



LONDON FIRE BRIGADE

Report title

LFB Training Centre Croydon

Report to	Date
People Board	22 April 2021
Commissioner's Board	5 May 2021
Deputy Mayor's Fire and Resilience Board	8 June 2021
London Fire Commissioner	

Report by	Report number
Assistant Director, Training and Professional Development	LFC-0521y

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I agree the recommended decision below.

Andy Roe
London Fire Commissioner

Date **This decision was remotely signed on 18 June 2021**

Executive Summary

This report provides an update on the London Fire Brigade Training Centre Croydon Project and details the numerous issues that have impacted on the project. A key change is the high-rise training requirement which has emerged since the project commenced which has resulted in the specification of a new Urban Firefighting course. This course is expected to require a facility that can vent real fire and smoke to air which the proposed facility at Croydon is unable to accommodate. The changes to the design and layout of the proposed facility have impacted on the cost beyond the budget envelope. These changes in design, technological advancement and affordability are set out in the report, resulting in the recommendation that the project is discontinued.

Recommended decisions

That the London Fire Commissioner:

1. Approves the discontinuation of the LFB Training Centre Project.

2. Approves a draw on the budget flexibility reserve of £968K to meet the abortive capital costs, which will be transferred to revenue.

Introduction and Background

1. On 12 November 2015, the London Fire and Emergency Planning Authority (LFEPA) Resources Committee approved a budget to fund the construction of a dedicated training facility in South London using capital receipts generated through the sale of former fire stations (FEP2520). At the time £8.5m was allocated to the project.
2. On 16 September 2016 LFEPA Resources Committee approved the build of a new training centre at Croydon subject to costs not exceeding that contained in the report (FEP2646 and FEP 2646X) and subject to full and robust consultation as part of the planning process. At that time the estimated cost was £11.1m for the design and construction, with £621k per year for maintenance costs.
3. The aim and scope of the project was to:
 - provide a training facility in South London;
 - provide a six-storey high rise carbonaceous fire house;
 - deliver line operations Level 3 training; and
 - enhance the incident command training capability.
4. At the time the benefits were reported as:
 - The LFB owning its own training facility: at the time there were (and still are) two training centres one at Beckton and one at Park Royal which are owned by Babcock International Limited, the LFC's training provider.
 - Closing the high-rise training gap: fires in high-rise buildings present a wide variety of hazards for firefighters. A combination of their height, potential complex layout and fire-engineered design can present a wide range, and unique set, of operational challenges when a fire does occur. Given the large number of tall buildings in London and the amount of new high-rise buildings that were either in the planning and/or construction phase at the time, it was considered important therefore that the Brigade could demonstrate that its firefighters have been adequately prepared and are competent in role. There was and still is a need for a more realistic training environment to enable firefighters to maintain requisite competencies.
 - Reducing delegates' travel and subsistence costs: by having a training centre in South London delegates based at fire stations and locations or live in South London would not necessarily need to travel to Beckton and Park Royal in the East and West of London respectively.
 - Responding to staff feedback about excessive travel: travel to the two existing training facilities has a detrimental impact on those with caring and childminding commitments; and

- Increasing capacity for real fire training and incident command: training over three purpose built/modern sites will enable third party income opportunities.
5. On 21 July 2017, a meeting of the LFEPa Resources Committee approved report FEP2759, which increased the approved project cost ceiling to £16.275m (which included a five per cent contingency tolerance). This increased the budget from £11.1m to £15.5m. The reason for the cost increase was due to the original estimate having been based on the square metre rate of a notional building and the revised cost plan was based on a more developed design, which utilised more relevant and accurate costs. The running and maintenance cost budget was not amended and remained at £621k per annum.
 6. Reference to this project was included in the London Safety Plan 2017 (LSP) where it was stated that:
"The Brigade will commission and, subject to consultation and planning permission, deliver, a third training centre at Croydon so that the Brigade has the capacity to train and develop its staff to the highest standards. This will provide London Fire Brigade with a high-rise real fire training facility that will simulate the conditions that firefighters may experience when responding to incidents at complex buildings, such as residential high-rise properties."
 7. On 4 December 2019 the LFC considered an update on the project and seeking reconfirmation of the approval previously given by the LFEPa Resources Committee, to proceed with the project. Reconfirmation was sought as the project had progressed to the end of RIBA stage 2, further public consultation had taken place, and at that time there was greater certainty around the project programme and cost, LFB Training Centre Croydon - Update LFC-0275.

Challenges

8. Since the project's inception, the project has encountered a number of challenges as set out below:
 - (i) The original scheme planned to demolish the existing Protective Equipment Group (PEG) building and ramp and a brand-new training centre would be provided. Following work conducted by the project management team and architects, the costs for this proposal along with a new real fire training venue (RFTV) resulted in a higher cost than the budget and so the concept of a new build was not pursued. In late 2018 a new feasibility was completed by a new project management team, designers and cost consultants. This proposed re-using the PEG building and having the RFTV as a new build. The estimated cost came within budget, so the design process was restarted on this option.
 - (ii) The change in design meant repeated engagement with the council planning department and design consultants which impacted on cost.
 - (iii) The Croydon Council Review Panel determined that the drill tower was of local historical interest and should be retained but the design at the time relied on the old drill tower being demolished. The drill tower subsequently obtained Grade II listing status by Historic England. Therefore, in consultation with Croydon Planners, the design was amended to accommodate the retention of the drill tower which in turn resulted in the proposed RFTV being relocated.

- (iv) Design changes meant that the site layout around the RFTV including supporting outbuildings and all the services and reports that had been produced by specialist consultants had to be re-done. Both the redesign and the resulting proposals increased the projected spend for the project. A number of extensive value engineering exercises took place throughout the project which considered the removal of a range of items that would not compromise the end user requirement. Despite these exercises, the current cost plan stood at £16.9m when the project was put on hold at the end of June 2020. This is above the allocated budget and tolerance.
- (v) The high-rise training requirement has changed since the inception of the project, with new learning objectives being specified on a range of new firefighting techniques (see paragraph 9 cons). The LFB's Operational Policy and Assurance (OPA) Department is currently specifying a revised 'Fighting Fires Training Strategy' which includes amongst other elements a new Urban Firefighting training course which is expected to require facilities that require venting real fire and smoke directly to air. This requirement cannot be provided in London. Consequently, the proposed Croydon training facility is unable to provide the facilities for all of the elements of the course. This new training strategy and Urban Firefighting course are still in the design process and are yet to be costed and procured. Therefore, there will be new costs to the Brigade's training budget from 2022 onwards.

Alternative Options Considered and Consultation

9. A Strengths, Weaknesses, Opportunities, Threats (SWOT) analysis was conducted in conjunction with officers from the Property, OPA and Training and Professional Development departments to identify the pros and cons of continuing the project. These are set out in Table 1 below.

Table 1 – SWOT Analysis

Pros	<p><u>Property related</u></p> <p>Croydon has excellent transport links making it easy to access. The location will reduce travelling time for firefighters who live in southern regions or are located at fire stations in south London.</p> <p>Building a third training centre in the south of London on LFB land would give resilience should anything happen to the current training contract with Babcock International Limited or training demand, although such an eventually seems unlikely.</p> <p>Utilising existing buildings on site will provide a new purpose for a built asset that would otherwise be vacant following the relocation of Protective Equipment Group to the Operations Support Centre.</p> <p>The site is served by gas, power and water well enough to not require further enhancement to the local network by the LFB. Other sites where this is not possible would incur significant costs.</p> <p><u>Training related</u></p>
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	<p>The stairwell, firefighting lift, lobbies and corridor layout of the proposed venue at Croydon will provide firefighters with a venue to practise initial tactics at high-rise incidents. Instructors will be able to explain and demonstrate the concept of compartmentation and the effect that firefighting actions and smoke travel can have on conditions within the stairwell, lobbies and corridors using cosmetic smoke. The remainder of the proposed 8 burn rooms across 4 floors (simulating flats and maisonettes) will have real fire and smoke conditions. However, it must be noted that because of the size of the building, this learning will be through a small focus and not reflective of the size and complexity of high-rise buildings.</p> <p>The facility would add some value and will also be able to deliver elements of high-rise firefighting training and be able to replicate elements of internal structures, subject to some adjustments, but it cannot replicate all the challenges of scale; logistics; communications; travel distances and fire behaviour.</p> <p>The facility will also be able to deliver core skills training around search techniques, door procedure, stair procedure and controlling fire gases.</p>
Cons	<p><u>Training related</u></p> <p>The 'Fighting Fires Training Strategy' being developed by OPA is based around the National Operational Guidance (NOG) training framework for fires and firefighting, which is the industry standard. The gap analysis of the practical application elements of this framework has identified a range of tactics and techniques which cannot be fully demonstrated at the proposed venue. This is primarily as a result of a lack of scale and complexity and an inability to vent to open air and set realistic and challenging fire conditions. The detail of this gap analysis is available separately.</p> <p>The Urban Firefighting course will ensure that with the other training elements we meet the NOG requirements, and focus on delivering a challenging and realistic training experience which revolves around the understanding of flow paths in real fire environments and the interpreting fire behaviour in decision making. It will also include positive pressure ventilation, which would not be possible at the proposed venue. OPA advise that the proposed facility at Croydon will <u>not</u> be able to fully deliver the practical application elements of the following learning outcomes:</p> <ul style="list-style-type: none"> ● fire in roofs and voids (including the use of lance technology) ● anti-ventilation techniques ● weight of attack ● firebreaks ● backdraft and flashover ● isolated fire gases ● covering jets, ● method of entry with fire compartments ● floor below branch

	<ul style="list-style-type: none"> • understanding fire behaviours as part of scene survey and using it to adjust firefighting tactics • understanding ventilation and flow paths <p>The LFB's requirement for high-rise has also changed since 2015. The latter five bullet points relate to the LFB's high-rise policies which have been changed as a result of the Grenfell Tower fire, and these headlines concern a broad section of the policy.</p> <p>Given the importance of training in the implementation of the new high-rise policies, it is important that crews are training in real fire environments that reflect the complexity of high-rise compartments. This is not possible in London due to environmental limitations and restrictions. Consequently, the Urban Firefighting course will need to be delivered outside of London and will incur travel and subsistence costs as well as the cost of the new training course provision itself.</p> <p>The issue of excessive travel will still remain with the associated detrimental impact on those with caring and childminding commitments. It is also impossible at this stage to project what the duration and cost of the Urban Firefighting course is likely to be. This will be the subject of a paper brought forward by OPA. By discontinuing the build, savings could be used to find appropriate training facilities going forward.</p> <p><u>Property related</u></p> <p>Extensive pre-application process was undertaken to engage the local planners. However, there remains the risk the planners could amend their position on submission of the planning application, especially given the decision to list the drill tower causing the project to be redesigned.</p> <p><u>Cost related</u></p> <p>Over the course of the design development costs have continued to increase due to the challenges experienced. To date the capital spend on the project totals £968k and the last cost plan stood at £16.9m. This is over the agreed budget and the upper tolerance level.</p>
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Objectives and Expected Outcomes

10. Table 2 below illustrates whether the facility as it is currently designed will be able to deliver the benefits on which the project was originally approved.

Table 2 – Benefits Realisation

Benefit	Benefit met?	Comment
1. The LFB owning its own training facility	In full	

2. Closing the high-rise training gap	Partially met	As detailed above, the Croydon facility could provide firefighters with a venue to practice initial tactics at high-rise incidents but not all of the learning objectives of a new Urban Firefighting course which revolves around the use of positive pressure ventilation and focuses on improving understanding of flow paths in real fire environments.
3. Reducing delegates' travel and subsistence costs	Partially met	The facility could not cater for the full range of training so delegates in the south would still need to travel to Beckton for some specialist courses e.g., urban search and rescue.
4. Responding to staff feedback that excessive travel to the two existing training facilities has a detrimental impact on those with caring and childminding commitments	Partially met	The facility could not cater for the full range of training so delegates in the south would still need to travel to Beckton for some specialist courses e.g., urban search and rescue.
5. Increasing capacity for real fire training and incident command training over three purpose built/modern sites will enable third party income opportunities	Potential, but no market testing available	Babcock have not conducted detailed market testing relating to potential third-party income, but they anticipate an appetite to use the facility for third party Breathing Apparatus (BA) training. However, no estimate has been provided for this potential income, and it is not therefore reflected in budget figures.

Stakeholder impact

- There has been engagement with local stakeholders and the community on the plans for the Croydon Training Centre. Consultation meetings were held in November 2017, attended by local residents and politicians and a further consultation event took place on 6 November 2019. Feedback at these events were positive with no objections being raised.

12. Local MPs and councillors were kept informed of the plans as they developed. As well as the planning proposals themselves, information about the benefits of the scheme to the LFB, including increasing training capacity, were shared.
13. If the recommendation is agreed to discontinue the project up to date information to those the LFB have engaged with previously will need to be provided together with the reasons for discontinuing the project to both external and internal stakeholders.
14. Babcock have also been consulted about the potential discontinuation of the project and have acknowledged the position.

Conclusion

15. Whilst, the LFB Training Centre at Croydon would have met the objectives specified in September 2016, since that time the training requirements for high-rise have changed and the Croydon facility is no longer able to deliver the additional learning objectives and the step change that is needed to equip our staff to respond to the technological and technical advances in urban firefighting.
16. In order to meet the new learning objective, a training facility outside of London that can deliver and meet the course objectives will need to be secured.
17. In addition to the changes in the training requirement, the project design has also changed which means the project is unaffordable, despite numerous value engineering exercises.
18. An incident command facility in the south of London will be available once the estate at the London Operations Centre at Merton has been adapted. A schedule of works is currently being considered with a completion date of September 2021.
19. As already stated, to date the total capital spend on this project is £968k. Having considered the training, property and commercial aspects of the project, it is recommended that the LFB Croydon training centre project is discontinued as it no longer presents value for money nor is it able to deliver the requirements for high-rise training. This decision will realise a capital saving of £15.5m together with revenue savings of £621k per annum which were set aside for anticipated running costs.
20. The need for this facility will be included in the training specification for the proposed Urban Firefighting course. It is anticipated that this course will require significant investment as well as budgetary provision being made available to fund expenses for delegate's travel and subsistence. The proposed facility at Croydon does not feature in the future training plan.

Equalities implications

21. The London Fire Commissioner and decision takers are required to have due regard to the Public Sector Equality Duty (s149 of the Equality Act 2010) when exercising our functions and taking decisions.

22. 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.
23. 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.
24. The Public Sector Equality Duty requires us, in the exercise of all our functions (i.e., everything we do), to have due regard to the need to:
- (a) Eliminate discrimination, harassment and victimisation and other prohibited conduct.
 - (b) Advance equality of opportunity between people who share a relevant protected characteristic and persons who do not share it.
 - (c) Foster good relations between people who share a relevant protected characteristic and persons who do not share it.
25. 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:
- (a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic where those disadvantages are connected to that characteristic;
 - (b) 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;
 - (c) 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.
26. 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.
27. 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—
- (a) tackle prejudice, and
 - (b) promote understanding.
28. An initial Equality Impact Assessment (EIA) was completed in November 2019. However, given the current position and the content of this report, a further EIA has been completed (see Appendix 1 attached to this report).

29. If the decision is taken to discontinue the project, it is anticipated that there will be a neutral impact in the areas of age, disability, gender reassignment, marriage/civil partnership, pregnancy & maternity, race, religion & belief, and sexual orientation. In the area of sex it is anticipated that there is likely to be a negative impact for staff who either live in or are based at locations in the South in terms of travel to the existing training centres in the West and East of London. Whilst it may impact all those staff, it may have more of an impact for women, who disproportionately are carers and have the majority of parenting and care responsibilities. Staff had previously raised concerns about the excessive travel distances currently required to travel to Beckton and Park Royal, and the detrimental impact this has on their welfare and childcare responsibilities could continue.
30. Training of operational staff will continue using the existing facilities primarily at Beckton and Park Royal based on current requirements and need, and LFB will continue to provide a good service to local communities i.e. continue to deliver an operational response in accordance with statutory requirements. As part of the training and commissioning and design process a range of delivery methods will be considered for the new Urban Firefighting course in order to minimise the impact. However, as the new Urban Firefighting course is developed and when a training provider outside of London is secured, it is likely to be residential. Since the training will likely involve practical exercises in a venue outside London it will not be able to be delivered in another format (e.g. virtually) in order to mitigate the potential negative impact identified above.
31. Having properly considered the duties under the Equality Act 2010 and the impact upon particular groups the LFC is nevertheless able to take into account other factors when reaching a decision, and to proceed with the proposal where there is good reason to do so. In this matter the relevant factors are the limitations of the venue in light of the current training need and the financial implications as described above.
32. There will, however, be an incident command facility south of London (Merton) when completed, and we will continue to consult with relevant staff groups to identify how we can mitigate any impacts further. On a more general note, officers will continue to give thought and consideration to greater accessibility to more training at fire stations.

Procurement and Sustainability

33. There will be no procurement issues apart from terminating the current contact with Fulkers Bailey Russell, who are the consultant and architectural company engaged on assisting and advising on project. There are no termination costs to sever this contract. Although no official notice period is required, it would be reasonable to give Fulkers Bailey Russell 30-day notice.
34. As noted in the report, if the project is discontinued this will result in additional travel required for staff, resulting in increased carbon emissions.
35. Due to environmental requirements and restrictions in London, it is not possible for a proposed training facility to vent real fire and smoke to air. As detailed in this report, this venue would need to be situated outside of London.

Strategic Drivers

36. The Transformation Development Plan sets the aspiration for Seizing the Future. As already set out in this report, LFB will need to secure appropriate training facilities capable of delivering the future Urban Firefighting course. Although that course is yet to be designed, it will require

facilities which include venting to air which the facilities at the proposed Croydon training centre will not be able to deliver in full. Therefore, it is seizing the future by recommending the discontinuing the build from which some of the savings could be diverted to finding appropriate training facilities going forward.

Workforce Impact

37. If the project is discontinued, LFB staff will continue to be trained at the two Babcock-owned training centres at Beckton and Park Royal for the remainder of the contract which is due to expire on 31 March 2037. However, in order to train LFB operational personnel in all aspects of the forthcoming Urban Firefighter course, there will be a need to buy courses from an external provider for either full or part delivery of the course. This will be outside of London and staff will need to travel and may need to reside at the training venue that is secured to deliver the course. This will have cost implications.
38. The Fire Brigades Union and the Fire Officers Association have been kept advised of developments with regard to the project on a monthly basis, at the Training Liaison Meeting. No comments have been received regarding discontinuing the project.

Finance comments

39. This report recommends that the Training Centre Project is discontinued. The 2021/22 Budget Report included a capital budget for the Training Centre of £15.5m and an ongoing revenue budget of £621k.
40. This report notes that capital spend on the project so far totals £968k, which will become abortive costs on the cancellation of the training centre project and therefore would be transferred from capital to revenue expenditure. This additional revenue cost will be charged to the 2021/22 financial year, to reflect the point the cancellation decision is made, and will be reported on as part of the regular financial position reporting. This cost will be funded from the budget flexibility reserve, which was established to help support the budget in the medium term to enable organisational change, which aligns with this proposal. This will reduce the anticipated balance on the budget flexibility reserve from £19,203k as at the end of 2020/21 to £18,234k. The only existing planned draw on the reserve is for £800k in 2021/22, as a result the proposed draw of £968k will not have any further financial impacts.
41. The discontinuation of this project will result in a saving to the capital programme of £15.5m, including the £968k spent on the project so far as well as the avoidance of capital expenditure that had previously been budgeted for the 2021/22 and 2022/23 financial years. The capital programme includes a requirement for borrowing, and the reduction in capital spend will reduce the revenue requirements to meet the costs of repaying the principal of the debt and annual interest while this remained outstanding. Any savings will be considered and reported on as part of the budget process for future years.
42. The discontinuation of the project will also result in revenue savings against anticipated running costs of £446k in 2022/23 increasing to £621k from 2023/24, which will also be reported on as part of the budget process for future years.

Legal comments

43. "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.

44. Section 1 of the Fire and Rescue Services Act 2004 (the "2004 Act") states that the Commissioner is the fire and rescue authority for Greater London. Section 7(2)(b) of the 2004 Act states that the Commissioner must "secure the provision of training for personnel" for the purposes of extinguishing fires and protecting life and property.
45. The Fire and Rescue National Framework for England ("Framework") issued by the Secretary of State under section 21 of the Fire and Rescue Services Act 2004 requires the Commissioner to have regard to the Framework in carrying out his functions. The Framework includes provision for the assessment of risk and the preparation, review and revision of the Integrated Risk Management Plan, namely the London Safety Plan 2017 (LSP2017).
46. LSP2017 included a reference to developing Croydon, '*subject to planning permission*', into a third training centre which would '*provide London Fire Brigade with a high-rise real fire training facility that will simulate the conditions that firefighters may experience when responding to incidents at complex buildings, such as residential high-rise properties*'. The report sets out that planning constraints imposed on Greater London as a whole do not permit real fire and smoke venting to occur from a training venue, making it no longer possible to develop the site to allow it to fulfil its original strategic intent, i.e. high-rise real fire training. The report goes on to explain the remaining options for development of the site.
47. The inclusion of the Croydon Training proposal in the LSP2017, subject to 'conditions' including suitable planning permission, is therefore only one factor to be considered when coming to a decision on the future development of the Croydon Training facility. Other factors are set out in detail in the report. In coming to a final decision in this matter the factors in the report should be considered in the round.
48. The Commissioner is advised that if he agrees to the recommendation in this report to discontinue the LFB Training Centre Croydon Project, this will not constitute neither a revision or publication of the LSP which requires approval of the Mayor and the Assembly per section 327(G) Greater London Authority Act 1999, nor a material change to the LSP which would engage the requirements of the Framework. This advice is given on the following basis; firstly, the intention to develop Croydon in LSP2017 was stated explicitly to be conditional on receiving the required planning permission, this has not been achievable in practice thus limiting the ability of the site to provide the intended benefits set out in LSP2017; secondly, consequent on the first point, the Commissioner does not intend to amend (revise) or publish a further LSP following this decision meaning neither the requirements of 327(G) or the Framework are met; thirdly, the strategic aims of the Commissioner and statutory duties upon him, to provide training, will be unaffected by the decision to discontinue development of Croydon with further work continuing to ensure these are achievable by alternate means; finally, the Fire Brigades Union and the Fire Officers Association have been kept advised of developments with regard to the project.
49. Under section 327D of the GLA 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. By direction dated 1 April 2018, the Mayor set out those matters for which the Commissioner would require the prior approval of or consultation with either the Mayor or the Deputy Mayor for Fire and Resilience (the "Deputy Mayor"). Under paragraph 3.1 of that Direction, the Commissioner is required to consult with the Deputy Mayor on anything considered "novel, contentious or repercussive in nature". The

discontinuance of this new training centre departs from the course of action previously envisaged as set out in LSP2017.

50. Additionally, finance have confirmed in their comments that a decision to cancel the training centre means that capital costs incurred to date on the project becomes 'abortive costs' and must therefore be reclassified as revenue costs in our accounts. This does not constitute an expenditure under the Mayoral Direction as no monies are being expended and the previous costs, which are now reclassified, have previously been agreed in accordance with the LFC's scheme of governance and Mayoral Direction.

List of Appendices

Appendix	Title	Protective Marking
1.	Equality Impact Assessment	

Standard Equality Impact Assessment Form

Question 1: Which Team, Department, or Project Board is responsible for carrying out the Standard Equality Impact Assessment?

Name **Training and Professional Development (T&PD) Department**

Question 2: Lead assessor's contact details

Name	Jackie Adams-Bonitto	Mobile No	07766768695
Job title	Head of Corporate Training	Extension	30487
Department	T&PD	Email	jackie.adamsbonitto@london-fire.gov.uk

Question 3: Title of / policy (please include the policy number) / project / report / proposed change / initiative / decision

LFB Training Centre Croydon Project

Question 4: Is the work...

New		A complete redesign	
A small change or policy review		Other (e.g. reviewed as current)	X Review of project with a view to discontinuing it

Question 5: Briefly outline the aim and the purpose of the work

Aim	The original intention was to design and construct a new LFB training centre in Croydon. Current position is a recommendation to discontinue the project.
Purpose	The original purpose was for the new training centre to deliver the following benefits: <ul style="list-style-type: none"> • Provide a six storey high rise carbonaceous training facility that increases real fire training capacity. • Provide a training facility in south London, thereby reducing delegate travel time for staff based at fire stations / workplaces that are closer to Croydon than either Beckton or Park Royal. • A modern facility that targets BREEAM (Building Research Establishment Environmental Assessment Method) Very Good. • To increase spare capacity at Beckton and Park Royal to enable third parties to use the facilities thereby generating income opportunities for the LFB.

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Question 6: Has an EIA been conducted previously? (please tick)	
Yes	<input checked="" type="checkbox"/> No
If yes, attach a copy. If no, state the reason.	Copy held by the Inclusion Team

Question 7: Who is it intended to benefit / Who does the change affect?	
Staff	<input checked="" type="checkbox"/> Wider public <input checked="" type="checkbox"/> Service users
Other (please state)	

Initial Equality Impact Assessment – Screening Stage

Complete the table below to see whether you need to complete a full Equality Impact Assessment.

Only positive impacts identified: No full EIA required	Only neutral impacts identified No full EIA required	One or more adverse impacts identified Full EIA required
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Question 8: Identifying the impacts	
Consider the relevance of the policy / project / decision on each group below and describe any impacts identified.	
NB: Some characteristics may attract multiple impacts e.g. age: positive impact on older people, adverse impact on younger people.	
Protected Characteristic	Level of Impact (Positive impact, neutral impact, adverse impact)
Age (younger, older or particular age group)	Neutral.
Disability (physical, sensory, mental health, learning disability, long term illness, hidden)	Neutral. Training would still be delivered at other training venues as is currently the position with accessibility for people with disabilities.
Gender reassignment (someone proposing to/undergoing/ undergone a transition from one gender to another)	Neutral. There are limited "privacy for all" (self-contained shower and changing space for delegates and trainers) at the two primary training facilities at Beckton and Park Royal.
Marriage / Civil Partnership (married as well as same-sex couples)	Neutral.

Pregnancy and Maternity	Neutral.
Race (including nationality, colour, national and/or ethnic origins)	Neutral.
Religion or Belief (people of any religion, or no religion, or people who follow a particular belief (not political))	Neutral. Prayer rooms exist at Beckton and Park Royal.
Sex (men and women)	Negative. Specific identified concerns raised by staff (women and men) about excessive travel particularly impacts women, who disproportionately are carers and have the majority of parenting and care responsibilities, will be impacted negatively.
Sexual Orientation (straight, bi, gay and lesbian people)	Neutral.
Are there any other groups this work may affect? i.e. carers, non-binary people, people with learning difficulties, neurodiverse people, people with dyslexia, ADHD, care leavers, ex-offenders, people living in areas of disadvantage, homeless people, people on low income / poverty?	No
Question 9: Has your assessment been able to demonstrate the following?	
Positive impact	None
Neutral impact	Age, Disability, Gender reassignment, Marriage/Civil Partnerships, Pregnancy and Maternity, Race, Religion or belief, Sexual Orientation
Adverse impact	Sex
Any other comments	

Question 10: Meeting the Public Sector Equality Duty under s149 Equality Act 2010	
How have you considered whether this project / policy / decision does the following:	
<ol style="list-style-type: none"> 1. Eliminates unlawful discrimination, harassment and victimisation 2. Advances equality of opportunity between different groups, and 3. Fosters good relations between different groups. 	
What we must do under law	Provide a description or summary of how this will be achieved
Eliminate discrimination	Not applicable

<p>Advance equality of opportunity</p>	<p>As outlined above, there is one potential negative impact associated with sex in that staff, although it has more of an impact for women because they normally have caring responsibilities. As part of the training commissioning and design process of the new Urban Firefighting course, a range of training delivery methods will be considered in order to mitigate the impact. Staff will continue to have to travel to training venues at Beckton and Park Royal in order to receive the training to maintain their competence and safely fulfil the requirements of their role.</p> <p>Discontinuing the project, can be justified due to the need for LFB to make financial savings and because the proposed training centre will not be able to fully deliver the course objectives of the proposed Urban Firefighting and Rescue training course that is being specified.</p>
<p>Foster good relations</p>	<p>Previously there has been positive communication about the project between LFB and the local residents and local ward councillors and good working relationships have been formed.</p> <p>The intention is to develop a communication strategy to inform internal stakeholders as well as the local residents and the ward councillors and politicians who have taken an interest in the project, of the decision, if the outcome and decision is made to discontinue the project. It is important to maintain the good relations that have been established.</p>

Question 12: Have you consulted with staff, LFB support groups, trade unions, public / service users, and / or others to help assess for impacts? (please tick)	
Yes	<input checked="" type="checkbox"/> No
If yes, who was involved and how were they involved? If not, why not?	
Who?	The Fire Brigades Union Fire Officers Association
How?	The Fire Brigades Union are provided with project updates on a monthly basis, at the Training Liaison meeting. The latest update was provided at the meeting held on 8 April 2021. The communication strategy will consider the approach to be taken to inform internal stakeholders as well as the local community, residents and the ward councillors, who had taken an interest in the project, of the decision, if that is the outcome and a decision made to discontinue the project.
If no consultation, why not?	

Question 13: How have you ensured your policy, project or proposal uses inclusive language that doesn't unintentionally discriminate against certain groups?	
Tools used to assess inclusive language e.g. gender bias screening tools , Stonewall toolkit on inclusive policies, speaking with Inclusion Team, Comms Style Guide , Policy 0370: Writing Policies and Procedures .	Outcome
When project-related documents are created and updated, the LFB Style Guide is referred to where necessary.	By keeping in mind the style guide, we are able to ensure that the words we use are inclusive.
Staff and public-facing communications are peer-reviewed (within the Project Team), and subject to input from the LFB Communications Department, and/or our external communications consultants (SP Broadway).	By obtaining input from communications professionals, both internal and external, we are able to refine and improve the language used to describe the project, so that it is inclusive.

Full Equality Impact Assessment Form

If you have identified **any** potential or actual adverse impacts, you must complete a full equality impact assessment form.

A full assessment helps you to decide what steps need to be taken to mitigate or justify the adverse impacts you have identified.



For guidance and support, please contact the Inclusion Team (Second Floor, Union Street, or email safertogether@london-fire.gov.uk) or a relevant Equality Support Group **(LINK TO ESG PAGE ON INCLUSION PAGES – HOTWIRE)**

Full EIA Form and Action Plan

Lead person responsible:	
Date the Action Plan will be reviewed:	

Protected Characteristic Group	What impact did you identify (positive, neutral, adverse)?	Do you plan to mitigate or justify this impact?	How will you mitigate or justify the impact? Outline the steps that will be taken	Who will be responsible?	When will this be reviewed?
Age					
Disability					
Gender reassignment					
Marriage / Civil Partnership					
Pregnancy and Maternity					
Race					
Religion or Belief					
Sex					
Sexual Orientation					
Other group e.g. carers, non-binary people, people with learning difficulties, neurodiverse people, people with dyslexia, ADHD, care leavers, ex-offenders, people living in areas of					



LONDON FIRE BRIGADE

disadvantage, homeless people, people on low income / poverty.					
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Document Control

Signed (lead for EIA / action plan)		Date	
Sign off by Inclusion Team		Date	
Stored by			
Links			

Dates for action plan to be reviewed	Comments