429	1	136,008	
	Leading Firefighter Assurance Officer	Leading Firefighter	1	57,382	1	78,230	1	79,746	
	Leading Firefighter Delivery Team	Leading Firefighter	1	64,108	1	78,230	1	79,746	
	LFB FFD Officer	Firefighter	3	216,180	3	223,853	0	0	
	Sub Officer Delivery Team	Sub Officer	1	76,669	1	79,534	1	81,125	
	Station Commander	Station Commander	2	215,247	2	223,272	2	227,737	
	Station Officer Delivery Team	Station Officer	1	79,061	1	89,701	1	91,432	
	Station Officer Quality Assurance Officer	Station Officer	1	65,804	1	89,701	1	91,432	
	FFD Admin Support	FRS C	1	7,603	1	48,000	1	48,960	
	FFD Continuous Improvement and Quality Assurance Manager	FRS F	1	80,113	1	83,106	1	84,768	
FRS	FFD Operations Lead	FRS D	2	965	2	11,592	2	11,824	
	FFD Operations Manager	FRS E	1	0	1	2,939	1	2,939	
	FFD Operations Support	FRS C	1	46,261	1	48,000	1	48,960	
	FFD Welfare Support Manager	FRS F	1	80,113	1	83,106	1	84,768	

Grand Total		35	2,146,741	34	2,473,431	27	1,987,974
	Team Size	35		34		27	

3 Equality comments

- 3.1** The LFC and the Deputy Mayor for Planning, Regeneration and the Fire Service are required to have due regard to the Public Sector Equality Duty (section 149 of the Equality Act 2010) when taking decisions. This in broad terms involves understanding the potential impact of policy and decisions on different people, taking this into account and then evidencing how decisions were reached.
- 3.2** It is important to note that consideration of the Public Sector Equality Duty is not a one-off task. The duty must be fulfilled before taking a decision, at the time of taking a decision, and after the decision has been taken.
- 3.3** The protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership (but only in respect of the requirements to have due regard to the need to eliminate discrimination), race (ethnic or national origins, colour or nationality), religion or belief (including lack of belief), sex, and sexual orientation.
- 3.4** The Public Sector Equality Duty requires decision-takers in the exercise of all their functions, to have due regard to the need to:
- eliminate discrimination, harassment and victimisation and other prohibited conduct.
 - advance equality of opportunity between people who share a relevant protected characteristic and persons who do not share it.
 - foster good relations between people who share a relevant protected characteristic and persons who do not share it.
- 3.5** Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:
- remove or minimise disadvantages suffered by persons who share a relevant protected characteristic where those disadvantages are connected to that characteristic.
 - take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it.
 - encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
- 3.6** The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.
- 3.7** Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:

- tackle prejudice
- promote understanding.

3.8 An Equality Impact Assessment (EIA) has been completed to support this report. For the Firefighter development growth bid, the EIA led to Recommendation 1, suggesting that no changes are necessary due to the anticipated robustness of the activity. This activity is notable for its comprehensive consideration of diverse colleagues, reflecting a strong commitment to operational effectiveness. It greatly promotes compliance with the Equality Act 2010 and demonstrates due regard for the Public Sector Equality Duty (PSED).

4 Workforce comments

- 4.1** Informal staff side consultation has taken place on the ongoing changes to Firefighter development with a regular monthly Learning and Professional Development/Fire Brigades Union training meeting where FFD and the future improvements are discussed. Future consultation with representative bodies will take place via the joint committee's where appropriate.
- 4.2** As part of the consultation on the FFD team changes, the Fire Brigades Union raised concerns over the probation policy for trainee firefighters as well as the course duration of the FFD programme. Both areas of concern are being discussed in the appropriate forums with the Fire Brigades Union but do not specifically relate to the establishment of a dedicated FFD team within Learning and Professional Development.

5 Sustainability comments

- 5.1** This report does not introduce any significant sustainability impacts. Where new policies and/or corporate projects arise, they are subject to the Brigade's sustainable development impact assessment process.

6 Procurement comments

- 6.1** There are no anticipated procurement requirement for this report. However, officers will continue to work collaboratively with the procurement department to plan formal procurement activity across all areas of work.

7 Communications comments

- 7.1** There are no anticipated communication requirement for this report. However, officers will continue to work collaboratively with the Communications department to plan formal communications activity across all areas of work.

8 Financial comments

- 8.1** Creation of the new LFB Firefighter Development Team is directly linked to the Modern Firefighting Programme – one of eight programmes delivering the strategic ambition of LFB's Community Risk Management Plan (CRMP). As part of this programme a special investment bid of £20m over 2024/25 and 2025/26 was allocated to invest in training and associated equipment. Funding for the LFB Firefighter Development Team is included as part of this special investment allocation, at departmental level.

- 8.2** This paper is seeking authorisation to commit to revenue expenditure for the creation of the new LFB Firefighter Development Team. The anticipated cost of the Firefighter Development Team implementation is approximately £2,346,741 in 2024-25, £2,473,431 in 2025-26 and £1,987,974 annually in future years

These costs are based on 2024/25 unit costs incorporating a 4% pay award and 2025/26 and 2026/27 unit costs, incorporating anticipated future year pay increases at

2% to allow for full costing over the three-year period.

- 9 Funding of £2,989,000, £2,010,000 and £2,010,000 for 2024/25, 2025/26 and 2026/27 respectively for the creation of the team was approved as a Training & Professional departmental budget. The 24/25 underspend to budget will be held in reserves for the following year. The total anticipated costs across the three years, outlined in this paper, would therefore stay under these approved budgets, leaving a potential surplus of £200,854. These are the figures that are reflected in the latest budget submission.

10 Legal comments

- 10.1** Under section 9 of the Policing and Crime Act 2017, the London Fire Commissioner (the "Commissioner") is established as a corporation sole with the Mayor appointing the occupant of that office.
- 10.2** Section 1 of the Fire and Rescue Services Act 2004 ("FRSA 2004") states that the Commissioner is the fire and rescue authority for Greater London.
- 10.3** Under section 327D of the Greater London Authority Act 1999, as amended by the Policing and Crime Act 2017, the Mayor may issue to the Commissioner specific or general directions as to the manner in which the holder of that office is to exercise his or her functions.
- 10.4** By direction dated 1 April 2018, the Mayor set out those matters, for which the Commissioner would require the prior approval of either the Mayor or the Deputy Mayor.
- 10.5** Paragraph (b) of Part 2 of the said direction requires the Commissioner to seek the prior approval of the Deputy Mayor before "[a] commitment to expenditure (capital or revenue) of £150,000 or above as identified in accordance with normal accounting practices..."
- 10.6** The statutory basis for the actions proposed in this report is provided by section 7 (2)(a) of the FRSA 2004, under which the Commissioner must secure the provision of personnel, services and equipment necessary to efficiently meet all normal requirements for firefighting.
- 10.7** Furthermore, under section 7 (2)(b) of the aforementioned Act the Commissioner must secure the provision of training for personnel.

List of appendices

Appendix	Title	Open or confidential*
1	FFD Team structure	Open
2	Equalities Impact Assessment	Open

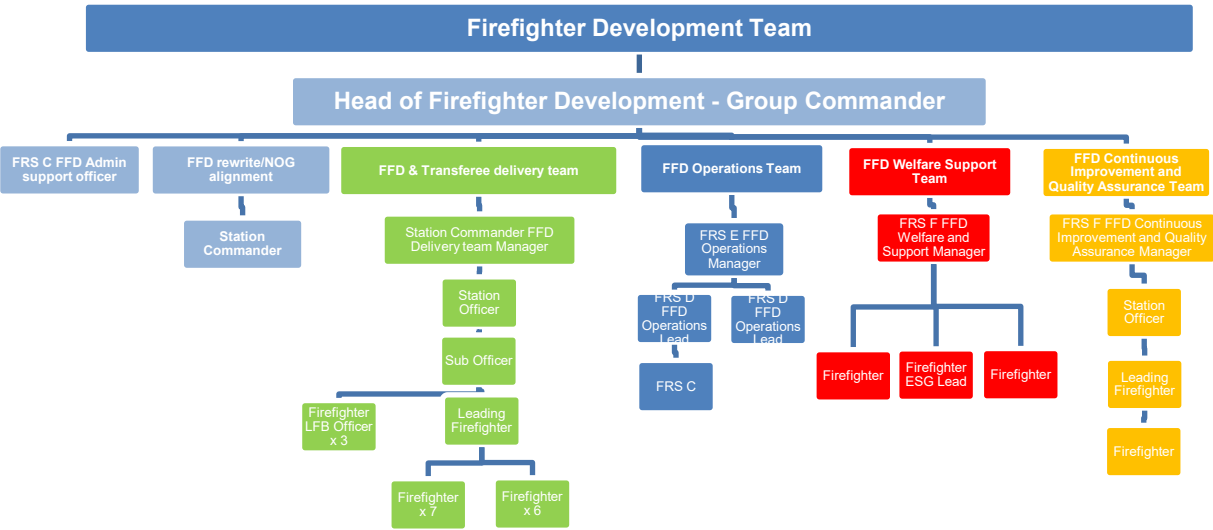
Part two confidentiality

Only the facts or advice considered to be exempt from disclosure under the FOI Act should be in the separate Part Two form, together with the legal rationale for non-publication.

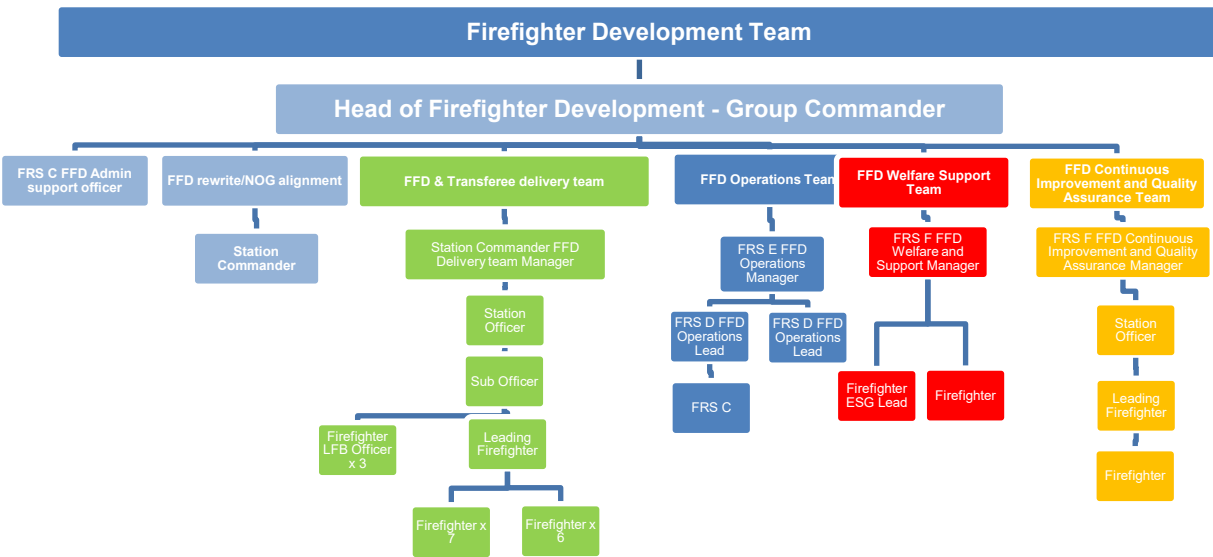
Is there a Part Two form: NO*

Appendix 1

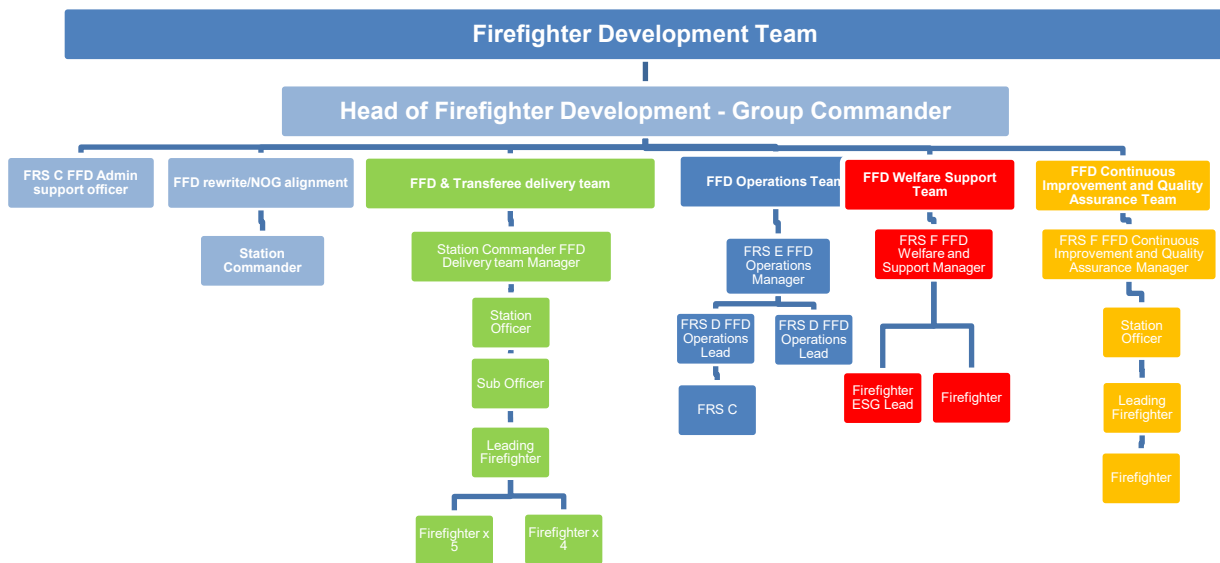
2024/25 FFD team Structure – Total establishment 35



2025/26 FFD team Structure – Total establishment 34



2026/27 FFD team Structure – Total establishment 27



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

Firefighter development (FFD) growth bid

1. Increase the FFD training programme from 13 weeks to 15 weeks
2. Implement and establish the agreed structure of a new dedicated FFD implementation team

B. Reason for Equality Impact Assessment

Please delete as applicable:

- Proposed changes to the existing activity.

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

Responsibility for the EIA:

Name: Joseph Kenny
Job title: Head of Firefighter Development
Department: Learning and professional development
Name: Divya Patel
Job title: FFD Welfare and Support Manager
Department: Learning and professional development

Responsibility for the whole activity:

Name: Joseph Kenny
Job title: Head of Firefighter Development
Department: Learning and professional development
Name: Divya Patel
Job title: FFD Welfare and Support Manager
Department: Learning and professional development

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

New and existing Apprentices.
L&PD department specifically the FFD training team.
Property department.
FLEET department.
Babcock training.
Fire Stations.

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

The document this EIA is based on.

[Public Sector Equality Duty](#)

[Equality Act 2010](#)

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

LFB [Values](#)

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](#)

[The LFB key EDI terminology](#)

HRE36 [Meeting the religious, spiritual and pastoral care needs of staff](#)

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](#)

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

Also considering:

- Caring responsibilities
- Socio-economic backgrounds

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

The general considerations made within the assessment are that the FFD training programme has increased to 15 weeks since the beginning of April 2024 and the core content of the FFD training programme has not been changed. The course delivery model has changed to reflect the additional two weeks added to the training schedule as well as the ability for the LFB to take over responsibility of certain elements of the programme which have previously fallen to Babcock to deliver as there was no alternative option historically.

No new acquisition training has been included at this stage.

Also, the current FFD program is already being delivered across multiple training venues and so seeking a change to this was not within scope due to no centralised training centre being an option.

Note that the new FFD implementation team will now provide support and oversight over the whole apprenticeship period from the start of training through to the end of the Apprentices' apprenticeship at station.

It is not anticipated that the approval to set up a dedicated FFD implementation team will have an adverse impact on physical, or mental wellbeing of staff and/or communities. All training venues within the 15 week training course are existing FFD training venues. Currently the FFD implementation team has been established

for approximately 2 years, however there's has been no dedicated establishment for this. It has been staffed by detachments from Operational Fire Stations, which has had other impacts on service delivery and staff's job security within the FFD team.

It is anticipated that the dedicated FFD team will have a positive impact on wellbeing of new joiners and existing apprentices as it will provide a better training experience by providing more time for learning, which will subsequently reduce re-coursing. The addition of a dedicated welfare and support team will enhance wellbeing support provided to both apprentices and watch officers who are at an operational fire station, signposting them to additional services as required.

There may be a slight financial impact on FFD's who will now remain as a TFF for 2 weeks longer and as such not receive the pay rise to an FFD for an additional two weeks, however when off set against the reduction in re-coursing rates and the anticipated benefits the new course is to have on underrepresented groups, especially those with additional learning support requirements, the impact is tolerable and expected to benefit most. This financial impact will only be applicable to a TFF who would have previously progressed through the 13 week training course without delay.

Increasing the FFD training programme to 15 weeks and establishing a dedicated FFD implementation team will have a positive impact on the diversity and retention of operational staff as it will complement the positive work carried out by the Outreach team and recruitment in screening and processing new joiners. It will also provide additional opportunities for staff from underrepresented groups to join the FFD team across a range of operational and FRS roles, to influence and support positive change as well as ensuring the team is a diverse and representative as possible.

This will ensure that the LFB's cultural change priorities are driven from the first day a new joiner starts and is supported by a diverse FFD team.

The dedicated FFD team also provided sufficient resource to begin developing a fit for purpose FF competency framework which, once agreed, will be the baseline for developing the LFB's next iteration of FFD training. It will ensure all core competencies are captured and detail how and when they will be taught/trained, and to what frequency. This then will allow training to become more effective and efficient but most importantly ensure LFB FF's are adequately trained for the incidents and challenges they're expected to deal with.

Gender and gender reassignment - 10.36% operational workforce are women (May 24 LFB data)

It was highlighted in the July 2023 business assurance report that female TFF's were adversely impacted by the, at the time, 13 week training course due to the compressed nature of the course. The increase to 15 weeks will positively impact this due to the reduction of self-study requirements outside of the training environment.

“There is a lack of flexibility for FFD trainees with childcare responsibilities (which impacts female FFD trainees more than male FFD trainees) due to the compressed nature of the course. “

An increase in training to 15 weeks and subsequent reduction in re-coursing rates may positively impact women if they have a higher probability of re-coursing. However as per the July 2023 FFD Re-coursing assurance review, the data did not show a disproportionate of black and minority ethnic, female staff being re-coursed during FFD training.

Setting up a dedicated FFD team, with options for staff to access an alternative working pattern as appose to the current 2 days/2 nights operational shift pattern, may positively impact woman, who are more likely to seek alternative flexible

working patterns.

WHEN – from April 2024 onwards

WHO – LFB FFD team and Babcock

HOW – The new 15 week course has been designed and will now be delivered jointly between the LFB and Babcock.

The re-introduction of the 'Buddy' Programme (through the new Welfare Team) allows for women who may feel isolated at station to network and have a safe space to share their experiences. Women are the primary users of this service which is offered to all.

WHEN – the buddy programme is currently live

WHO – LFB FFD Welfare and Support Team

HOW – The LFB FFD Welfare and Support team will administer the programme and provide buddy's as and when requested or its been identified as being beneficial to a TFF.

The FFD Implementation team will have a dedicated Welfare and Support team who will be able to assist and signpost staff to relevant support groups. The Welfare and Support team are able to provide a more individually focussed support structure as appose to generic support available to all should they require/request it. The team are also working with Babcock to ensure there are gender neutral facilities at training venues.

WHEN – signposted is done during all phases of the Apprenticeship

WHO – this is carried out by the LFB FFD team, Babcock trainers and ESG's

HOW – there are dedicated sessions within the Welcome day, phase 1 and phase 3 training where by Apprentices are provided information relating to support groups. This information is also provided as an when its been identified as possibly being required by the FFD welfare and support team.

Race - 15.52% operational workforce are ethnically diverse. A majority are Black Caribbean. An increase in training to 15 weeks and subsequent reduction in re-coursing rates may positively impact those from an ethnic minority background or English as a second language if they have a higher probability of re-coursing. However as per the July 2023 FFD Re-coursing assurance review, the data did not show a disproportionate of black and minority ethnic, female staff being re-coursed during FFD training.

WHEN – from April 2024 onwards

WHO – LFB FFD team and Babcock

HOW – The new 15 week course has been designed and will now be delivered jointly between the LFB and Babcock

There may be a correlation between low socio economic background and some ethnic backgrounds. For example statistics show Bangladeshi, Pakistani and Black background groups feature in the lowest income groups, therefore the additional two weeks training will impact staff from these backgrounds more.

The additional training time within the schedule has provided opportunity for additional support to be provided to all TFF's, plus research into additional external support. An example of this being access for a reduced rate TFL travel card for Apprentices which LFB Apprentices may be eligible for, thus reducing there travel costs whilst in training and across the first year of their apprenticeship.

WHEN – at the TFF welcome day, information about additional support will be provided to all TFF's, such as the TFL travel card

WHO – LFB FFD team

HOW – This will be included within the welcome day information pack provided and TFF will be verbally informed.

The new FFD Welfare team are working in union with BEMM (Black, Ethnic Minority Members) and Asian Fire Service Association, to provide peer support and networking for ethnically diverse members.

There is training budget for Equality, Diversity and Inclusion training for staff to improve knowledge, understanding and self awareness

WHEN – a pilot of bespoke EDI training is starting in June 2024 for the FFD training team and rolled out to all the LFB FFD team over the next 6-9 months.

WHO – LFB belonging, inclusion and wellbeing team

HOW – training days delivered by the belonging, inclusion and wellbeing team.

Age - A majority of FFDs are aged between 20-39 years.

The demands and pace of training may particularly impact young people entering a rigorous training schedule of learning and the responsibilities placed upon them in a disciplined environment. Equally there may be older people starting training later in life and this requires different skills to the ones they are used to (i.e always worked in an office environment). The result of this may be finding the course challenging and result in re-coursing, which the increase in training time is aimed at reducing. Cost of living impacting travel may impact different age groups however additional external support is able to be explored with the additional FFD team establishment, such as access to a reduced TFL travel card for Apprentices.

WHEN – at the TFF welcome day, information about additional support will be provided to all TFF's, such as the TFL travel card

WHO – LFB FFD team

HOW – This will be included within the welcome day information pack provided and TFF will be verbally informed.

Sexual orientation - 5.84% operational workforce have disclosed they are LGBTQ+ (Power BI May 2024)

The new FFD Implementation team are seeking to ensure training venues include gender neutral facilities and provisions are in place to onboard them with their preferred pronoun.

WHEN – a review of all training venues has been complete by the positive improvement team and a recommendations report produced with what is needed for the improvements

WHO – Positive improvement team, LFB property and FFD Team.

HOW – improve the facilities as part of the LFB's privacy for all project plan

There will be minimal impact to this group.

Disability - 7.3% of the operational workforce disclose a disability. At the moment the Brigade don't distinguish between physical disability and cognitive disability.

Due to the requirements of the Firefighter role, some people with certain neurodiversity's may find it challenging to carry out risk critical aspects of training.

Reasonable adjustments will be made to non-risk critical aspects. When considering what is reasonable, it is worth considering that the LFC has a public duty in combating fire and providing emergency services in order to preserve and maintain life. The LFC is a public body, it has a duty under Article 2 of the ECHR to the wider general public. In addition, the public scrutiny for the LFC is high in light of the Grenfell Tower incident.

Some conditions may impact a persons ability (positively or negatively) to write

clearly, mental mathematical calculations, retain information in the short/long term, focus for long periods of time, follow process accurately, learn complex information at speed, understand and recall information under pressure, think dynamically and problem solve

It can also impact their ability to work at speed and tolerate stress, particularly to their senses (i.e. bright light, crowds, loud noise, extreme heat or extreme cold) and other sensory stimuli can also be difficult for some neurodiversity's.

11% of the FFD joiners between 1/10/22-30/9/23 disclosed a disability.

The FFD implementation team will continue to work alongside the existing learning support team within the LFB to support Apprentices. The introduction of workplace passports support FFDs to share their support needs, particularly with their stations.

WHEN – this process is currently in place and well established which includes screening for learning support requirements with screening being provided to TFF's should it be identified during training that adjustments may be required to help support.

WHO – existing LFB learning support team and the LFB FFD team

HOW – Existing screening provisions remain in place.

Religion or belief - There will be minimal impact to this group.

Reflection rooms/spaces can be accommodated at all venues upon request. Some religions require fasting at specific times, the FFD team suggest ways to accommodate this, provided there are no health and safety implications.

Marriage/Civil partnership – There will be minimal impact to this group

Pregnancy and Maternity – There will be minimal impact to this group

Impacts on groups outside the Equality Act 2010

The FFD program is recognised as being high intensity and condensed into a short time scale. The demands placed on TFF's is great, with the program being delivered across multiple venues within the LFB area. Where possible, movement between venues has been kept to a minimum, and durations at each venue has been scheduled so to avoid regular changes of venues. At present, the FFD program is held at three base locations (Harrow, Plaistow and Park Royal). Where TFF's are re-coursed due to sickness or under performance, they're held at an additional venue (Barking) where they received further additional training whilst awaiting another FFD course.

The setting up of a dedicated FFD implementation team is anticipated to have a positive to all group inside and outside the Equality Act 2010, as it introduces a significant amount of resource with key priorities to improve the content and delivery of the FFD programme, ensure it meets the needs of all and ensure TFF's are trained to safely and effectively carry out their role. It also provides support for the watch officers when an Apprentice is placed onto an operational fire station.

The cost of living will impact those already in low income households, travel costs are rising and will impact those who work outside of London and travel in. Those with care responsibilities will need to make provisions to accommodate their training schedule as there are fixed times and dates to attend the training to ensure they meet the standards required.

Babcock and LFB have systems and policies to address any allegations of discrimination, these should be addressed early and steps will be taken as appropriate. These systems have been enhanced with the introduction of a simpler

and confidential reporting process and support from the PSU.
In the first two weeks, trainees receive an input/signposted to learning support, mental health services, counselling services and the Equality Support Groups they can access

Each cohort is assigned a lead LFB trainer from the FFD team to ensure they oversee each person's training, monitors delivery of training for fairness and an equitable experience.

The FFD team are developing a schedule of training in Equality, Diversity and Inclusion to ensure they have enhanced levels of understanding and awareness in these areas to better support the FFDs and colleagues.

The Brigade has an Outreach team who proactively encourage applications from different communities. This results in positive relations with diverse communities and instils trust in the LFB through being an employer which welcomes applications from all, particularly those currently underrepresented in the workforce. Post culture review, this is very important that every person joining feels valued, included and able to perform to their potential from day one of joining the organisation.

Sources Used

LFB Equalities Data as of May 2024

FFD Re-coursing assurance review July 2023

People Service Bi-Annual performance report Q3-Q4 2023-24

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?

ESG via the bi-monthly meeting
Positive Improvement Team via a monthly meeting

All engagement in relation to the changes to FFD have been very positive. Both the ESG's and PIT have historical view on FFD and potentially the lack of support/scrutiny that it has had in the past. There was also a general consensus that the training programme wasn't long enough and didn't best support new TFF, especially ones with a protected characteristic. The positive changes being made go a long way to address these concerns and also put in place a dedicated support structure not only for TFF's whilst in training but also when out at an operational fire station.

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?

The FFD team have taken the insights from the ESG's and PIT, along with reviewing past reports/recommendations/reviews which impact FFD and designed the new structure and FFD training programme to directly support these. An

example of this would be the introduction of the new 2 week phase 3 training designed to better support the transition from training into an operational fire station. This includes a meeting with the TFF's watch officer. We now have LFB trainers, working and training alongside Babcock staff. We have a QA function within FFD, to ensure that Babcock are also acting and behaving in line with the LFB Values and how we expect our staff to act. We have a much greater, on the ground presence at all training venues which allow us to support TFF's as well as review that the training is being delivered as expected.

We will continue to seek feedback on a monthly basis as a default and on a one to one basis where the exception is needed. As part of the governance of FFD, an FFD board is to be set up whereby the progress of the changes can be reviewed.

We are taking a very proactive and flexible approach to making improvements within the programme but also have updated the way feedback is gathered to allow us to evaluate the success of the changes. We now collate real time feedback from delegates by way of MS Forms and scanning QR codes. This allow us to see whats working and whether changes need to be made. We also have a structure in place which allows for the FFD Welfare and Support manager to understand individual concerns/issues where bespoke support is needed over and above whats currently available.

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?

Not that I am aware of. I am confident that we have been able to talk to many different people and gain insights and experiences from a good range of individuals, plus support groups. This has allowed the FFD team to recommend a structure to address a wide range of issues within FFD and be able to focus on making fundamental changes across the board rather than only focussing on short term views.

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?

There are two board areas this EIA covers for the FFD changes. The structure and FFD team itself and then the changes made to the FFD training programme.

FFD Team Structure – the structure has deliberately included a range of operational and FRS posts, plus a range of ranks/grades. This is to provide as much opportunity as possible across the organisation rather than focussing on a small number of eligible people. This also ensures the team is accessible to a far more diverse range of people across the organisation. This approach has already shown its working following positive feedback from female TFF's who have said its been great to see other female staff across multiple ranks delivering training. Its gives them someone to aspire and relate too whilst they go through training.

TFF Training programme – the training programme has been increased in length and has also had changes to the teaching methodology/practices as a result of the additional learning time available. There is a lot more demonstrating within the

programme and more practice time to support TFF's who have additional learning support requirements. The additional time also allows for more feedback and self-reflection, plus it breaks up the competencies to more manageable chunks. The biggest feedback reviewed in the old programme was that most people who were being recourse just needed that little bit of extra time. The new programme compensates for this and helps support all new joiners who are required to learn a lot in a short space of time. The increased learning time has also reduced/nearly eliminated the need for home study. This is one of the biggest changes which helps support people with child care and other caring responsibilities. The LFB and Babcock work in tandem to identify where additional support may be needed and made a referrals to the LFB's Learning Support team for an assessment. Babcock should deliver training to meet different learning styles as they gather this information at the beginning from each person. The dedicated FFD learning support resource will be able to prioritise the support provided to Apprentices

The financial impact due to increasing the course can be mitigated by supporting Apprentices to access the discounted TFL travel card for Apprentices whilst they're in learning. Information to be included in the welcome day pack for all Apprentices.

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?

To support all TFF's the training programme gives all advanced access to the learning material via their tablets, whereby the print size can be changes to suit the reader. There is face to face training presentations delivered, hand outs provided, demonstrations provided and exercising. Where appropriate additional learning support is put in place with extra assessment time, different colour overlays and software for the TFF's tablets.

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.		
2.		
3.		
4.		

I. Signed by the Submitter

Name: Joseph Kenny

Rank/Grade: Group Commander

Date: 21 May 2024

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.

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 changes are required, as the assessment indicates that the activity is robust.

For the Firefighter development growth bid, the EIA led to Recommendation 1, suggesting that no changes are necessary due to the anticipated robustness of the activity. This activity is notable for its comprehensive consideration of diverse colleagues, reflecting a strong commitment to operational effectiveness. It greatly promotes compliance with the Equality Act 2010 and demonstrates due regard for the Public Sector Equality Duty (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: 04/06/2024