

Appendix 2

Equality Impact Assessment (EIA) Form

The **purpose** of an EIA is to give **as much information as possible** about potential equality impacts, to demonstrate we meet our **legal duties** under the Equality Act 2010.

Please read the EIA Guidance [on Hotwire](#) before completing this form.

1. What is the name of the policy, project, decision or activity?

Interest-free loans for ULEZ-compliant vehicles for station-based staff who undertake standbys.

Overall Equality Impact of this policy, project, decision or activity (*see instructions at end of EIA to complete*):

High		Medium		Low	✓
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2. Contact details

Name of EIA author	Dominic Johnson
Department and Team	People Services; HR Advice & Employee Relations
Date of EIA	23/07/2021

3. Aim and Purpose

What is the aim and purpose of the policy, project, decision or activity?	The aim is to provide interest-free loans to station-based staff who undertake standbys, to enable them to purchase a ULEZ-compliant vehicle. This is in light of the expansion of the ULEZ area on 25/10/2021: driving within the ULEZ incurs a daily £12.50 charge if the vehicle does not meet ULEZ emissions standards.
Who is affected by this work (all staff, specific department, wider communities?)	Station-based staff who undertake standbys, specifically those who currently drive to work in a non-ULEZ compliant vehicle.

4. Equality considerations: the EIA must be based on evidence and information.

What consultation has taken place to support you to predict the equality impacts of this work?	This initiative has come out of the work of a stakeholder group involving reps from Sustainable Development, Operations, Communications, People Services and the FBU. This led to a survey of all station-based staff in May 2021 which has directly informed this initiative.
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5. Assessing Equality Impacts

Use this section to record the impact this policy, project, decision or activity might have on people who have characteristics which are protected by the Equality Act.

Protected Characteristic	Impact: positive, neutral or adverse	Reason for the impact	What information have you used to come to this conclusion?															
Example: Age	Adverse	Moving this service online will adversely affect older people, who are least likely to have access to a computer or smart phone and may not be able to use the new service.	GLA Datastore: X% of the London community are aged 70 or over. GLA data shows that only 10% of those over the age of 70 have regular access to a computer or smart phone.															
Age (younger, older or particular age group)	Positive	There is a positive impact for all those who will be eligible for the interest-free loan, as this will be an additional employee benefit which can potentially mitigate the adverse impact of the expansion of the ULEZ area. The age profile of those operational staff who will potentially be eligible for the loan, station-based staff who undertake standbys, hence FF, LFF and SubOs, is broadly similar to the age profile of all operational staff, but slightly younger.	As at 20/07/2021, the age profile for all operational staff, and those potentially eligible for the loan (FFs, LFFs, SubOs on station), is as follows: <table><tr><td>Age range</td><td>All operational staff</td><td>Operational staff potentially eligible for the loan</td></tr><tr><td>Up to 30</td><td>13.9%</td><td>15.9%</td></tr><tr><td>31-40</td><td>33.5%</td><td>36.1%</td></tr><tr><td>41-50</td><td>37.7%</td><td>35.4%</td></tr><tr><td>51+</td><td>14.9%</td><td>12.6%</td></tr></table>	Age range	All operational staff	Operational staff potentially eligible for the loan	Up to 30	13.9%	15.9%	31-40	33.5%	36.1%	41-50	37.7%	35.4%	51+	14.9%	12.6%
Age range	All operational staff	Operational staff potentially eligible for the loan																
Up to 30	13.9%	15.9%																
31-40	33.5%	36.1%																
41-50	37.7%	35.4%																
51+	14.9%	12.6%																
Disability	Positive	As above, there is a positive impact for all those who will be eligible for the interest-free loan as this will be an additional employee benefit. This will particularly benefit	As at 30/06/2021, the percentage of all operational staff who have a disability, as self-declared, is 6.3%. The percentage of operational															



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(physical, sensory, mental health, learning disability, long term illness, hidden)		staff who have a disability which means that driving to work is a better option for them. The percentage of those operational staff who will potentially be eligible for the loan who have a disability is slightly lower than amongst operational staff as a whole.	staff potentially eligible for the loan who have a disability is 5.8%															
Gender reassignment (someone proposing to/undergoing/ undergone a transition from one gender to another)	Positive	As above, there is a positive impact for all those who will be eligible for the interest-free loan as this will be an additional employee benefit.	No staffing data in relation to this protected characteristic is included.															
Marriage / Civil Partnership (married as well as same-sex couples)	Positive	As above, there is a positive impact for all those who will be eligible for the interest-free loan as this will be an additional employee benefit.	No staffing data in relation to this protected characteristic is included.															
Pregnancy and Maternity	Positive	As above, there is a positive impact for all those who will be eligible for the interest-free loan as this will be an additional employee benefit.	No staffing data in relation to this protected characteristic is included.															
Race (including nationality, colour, national and/or ethnic origins)	Positive	As above, there is a positive impact for all those who will be eligible for the interest-free loan as this will be an additional employee benefit. The percentages of staff who are black, Asian or from other ethnic minorities; white; whose race is not known or who prefer not to say, is broadly similar for all operational staff compared to those operational staff who will be potentially eligible for the loan.	As at 30/06/2021, the ethnicity profile of all operational staff, and those operational staff potentially eligible for the loan, is as follows: <table><tr><td>Ethnicity</td><td>All operational staff</td><td>Operational staff potentially eligible for the loan</td></tr><tr><td>Black, Asian and other ethnic minorities</td><td>14.4%</td><td>15.0%</td></tr><tr><td>White</td><td>83.6%</td><td>83.2%</td></tr><tr><td>Not Known</td><td>1.7%</td><td>1.6%</td></tr><tr><td>Prefer not to say</td><td>0.3%</td><td>0.2%</td></tr></table>	Ethnicity	All operational staff	Operational staff potentially eligible for the loan	Black, Asian and other ethnic minorities	14.4%	15.0%	White	83.6%	83.2%	Not Known	1.7%	1.6%	Prefer not to say	0.3%	0.2%
Ethnicity	All operational staff	Operational staff potentially eligible for the loan																
Black, Asian and other ethnic minorities	14.4%	15.0%																
White	83.6%	83.2%																
Not Known	1.7%	1.6%																
Prefer not to say	0.3%	0.2%																
Religion or Belief (people of any religion, or no religion, or people who follow a particular belief) (not political)	Positive	As above, there is a positive impact for all those who will be eligible for the interest-free loan as this will be an additional employee benefit.	No staffing data in relation to this protected characteristic is included.															



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Sex (men and women)	Positive	As above, there is a positive impact for all those who will be eligible for the interest-free loan as this will be an additional employee benefit. The percentages of staff who are female/male is broadly similar for all operational staff compared to those operational staff who will be potentially eligible for the loan.	As at 30/06/2021, the gender profile of all operational staff, and those operational staff potentially eligible for the loan, is as follows: <table><tr><td>Gender</td><td>All operational staff</td><td>Operational staff potentially eligible for the loan</td></tr><tr><td>Female</td><td>9.0%</td><td>9.2%</td></tr><tr><td>Male</td><td>91.0%</td><td>90.8%</td></tr></table>	Gender	All operational staff	Operational staff potentially eligible for the loan	Female	9.0%	9.2%	Male	91.0%	90.8%
Gender	All operational staff	Operational staff potentially eligible for the loan										
Female	9.0%	9.2%										
Male	91.0%	90.8%										
Sexual Orientation (straight, bi, gay and lesbian people)	Positive	As above, there is a positive impact for all those who will be eligible for the interest-free loan as this will be an additional employee benefit. The percentage of those operational staff who will potentially be eligible for the loan who are lesbian, gay or bisexual is broadly similar to the percentage amongst operational staff as a whole.	As at 30/06/2021, the percentage of all operational staff who are lesbian, gay or bisexual, as self-declared, is 5.6%. The percentage of operational staff potentially eligible for the loan who are lesbian, gay or bisexual, is 5.7%									

6. Impacts outside the Equality Act 2010

What other groups might be affected by this policy, project, decision or activity?

Consider the impact on: carers, non-binary people, people with learning difficulties, neurodiverse people, people with dyslexia, autism, care leavers, ex-offenders, people living in areas of disadvantage, homeless people, people on low income / in poverty.

There is a positive impact in introducing an interest-free loan scheme for those on low incomes who wish to switch to a ULEZ-compliant vehicle, but are unable to afford this outright, or who would be disadvantaged by paying interest on a loan to purchase such a vehicle.

7. Legal duties under the Public Sector Equality Duty (s149 Equality Act 2010)

How does this work help LFB to:

Eliminate discrimination?

By offering an interest-free loan to station-based staff who currently drive to work and undertake standbys in a non-ULEZ-compliant vehicle, to assist them to purchase a ULEZ-compliant vehicle, this will mitigate against the disadvantage they face when the ULEZ expands on 25 October 2021 when they will face £12.50 daily charges if they wish to continue driving to work. The loan will enable these staff to avoid these charges, and will therefore mitigate against the adverse impact from the



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	ULEZ expansion. It is accepted that this is not in respect of a protected characteristic; the potential adverse impact arises from being a member of staff required to undertake standbys.
Advance equality of opportunity between different groups?	There are station-based staff who already drive ULEZ-compliant vehicles and therefore face no adverse impact from the ULEZ expansion. The interest-free loan has the potential to eliminate the adverse impact of ULEZ expansion for those station-based staff who currently drive non-ULEZ compliant vehicles, and therefore to put these staff on the same footing.
Foster good relations between different groups?	See above. The more staff who can be offered opportunities, through initiatives such as this, to avoid paying the ULEZ charge when the ULEZ expands on 25/10/2021, the less resentment this will cause for those staff who currently face paying the charge on a regular basis from this date.

8. Mitigating and justifying impacts

Where an **adverse** impact has been identified, what steps are being taken to **mitigate** it? If you're unable to mitigate it, is it **justified**?

Characteristic with potential adverse impact (e.g. age, disability)	Action being taken to mitigate or justify	Lead person responsible for action
N/a		

Now complete the RAG rating at the top of page 1:

High: as a result of this EIA there is evidence of significant adverse impact. This activity should be stopped until further work is done to mitigate the impact.

Medium: as a result of this EIA there is potential adverse impact against one or more groups. The risk of impact may be removed or reduced by implementing the actions identified in box 8 above.

Low: as a result of this EIA there are no adverse impacts predicted. No further actions are recommended at this stage.