



LONDON FIRE BRIGADE

Equality Impact Assessment (EIA) Initial Screening Form

When completing this form please use the [EIA guidance notes](#) and check our other resources on our dedicated [EIA Hotwire pages](#)

This form enables you to screen each protected characteristic and identify which may be positively or negatively impacted by your activity.

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 will:

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

You must be able to show that your activity meets the three conditions of the due regard by providing relevant information to show how it caters for people with protected characteristics (where applicable), through eliminating potential discrimination and promoting opportunities to build equity between all groups.

You will only be required to complete a full EIA assessment of the areas where you have identified a negative impact, and further adjustments will be required.

Use the fields below to record any impacts and potential mitigating actions against each protected characteristic. All complete initial screening forms should be submitted to the EIA team to review and confirm your next steps.



LONDON FIRE BRIGADE

Equality Impact Assessment (EIA) Initial Screening Form

A. Name, status and expected outcomes of the activity

Terrain Support Vehicle (TSV). To provide new off-road vehicles that would provide an enhanced operational capability for a wildfire response across both rural and urban areas of London.

These vehicles will help crews extinguish wildfires more quickly and effectively by delivering water over long distances that would otherwise require crews to travel on foot. They will reduce exposure to heat, exhaustion, dehydration and carcinogens. Additionally, these vehicles may enable crews to contain incidents before additional personnel need to be deployed.

The vehicles will allow the Brigade to reduce the footprint of the incident quickly allowing communities back into their homes and places of work. It will also reduce the level of toxins in the air.

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

This policy applies to Front line crews and communities local to Wildfire incidents.

C. Reason for Equality Impact Assessment



LONDON FIRE BRIGADE

Equality Impact Assessment (EIA) Initial Screening Form

Having due regard to Public Sector Equality Duty (PSED), this EIA is being performed to assess the effect the procurement of new Terrain Support Vehicles will have alongside its supporting material has on LFB's workforce.

A designated policy has not yet been formalised due to use of the TSV being a pilot which has now concluded. A formal process has commenced to deliver a TSV policy with full stakeholder engagement. Policies linked to firefighting in open spaces already exist and have considered EIA implications.

The following internal and external partners were contacted and / or consulted with regarding the commencement of the TSV pilot. All internal stakeholders have been alerted and consulted with:

- Preparedness and Response
- Central Operations
- Operational Policy and Assurance
- Operational Resilience and Control
- The Fire Brigade's Union

Real insight was gained from liaising with all partners regarding the implementation of this pilot. Complexities were raised and addressed regarding the delivery of the TSV capability however it was established that the use of TSV's actually improves the safety of first responders and reduces the risk to members of public affected by incidents in a variety of complex terrains.

Feedback has been collated from frontline operatives following the completion of the TSV pilot and will form a fundamental part of the formalisation of the TSV capability.

The vehicles will be used to respond to incidents across London and at community engagement events, showcasing the LFB's response to wildfire incidents and climate change.

The TSVs have supported a range of incidents across communities in London and across the UK. Broadening the support offered to communities.



LONDON FIRE BRIGADE

Equality Impact Assessment (EIA) Initial Screening Form

A two-year trial period has highlighted the above improvements to the culture of the organisation.

[Public Sector Equality Duty](#)

[Equality Act 2010](#)

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

LFB [Values](#)

People Services Strategy

Grey Book

[LFB Equity 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](#)

[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. 538 [Annual leave and public holiday leave allocation policy – operational staff](#)

Policy No. 651 [Station allocation and transfer policy](#)

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

Policy No. 327 [Guidance for senior managers in relation to mobilising and rota management](#)

Policy No. 538 - [station based establishment and skills requirements](#)

[Role to rank collective agreement 2019](#)

Policy No. 512 – [Special leave policy](#)



LONDON FIRE BRIGADE

Equality Impact Assessment (EIA) Initial Screening Form

Policy No. 888 – [Partial attendance policy](#)
Policy No. 1008 – [Trade union time off and facilities policy](#)
Policy No. 965 – [Equality support groups](#)
Policy No. 251 – [Station Working Routines](#)

It is recognised that when performing its regulatory role, LFB will regularly deal with persons outside of the LFB workforce. The PSED applies equally to LFB's external activities, such as our dealings with members of the public, third parties and external agencies. As such, due consideration has been given to the PSED in respect of our external activities when devising this policy.

D. Team responsible for the activity *(Please provide two different names for resilience)*

EIA Author(s):

Name: Jason Salim
Job title: Station Officer
Department: Operational Resilience and Control

EIA Owner(s):

Name: Phillip Morton
Job title: DAC
Department: Operational Resilience and Control



LONDON FIRE BRIGADE

Equality Impact Assessment (EIA) Initial Screening Form

E. Equality and diversity considerations					
Protected Characteristic	Positive Impact ✓	Negative Impact ✓	Summary of impact	Is a mitigating action required?	
				Yes	No
Age	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>To ensure staff across all age groups obtain the skills they need to perform their designated role when using the TSV's, LFB will provide suitable and sufficient training to ensure that staff members will have confidence in using larger/complex/new vehicles regardless of age. Older staff members may be impacted by physical access issues such as (steps, seat height, vibration caused by the vehicle) This is accounted for via additional LFB policies and each operational firefighter must undergo a fitness assessment. If a firefighter passes this assessment, they are physically able to use this equipment.</p> <p>It is recognised that older staff may be at greater risk of lower digital literacy, meaning there are potential risks regarding their ability to assimilate learning that uses technology. To mitigate the potential risks and to ensure relevant training material is fully accessible for staff with different learning needs, staff across all age groups are provided with classroom training that has been devised with due consideration to relevant inclusion guides and policies. These include the LFB "Accessible Communication Guide" and LFB Policy Note 0553, "Learning Support Policy".</p> <p>When choosing to procure the vehicle consideration was given to vehicles with adjustable controls, low step heights, and ergonomic seating that also fit the use case parameters for the LFB.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Equality Impact Assessment (EIA) Initial Screening Form

			<p>It is considered that the procurement of new TSV's does not negatively disproportionately impact staff with this protected characteristic as the primary users of the item.</p> <p>LFB Age Data for operational staff @ 31 October 2025 is as follows: Total number of operational staff making up workforce = 4744 Age under 20: 4 (0.08%), Age 20-29: 530 (11.17%), Age 30-39: 1397 (29.45%) Age 40-49: 1850 (39.00%), Age 50-54: 680 (14.33%), Age 55-59: 226 (4.76%), Age 60-64: 47 (0.99%), Age 65+: 10(0.85%)</p>		
Disability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>LFB has a duty to make reasonable adjustments for staff within this protected group. The provision of reasonable adjustments for staff within this protected group ensures that a person is not treated less favorably or placed at a substantial disadvantage because of their disability.</p> <p>It should be noted that the LFB are bound by the DVLA and any procured vehicle can only be driven in accordance with their requirements.</p> <p>It is recognised that any text-heavy policies created after the procurement of TSV's may be overwhelming for neurodivergent staff and that staff with visual or auditory impairments could struggle to access the policy. To ensure material is fully accessible to each person's individual need, this policy and its supporting documents have been formulated with due consideration to relevant inclusion guides and policies, including the LFB "Accessible Communication Guide" and LFB Policy Note 0553, "Learning Support Policy".</p> <p>Vehicle design has been considered to try and adequately accommodate operators or passengers with mobility, sensory, or dexterity impairments. To ensure accessibility and</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Equality Impact Assessment (EIA) Initial Screening Form

			<p>inclusion, vehicles should incorporate adaptive controls, adjustable seating, and visual or auditory alerts. Boarding and disembarking facilities, such as ramps, lifts, handrails, and steps, should be improved to support safe access. Interior features should include clear, high-contrast signage, labelled equipment showing weights and required personnel, and lockers with drawers that pull out and down for easier access. Considerations are to be made for relocating the blue light controller to prevent accidental activation by some users. User trials involving disabled staff should be conducted to validate these adjustments, and reasonable accommodations, such as assistive technology and adapted PPE, must be provided to support all personnel.</p> <p>The hearing standards and hearing aid policy includes hearing standards for fire fighters, Provision of hearing aids for all operational incidents, identifying individuals that requiring hearing aids, testing process, obtaining a digital in-ear hearing aid, acclimatisation and return to full duties, guidance on hearing aids use at an incident, hearing reviews, insurance and maintenance, recording of issue of hearing on the workplace adjustment passport.</p> <p>Each operational firefighter must undergo a fitness assessment. If a firefighter passes this assessment, they are physically able to use this equipment alongside training.</p> <p>Furthermore, It is acknowledged that the implementation of workplace adjustments eliminates discrimination and provides advancement of opportunity for those with a disability. This in turn allows staff with or without this protected characteristic to access and use TSV's within the legal parameters thereby fostering and maintain good working relationships with colleagues.</p>		
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LONDON FIRE BRIGADE

Equality Impact Assessment (EIA) Initial Screening Form

			LFB Disability Data for operational staff @ 31 October 2025 is as follows: Total number of staff making up workforce = 5899 Disabled 388 (8.18%), Not disabled: 4153 (87.54%), Prefer not to say: 36 (0.76%) Information not provided: 167 (3.52%)		
Gender Reassignment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The LFB does not currently record DEI staff data for gender reassignment but for the purposes of this EIA it has been acknowledged that across all staffing groups, there are staff within the workforce who are either undergoing or have completed a gender transition. Due regard has been given to LFB Policy Note 323 "Trans Inclusion Policy" when considering the procurement of new TSV's and the creation of its subsequent supporting documents. The use of gender neutral signage and terminology will be used throughout the vehicle, its signage or supporting document. It is considered that this work does not negatively disproportionately impact staff with the Gender Reassignment protected characteristic.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Marriage / Civil Partnership	<input checked="" type="checkbox"/>	<input type="checkbox"/>	LFB does not currently record DEI staff data for marriage and civil partnerships but for the purposes of this EIA it has been acknowledged that across all staffing groups, there are staff within the workforce who are either married or are in a civil partnership. It is considered that this work does not negatively disproportionately impact staff with the Marriage/ Civil Partnership protected characteristic.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Pregnancy / Maternity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	LFB does not currently record DEI staff data for pregnancy and maternity but for the purposes of this EIA it has been acknowledged that there are staff within the workforce who are or have been pregnant and / or on maternity.	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Equality Impact Assessment (EIA) Initial Screening Form

			<p>When procuring Terrain Support Vehicles, consideration must be given to the health and safety of pregnant employees. Vehicle vibrations, jolting, and manual handling may pose health risks during pregnancy, and staff returning to work after parental leave may face barriers if vehicle operation is a core duty. Comprehensive risk assessments should be carried out for pregnant and returning employees, with alternative duties or modified vehicles offered where appropriate. Supportive return-to-work plans and flexible arrangements should be in place to ensure the safety, comfort, and inclusion of all staff.</p> <p>LFB Policy Notes PN 555 “Family Support Leave (including Maternity)” and PN 313 “Maternity provisions” outlines the requirement for workplace adjustments to be made in respect of expectant mothers. It is recognised that, having regard to these policies, managers will undertake a risk assessment (RA) as per LFB Policy 673. The RA process will be performed with due regard to LFB’s Pregnancy - Possible Risks Guide. This guide contains sections on “general precautionary measures”, “manual handling of loads” (which covers physical work), “extremes of cold and heat” and “movements and postures” to assist managers in the implementation of mitigating measures such as i) introducing frequent rest breaks to reduce fatigue or ii) reducing physical activities to ensure staff within this protected group are fully supported in their role which in turn have been considered in the procurement of the new TSV’s.</p> <p>It is considered that the procurement of new TSV’s does not negatively disproportionately impact staff with this protected characteristic.</p> <p>Due consideration has been given to LFB’s Health and Safety Policy PN 597, specifically para 4.30 which states that managers are responsible for “<i>Assessing the risks to the health and safety of their employees and any other person(s) affected by the Brigade’s work activities</i>”</p>		
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LONDON FIRE BRIGADE

Equality Impact Assessment (EIA) Initial Screening Form

			<i>in accordance with its policies and procedures and, where possible, the elimination or reduction of those risks."</i>		
Race	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Due regard has been given to LFB Policy Note PN 973 "LFB Equity Policy" and the LFB "Inclusion Strategy" when procuring new TSV's and creating its supporting material.</p> <p>It is considered that procuring new TSV's does not negatively disproportionately impact staff across different ethnicities.</p> <p>LFB Ethnicity Data for operational staff @ 31 October 2025 is as follows: The breakdown of 5899 staff by race and ethnicity of is White: 3759 (79.24%), Under represented Minority Ethnic: 752 (15.85%), Prefer not to say 63 (1.33 %) and 170 (3.58%) unknown.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Religion / Belief	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Due regard has been given to LFB Policy Note PN 973 "LFB Equity Policy" and the LFB "Inclusion Strategy" when procuring new TSV's and creating its supporting material.</p> <p>It is considered that procuring new TSV's and creating its supporting material does not negatively disproportionately impact staff across different religions or beliefs.</p> <p>Where staff require time to pray while carrying out their job roles, to ensure they are not disadvantaged, LFB's Inclusion Policies highlight the rights of staff to practice their religious duties without restriction. It is recognised that LFB's regulatory activities can potentially clash with activities relating to a member of staff's religion or belief, such as with the timing activities/training. The inclusion policies allow for adjustments to be made that support the religious needs of those undertaking activities thereby providing suitable</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Equality Impact Assessment (EIA) Initial Screening Form

			<p>mitigation to ensure those within this protected group are not disadvantaged because of their religion or belief.</p> <p>Certain religious or belief-based needs may intersect with uniform, PPE, or scheduling requirements related to terrain vehicle operation. For example, standard-issue PPE may conflict with religious dress such as head coverings, or shift patterns may coincide with prayer times or religious observances. These factors could create barriers for use of any newly obtained terrain vehicle unless navigated sensitively. Mitigation should include offering alternative PPE compatible with religious dress as outlined in LFB Policy, providing private spaces for prayer or reflection, and adopting flexible rostering to accommodate religious observances where operationally feasible. Consulting with faith representatives during the planning phase can help identify and address these issues early.</p> <p>LFB Religion/Belief Data for operational staff @ 31 October 2025 is as follows: Across the staff group, of 4744 staff members identify as Buddhist 54 (1.14%), Christian 1429 (30.12%), Hindu 19 (0.40%), Jewish 15 (0.32%), Muslim 86 (1.81%), Sikh 11 (0.23%), Other 156 (3.29%), No Religion 2011 (42.39%), Prefer not to say 150 (3.16%) and 813 (17.14%) Did not disclose</p>		
Sex	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Due regard has been given to LFB Policy Note PN 973 "LFB Equity Policy" and the LFB "Inclusion Strategy" when identifying new TSV's.</p> <p>Vehicle design and operational culture can unintentionally disadvantage staff based on gender. Ergonomic factors such as seat height, reach, or control strength can disproportionately affect women or individuals with smaller body builds if not accounted</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Equality Impact Assessment (EIA) Initial Screening Form

			<p>for in design specifications. Additionally, a lack of female representation in vehicle operation or maintenance roles may perpetuate sex imbalance. To mitigate these impacts, the procurement teams have considered inclusive design specifications ensuring adjustable seating, steering, and controls.</p> <p>The use of gender neutral signage and terminology will be used throughout the vehicle, its signage or supporting documents so not to perpetuate gender or sex binaries.</p> <p>Additional regard has also been given to Policy Note 969 “Menopause Policy”. PN 969 asserts that LFB will also discharge its responsibilities accordingly by specifically providing support to staff within this group, including those experiencing menopause symptoms, to access management support. It is considered that the procurement of new TSV’s will have no sex restrictions across the mix of sexes so eliminates discrimination and provides advancement of opportunity.</p> <p>Therefore it is considered that the procurement of new TSV’s does not negatively disproportionately impact staff protected under the Sex protected Characteristic.</p> <p>LFB Sex Data for operational staff @ 31 October 2025 is as follows: The sex breakdown of 4744 staff is 496 (10.46%) Female and 4248 (89.54%) Male as a total across operational staffing groups.</p>		
Sexual Orientation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Due regard has been given to LFB Policy Note PN 973 “LFB Equity Policy” and the LFB “Inclusion Strategy” when considering the procurement of new TSV’s.</p> <p>Although the procurement of terrain vehicles is unlikely to have a direct impact on individuals based on sexual orientation, indirect effects may arise from workplace culture</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Equality Impact Assessment (EIA) Initial Screening Form

			<p>and team dynamics. LGBT+ staff could face exclusion or discomfort if equality policies are not visible or if harassment is not effectively managed. To mitigate these risks, LFB will maintain strong anti-discrimination policies, promote inclusive behaviours, and provide visible support for LGBT+ inclusion (for example, through awareness campaigns or ally networks). Creating a respectful, open culture around vehicle operations ensures all staff feel safe and valued regardless of sexual orientation.</p> <p>The use of gender neutral signage and terminology will be used throughout the vehicle, its signage or supporting documents so not to perpetuate heteronormativity or cis-gender status.</p> <p>LFB sexual orientation Data for staff @ 30 September 2025 is as follows: Total number of staff making up workforce = 4744 Heterosexual 3407 (71.82 %), LGB 287 (6.05%) 1050 (22.13%) Did not disclose and preferred not to say.</p>		
Socio Economic*	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The LFB does not currently record DEI staff data for socio-economic backgrounds, but for this EIA it has been considered across all staffing groups in the workforce.</p> <p>Due regard has been given to LFB Policy Note PN 973 "LFB Equity Policy and the LFB "Inclusion Strategy" when considering TSV's for purchase. It is considered that the work has no restrictions to staff based on their socio-economic background.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Caring responsibilities*	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The LFB does not currently record DEI staff data for caring responsibilities, but for this EIA it has been considered across all staffing groups in the workforce. Due regard has been given when considering new vehicles and the documents that will accompany it.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Equality Impact Assessment (EIA) Initial Screening Form

			<p>Caring responsibilities (for children, disabled relatives, or elderly dependents) can significantly influence an individual's ability to engage in training, deployment, or operational duties related to terrain support vehicles. Shift work, unsociable hours, or extended periods of deployment can create disproportionate challenges for personnel with caring duties, potentially limiting access to certain operational roles or advancement opportunities. To mitigate these impacts, flexible rostering, predictable scheduling, and the availability of alternative duty arrangements will be considered wherever operationally feasible. Managers should ensure that staff with caring responsibilities are consulted and supported through open dialogue and equitable workload planning. Clear communication of expectations and available support (such as Policy No. 448 Working with choice – flexible working options policy, Policy No. 538 Annual leave and public holiday leave allocation policy – operational staff, Policy No. 0512 Special Leave and Policy No. 888 – Partial attendance policy) can further help ensure that no one is disadvantaged due to their personal or family circumstances.</p> <p>It is considered that the procurement of new TSV's will have no restrictions on staff with caring responsibilities.</p>		
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Explain why a full EIA is not required:

In undertaking this EIA, no detrimental impacts have been identified that cannot be mitigated or are unjustified.

Due regard has been demonstrated in line with the Equality Act 2010. Any potential disproportionate impact on staff with certain protected characteristics has been identified and considered through this initial EIA with appropriate reference to operational requirements.



LONDON FIRE BRIGADE

Equality Impact Assessment (EIA) Initial Screening Form

Section 19 of the Equality Act allows for indirect discrimination where it is a proportionate means of achieving a legitimate aim. In this case, we highlight the use of PPE or equipment specific to TSV's or Furthermore, or adhering to DVLA requirements. These could impact certain individuals but in the case of PPE have been identified as the only effective measure currently available to protect the life and health of staff working in irrespirable atmospheres. This requirement is supported and reinforced by relevant health and safety legislation (HSWA, MHSW, COSHH, HSG53).

Signed by the Submitter

Name: Philip Morton
Rank/Grade: Deputy Assistant Commissioner
Date: 07/11/2025

Email the completed form to EqualityImpactAssessment@london-fire.gov.uk
To be completed by the EIA team, and returned to the submitter:

Initial Recommendations

☐ **Further information required**

Insufficient information to support a recommendation

☐ **Continue with no change required [Recommendation 1]**

No adverse impact(s) identified and full explanations provided



LONDON FIRE BRIGADE

Equality Impact Assessment (EIA) Initial Screening Form

☐ **Full EIA required for affected characteristic before proceeding further**

Adverse impact(s) identified

Next steps

[text to be completed by the EIA Team]

Name: [text here]

Date: [text here]