



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.



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A. Name, status and expected outcomes of the activity

The supply of depolluted vehicles (scrap cars) – PN843

This policy provides details on:

1. This policy sets out the process for managing the use of de-polluted vehicles (scrap cars) at LFB premises. Specifically the following:
 - Training (including requirements prior to use)
 - The ordering of vehicles on SAP.
 - Delivery and collection arrangements.
 - Storage restrictions and arrangements at LFB premises.
 - Contracted fee and additional charges.

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

This policy applies to: all station-based staff along with training

C. Reason for Equality Impact Assessment



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Having due regard to Public Sector Equality Duty (PSED), this EIA is being performed to assess the effect this policy (**The supply of depolluted vehicles (scrap cars)**) and supporting material has on LFB's workforce.

The depolluted vehicle policy and its supporting documentation define processes and procedures which directly support the legislative requirements of this training activity

The purpose of depolluted vehicles (scrap cars) is defined within the policy under the following paragraphs:

4.1 Scrap cars are used throughout the LFB estate for training purposes.

5 Procedure

Training

- *What deformities need to be ordered to improve training?*
- *How much scrap car training is allowed/required?*
- *When scrap cars can be ordered for outside stations?*

5.1 Ordering

5.1 Before ordering scrap cars, staff must clearly identify training and community safety objectives that will be achieved. Cars are only to be ordered when budget permits and is considered by an appropriate authoriser/line manager.

5.2 The contractor will liaise with the purchasing team (SAP) only and will not accept orders made directly from any other fire brigade personnel.



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The Policy (843) and its supporting documents provide information on the ordering process and allocation per station, indicating that the purchase order must state: The training date (minimum three weeks' notice required) and whether a deformity is required. There is also information about the delivery (a visual inspection must be made) and collection along with failed collections procedure. There is also storage and use information within the policy.

[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](#)



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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](#)
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: Matt Jones
Job title: Station Commander
Department: Central Operations

EIA Owner(s):

Name: Peter Clark
Job title: Group Commander
Department: Central Operations



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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 and to advance in their career, LFB provides suitable and sufficient training in matters pertaining to The supply of depolluted vehicles (scrap cars) and its supporting documents.</p> <p>There is a relationship between the accessibility of digital resources and age. As working lives get longer, individuals must adapt to the pace of change. 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”. It is considered that the provisions of The supply of depolluted vehicles (scrap cars) does not negatively disproportionately impact staff with this protected characteristic.</p> <p>We recognise that age can influence an individual’s susceptibility to physical strain, fatigue, and manual-handling-related injury. Practical activities such as working around vehicles, applying force, adopting awkward postures, and moving or handling equipment may present increased risk for some staff as they age.</p> <p>To ensure safety, fairness, and the effective participation of all personnel, the potential impact of age-related physical considerations will be explicitly incorporated into:</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



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			<ul style="list-style-type: none"> • Local risk assessments, ensuring that training hazards (e.g., force requirements, repetitive movements, awkward postures, uneven ground, lifting/carrying demands) are evaluated with age-related capability in mind. • Training design and delivery, including: <ul style="list-style-type: none"> ○ adapting the pace or intensity of physical tasks where appropriate; ○ offering alternative methods or equipment that reduce manual-handling strain; ○ structuring rotations or rest periods to avoid cumulative fatigue; ○ providing clear instruction and safe techniques that minimise load and risk. <p>Supervisors and instructors will remain alert to signs of physical strain and will adjust activities where required to ensure that all staff—regardless of age—can participate safely and confidently. These considerations form an integral part of maintaining an inclusive, safe working environment for everyone involved.</p> <p>Total number of staff making up workforce = 4698 under 20: 3 (0.06%), Age 20-29: 514 (10.94%), Age 30-39: 1379 (29.35%) Age 40-49: 1845 (39.27), Age 50-54: 672 (14.30%), Age 55-59: 231 (4.92%),Age 60-64:44 (0.94%), Age 65+: 10(0.21%).</p>		
<p>Disability</p>	<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 favourably or placed at a substantial disadvantage because of their disability. Neurodiversity is recognised as a disability under the Equality Act (2010) and it is recognised that text-heavy policies 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</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



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			<p>guides and policies, including the LFB “Accessible Communication Guide” and LFB Policy Note 0553, “Learning Support Policy”.</p> <p>The policy considers adjustments that must be made to ensure accessibility considerations for individuals with physical disability or for those experiencing conditions which meet the Equality Act’s definition of “impairment”. 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 these policy provisions thereby ensuring all staff performing the regulatory roles to which this policy applies, can foster and maintain good working relationships with colleagues.</p> <p>As part of our commitment to equality, inclusivity, and meeting our obligations under the Equality Act 2010, reasonable adjustments will be applied not only to access the written policy but also to the delivery of practical scrap-car training activities. We recognise that the physical nature of this training—such as working around vehicles, managing uneven ground, undertaking manual handling tasks, adopting awkward postures (leaning, kneeling, crouching, reaching), and coping with fatigue or pain—may present additional challenges for staff with physical disabilities or long-term health conditions, including but not limited to MS, arthritis, mobility impairments, or sensory needs.</p> <p>To ensure all staff can participate safely and effectively, the training will incorporate the following reasonable adjustments where required:</p> <ul style="list-style-type: none"> • Modified roles or task allocation to reduce or remove activities that present mobility, strength, or fatigue-related barriers. • Alternative practical tasks that still achieve the learning objectives without requiring high force, difficult postures, or sustained physical effort. • Environmental adjustments, such as improved access around scrap vehicles, 		
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			<p>stabilising uneven ground where possible, or providing supportive equipment.</p> <ul style="list-style-type: none"> • Adapted briefing formats, including visual, written, step-by-step, or slower-paced briefings, ensuring clarity for those with sensory, cognitive, or communication needs. • Communication support including friendly positioning, or quiet-space briefings for individuals with auditory processing or sensory considerations. • Additional rest breaks or pacing of activities to manage fatigue or pain conditions. • The option for observational participation where a staff member’s capability varies or where full physical involvement is not safe or appropriate, for instance if they are light duties. <p>Reasonable adjustments will be identified collaboratively through discussion with the individual, their line manager, and relevant occupational health or EDI advisers. These adjustments will be recorded, reviewed regularly, and applied consistently across all scrap-car training sessions to ensure safe, fair, and inclusive participation for all staff</p> <p>Total number of staff making up workforce = 4698 4104 (87.36%) Identify as not disabled, 543 (9.30%) Disabled, 36 (0.77%) Prefer not to say and 166 (3.53%) don’t provide Information.</p>		
<p>Gender Reassignment</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>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 formulating the provisions of The supply of depolluted vehicles (scrap cars) and its supporting documents.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



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			It is considered that the policy provisions/activity of The supply of depolluted vehicles (scrap cars) does not negatively disproportionately impact staff with this protected characteristic.		
Marriage / Civil Partnership	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>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.</p> <p>It is considered that the policy provisions/activity of The supply of depolluted vehicles (scrap cars) does not negatively disproportionately impact staff with this protected characteristic.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Pregnancy / Maternity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p><i>LFB does not currently record DEI data relating to pregnancy and maternity; however, for the purposes of this EIA it is acknowledged that staff within the workforce may be pregnant, recently pregnant, or on maternity leave.</i></p> <p><i>Participation in any training activity, including practical scrap-car training, will be determined through an individual pregnancy risk assessment, carried out in line with LFB Policy 673 and with reference to PN 555 Family Support Leave (including Maternity) and PN 313 Maternity Provisions. These policies provide for appropriate workplace adjustments and outline the duty to support expectant mothers in remaining safe at work.</i></p> <p><i>We recognise that pregnancy can impact comfort, mobility, fatigue, and an individual's ability to perform both sedentary and physically demanding tasks. The risk-assessment process will therefore consider the guidance set out in the LFB Pregnancy – Possible Risks Guide, including sections on:</i></p> <ul style="list-style-type: none"> • <i>general precautionary measures</i> 	<input type="checkbox"/>	<input checked="" type="checkbox"/>



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			<ul style="list-style-type: none"> • <i>manual handling of loads and physical activity</i> • <i>extremes of heat and cold</i> • <i>movement, posture, and ergonomic requirements</i> <p><i>These resources support managers in identifying and implementing appropriate mitigating measures such as:</i></p> <ul style="list-style-type: none"> • <i>adapting or reducing physical activities</i> • <i>modifying or reallocating tasks</i> • <i>introducing additional rest breaks</i> • <i>providing alternative duties where required</i> <p><i>Where risk cannot be adequately mitigated, suitable alternative duties, including light duties, will be offered to ensure the safety and wellbeing of pregnant staff while maintaining access to the policy provisions.</i></p> <p><i>It is assessed that the supply and use of depolluted vehicles (scrap cars) does not disproportionately disadvantage staff who are pregnant or on maternity, as risks can be effectively managed through the established LFB risk-assessment process and the application of reasonable adjustments.</i></p> <p><i>Due regard has also been given to LFB's Health and Safety Policy PN 597, particularly section 4.30, which places responsibility on managers to assess and, where possible, eliminate or reduce risks to staff. The arrangements in place for the provision and use of depolluted</i></p>		
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			vehicles are considered sufficient to identify and mitigate pregnancy-related risks in line with this duty.		
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 formulating the provisions of The supply of depolluted vehicles (scrap cars) and its supporting material.</p> <p>It is considered that the policy provisions of The supply of depolluted vehicles (scrap cars) does not negatively disproportionately impact staff across different ethnicities.</p> <p>The breakdown of 4698 staff by race and ethnicity is - White: 4434 (79.10%), Under represented Minority Ethnic: 1096 (15.92%), Prefer not to say 71 (1.13%) and 239 (3.60%) not providing information.</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 <i>LFB Equity Policy</i> and the LFB <i>Inclusion Strategy</i> when formulating the provisions for the supply and use of depolluted vehicles (scrap cars).</p> <p>It is considered that the policy provisions do not disproportionately disadvantage staff of different religions or beliefs. LFB’s Inclusion Policies affirm the rights of staff to practise their religious observances without undue restriction, including the need for prayer, observance days, and other faith-related commitments.</p> <p>It is recognised that the timing of training and regulatory activities may occasionally coincide with religious observances—for example, fasting periods such as Ramadan,</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



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			<p>prayer times during the working day, or specific festival dates. These factors may have foreseeable impacts on an individual’s comfort, energy levels, concentration, or ability to undertake physically demanding tasks such as those involved in scrap-car training. To ensure staff are not disadvantaged on the basis of their religion or belief, managers will, where operationally feasible, consider reasonable adjustments, including but not limited to:</p> <ul style="list-style-type: none"> • scheduling training to avoid known fasting periods or religious duties where this can be achieved without operational impact; • allowing temporary adjustments to workload or task allocation for those who may be fasting or observing restricted dietary intake; • providing flexibility for prayer breaks or time-sensitive religious practices; • offering alternative training dates or participation formats if required. <p>These considerations form part of LFB’s broader commitment to creating an inclusive working environment where staff are supported to meet both their professional responsibilities and their religious obligations.</p> <p>Across the operational staff group, of 4698 staff members identify as Buddhist 62 (1.17%), Christian 1853 (30.01%), Hindu 52 (0.38%), Jewish 18 (0.32%), Muslim 128 (1.81%), Sikh 22 (0.23%), Other 179 (3.30%), No Religion 2388 (42.38%), Prefer not to say 205 (3.28%) and 933 (17.11%) Did not disclose</p>		
<p>Sex</p>	<p><input checked="" type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p>Due regard has been given to LFB Policy Note PN 973 <i>LFB Equity Policy</i> and the LFB <i>Inclusion Strategy</i> when formulating the provisions of PN 489. These policies emphasise the need to ensure all training, equipment, and operational procedures are inclusive and do not create unnecessary barriers based on sex.</p>	<p><input type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>



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			<p>It is considered that the policy provisions relating to the supply and use of depolluted vehicles (scrap cars) do not directly or disproportionately disadvantage staff based on sex. However, it is acknowledged that indirect impacts may arise where physical tasks are designed with implicit assumptions around stature, reach, hand size, grip strength, or upper-body strength. Such factors can affect how individuals of different sexes engage with manual tasks, tools, and vehicle-access activities during scrap-car training. To ensure equitable participation, training delivery will be inclusive by design, with instructors considering:</p> <ul style="list-style-type: none"> • task adaptations or alternative methods where height, reach, or grip requirements could disadvantage some participants; • the use of appropriately scaled tools or equipment where feasible; • flexible task allocation within teams to ensure learning without compromising safety; • attention to safe manual-handling technique rather than physical force as the primary method for achieving tasks. <p>Due regard has also been given to Policy Note 969 <i>Menopause Policy</i>. PN 969 sets out LFB’s responsibility to support staff experiencing menopause-related symptoms, which may include fatigue, heat sensitivity, pain, or reduced physical tolerance. Managers are expected to provide appropriate support and adjustments to ensure staff remain safe and able to engage meaningfully with training or alternative duties.</p> <p>It is considered that the provisions surrounding the supply of depolluted vehicles (scrap cars), and the associated training activities, contain no inherent gender restrictions and therefore do not exclude any staff on the basis of sex. By applying reasonable adjustments and inclusive task design, the activity supports equal opportunity for all genders and promotes positive working relationships across staff groups.</p> <p>The sex breakdown of 4698 staff is 493 (10.49%) female and 4205 (89.51%) male as a total</p>		
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			across all staffing groups.		
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 formulating the provisions of The supply of depolluted vehicles (scrap cars).</p> <p>It is considered that the policy provisions of The supply of depolluted vehicles (scrap cars) does not negatively disproportionately impact staff across different sexual orientation.</p> <p>Total number of operational staff making up workforce = 4698 Heterosexual 4233 (71.88%), LGB 367 (6.09%), 165 (2.92%) preferred not to say and 1075(18.41%) have not provided information.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 formulating the provisions of The supply of depolluted vehicles (scrap cars) and its supporting material. It is considered that the policy provisions of The supply of depolluted vehicles (scrap cars) have 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 to LFB Policy Note PN 448 “Working with Choice” when formulating the provisions of The supply of depolluted vehicles (scrap cars) and its supporting material. The supply of depolluted vehicles (scrap cars) allows flexibility around working hours and would cover care responsibilities.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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		It is considered that the policy provisions of The supply of depolluted vehicles (scrap cars) have no restrictions on staff with caring responsibilities.		
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Explain why a full EIA is not required:

I don't believe a full EIA is required as The supply of depolluted vehicles (scrap cars) relates to current operational activity, there is already a policy and therefore an EIA that covers impacts and mitigation to staff groups within the operational arena. The policy has also been reviewed for any external impacts, including contractors delivering or collecting vehicles and visitors or members of the public on site. All established risk controls and safety measures apply equally to external parties to ensure consistent and appropriate protection for everyone present.

It is recognised that individuals may have **overlapping protected characteristics**—for example, age and disability, ethnicity and low income, or sex and caring responsibilities—which may combine to create additional or compounded barriers in accessing work activities, including practical scrap-car training. These intersecting factors can influence physical capability, confidence, access to support, or the ability to participate fully in training.

Managers will remain mindful of these interacting impacts when applying policy provisions, assessing risk, or implementing reasonable adjustments. All decisions will be made on an individual basis, ensuring that staff with multiple or intersecting characteristics receive fair, proportionate, and inclusive support to enable safe and equitable participation.

Examples of Existing Mitigations Already Embedded in Policy 843

- 1. Environmental protection and pollution-control measures**
- The policy already includes explicit mitigations to prevent environmental harm during storage and use of depolluted vehicles. For example:
- Scrap vehicles **must not be stored over or within 5 metres of a drain**, and where this cannot be avoided, **impermeable drain mats must be used** (Section 6.11).



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- Stations must identify the location of the nearest **spill kit**, and all spillages (including near misses) must be reported in accordance with Policy 368 (Sections 6.11 and 6.13).

These measures directly mitigate environmental risks and ensure compliance with environmental regulations.

2. Controls on safe storage and site capacity

The policy contains built-in controls to limit risk arising from overcrowding or unsafe accumulation of vehicles:

- No more than ten (10) scrap vehicles may be stored on a site at any time** to meet environmental regulatory requirements (Section 6.12).
- Stations using shared premises must **coordinate to ensure this limit is never exceeded**. This acts as a mitigation against fire loading, environmental exposure, and unsafe training environments.

3. Safety and suitability checks on delivery *(optional third example if you need more)*

The policy requires that:

- A visual inspection is carried out **before any training use** to confirm the vehicle has been properly de-polluted (Section 5.12).
- If a vehicle is unsuitable, it must be **rejected and replaced within 24 hours** (Section 5.14). These controls reduce risks associated with hazardous residues, unsafe structures, and unsuitable training resources.

Signed by the Submitter

Name: Matt Jones

Rank/Grade: Station Commander

Date: 13/02/26

Email the completed form to EqualityImpactAssessment@london-fire.gov.uk



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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

Full EIA required for affected characteristic before proceeding further

Adverse impact(s) identified

Next steps

No further action required

Name: Tanya Wijesinghe

Date: 20/02/2026

Amendments Post Sign Off



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