

Report title

## Award of Contract for Smoke Alarm Provision

Report to

Commissioner's Board  
London Fire Commissioner

Date

6 October 2021

Report by

Assistant Commissioner, Fire Safety

Report number

LFC-0604

Protective marking: **OFFICIAL - Sensitive**

Publication status: Published with redactions

If redacting, give reason: commercial sensitivity

I agree the recommended decision below.

**Andy Roe**

London Fire Commissioner

This Decision was signed  
remotely on 11 January 2022

Date

### Executive Summary

The London Fire Commissioner (LFC) provides home fire safety visits to people across London, during which smoke alarms are fitted in the homes visited, if required. The current contractual arrangement for purchasing smoke alarms comes to an end on 1 November 2021. This report outlines the steps taken to secure ongoing access to appropriate alarms.

### Recommended decisions

For the London Fire Commissioner

That the London Fire Commissioner:

1. approves expenditure of up to [REDACTED] over four years for the purchase of smoke alarms and associated products, utilising the West Midlands Fire and Rescue Service (FRS) smoke alarm procurement framework which was procured in accordance with the Public Contracts Regulations 2015.
2. delegates authority to the Assistant Director, Procurement and Commercial, to make call offs under the West Midlands Fire and Rescue Service (FRS) smoke alarm procurement framework for the provision of smoke alarms and associated products for up to 4 years.

## Introduction and Background

1. LFC typically carry out approximately 80,000 home fire safety visits (HFSVs) across London in a non-pandemic year. Whilst the pandemic has necessitated a risk based reduction of visits, it is anticipated that when all restrictions are lifted, the number of HFSVs carried out by staff will reach the level seen pre-pandemic. This is subject to any fluctuations in Government restrictions and National Fire Chiefs Council (NFCC) advice regarding Covid-19.

---

<sup>1</sup> To be redacted for published report

2. As part of the HFSV service, appropriate smoke alarms are fitted in the homes visited. The contract to procure these alarms is due to expire on 1 November 2021. The current agreement is with the West Midlands FRS smoke alarm procurement framework.
3. The delay in bringing forward this report arises from ongoing staffing challenges within the Procurement department. Those delays have impacted more widely (than just this project) across the Directorate; discussion at the Operational Delivery Directorate Board has resulted in officers taking away actions to address the Directorate's concerns.
4. West Midlands FRS have developed a new multi-supplier framework for the supply of smoke alarms and associated products, which commenced on 1 June 2021 and is available to all UK fire and rescue services. The alarms available for purchase via the framework meet LFC's specification, both for current needs and those anticipated for the next four years (the length of the agreement). They include standard, hard of hearing and linked smoke detection.
5. The recommendation is that LFC procure smoke alarms and related products via the new West Midlands FRS framework agreement.

## Alternative Options Considered and Consultation

### Re-tender the requirement in line with the Public Contract Regulations

6. The alternative to this approach is to publish an LFC-specific tender for smoke alarm provision via the Find a tender (FTS) portal, to reach all suitable suppliers within the market. This process will take approximately six to nine months to complete. Procurement department advise that research shows no significant benefit will be achieved by pursuing this route and that the framework provides access to lower prices through aggregating the requirements of the LFC with other FRSs, therefore producing economies of scale. The recommended framework has undergone a full open Official Journal of the European Union (OJEU) procedure therefore no further benefit is anticipated from repeating this process.
7. The benefits available through utilising the West Midlands FRS framework include reduced tendering timescales, therefore reducing staff and resource costs associated with this procurement. This approach also supports the collaboration agenda.

## Procurement Evaluation

There are three lots available under the Framework:

8. Lot 1: Standard Smoke Alarm  
The award criteria for Lot 1 will be a direct award based on lowest price meeting the LFC requirements. The specifications submitted for this lot will be assessed for suitability. There are three suppliers on this lot.

9. Lot 2: Direct award of Hearing-Impaired alarms and activating devices  
The award criteria for Lot 2 will be a direct award based on lowest price meeting the LFC requirements. The specifications submitted for this lot will be assessed for suitability. There are four suppliers on this lot.
10. Lot 3: Smart Home Devices which are devices connected to a monitoring system  
Further competition is the only evaluation model available for this lot. Evaluation criteria will be based on a 50/25/25 percentage split against Quality, Price and Delivery. This model will give the LFC the opportunity to understand how the tenderers will meet any LFC specific requirement
11. The recommended evaluation approach balances risk, quality and value for money and will produce an outcome that will enable the LFC to meet the HFSV obligations.

### **Objectives and Expected Outcomes**

12. The LFC provides home fire safety visits across London to reduce the likelihood and impact of accidental dwelling fires. Fire station personnel carry out the visits and provide fire safety advice tailored to the needs of the residents. During the visit, smoke alarms are fitted in all areas of risk to provide the earliest possible warning. Where necessary, hard of hearing alarms are provided.
13. Using the West Midlands FRS smoke alarm procurement framework will enable home fire safety visits to continue uninterrupted, providing appropriate smoke detection alongside valuable home fire safety information.

### **Equality Impact**

14. HFSVs are targeted at those most in need of fire safety guidance and the fitting of suitable smoke detection equipment. LFC's criteria for a high risk individual relate to an individual who:
  - a. carries out high risk fire behaviours
  - b. is less able to react to a fire/alarm
  - c. is less able to escape from a fire
15. The criteria – or fire risk factors – listed above include people with physical and mental or cognitive health difficulties, sensory impairments, and the potential for incapacity due to alcohol and / or drug use (including prescription medication). Therefore, the specification for smoke alarms includes alarms suitable for people with limited / no sight and hearing loss / lack of hearing. It also includes alarms which can be interlinked, to provide earlier notification of fire e.g. for people with poor mobility and those who need their smoke alarms linked to a telecare system.
16. 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.
17. 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.
18. 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.

19. The Public Sector Equality Duty requires us, in the exercise of all LFC functions (i.e. everything the LFC does), 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.
  
20. 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.
  
21. 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.
  
22. 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.
  
23. An Equality Impact Assessment (EIA) was undertaken on 6 August 2021 and is circulated with this report. The impact assessment found one potential negative impact and identified the mitigating actions, as follows:
  - a. Age: according to the NHS, Long-sightedness or hypermetropia "often affects adults over 40, but can affect people of all ages". To support affected staff, smoke alarm and other equipment fitting information should be provided in large print format. With regard to the recipients of HFSVs, who will receive smoke alarms, provision of large print versions of literature relating to maintenance and troubleshooting should be made. Previous smoke alarm and related product specifications have not included this provision, meaning that this specification will better support the Public Sector Equality Duty to eliminate discrimination, compared to previous specifications.
  
24. The EIA has been signed off by the Head of Culture.

### **Procurement and Sustainability**

25. The recommended procurement approach fulfils the London Fire Commissioner's duty to consider collaboration for the provision of Smoke Alarms and Associated Products. The framework for these products was set up by West Midlands FRS and is available for use by all other FRSs. The framework has undergone a fully compliant OJEU procurement process securing competitive prices, and a range of alarms that meet the LFC's requirements.

26. Any new procurement activity will need to be undertaken in line with the GLA group Responsible Procurement policy.
27. A number of Responsible Procurement requirements will be taken into account, including ethical sourcing standards and Equality, Diversity and Inclusion requirements.
28. The end disposal of the smoke alarms will be the responsibility of the homeowner in line with The Waste Electrical and Electronic Equipment (WEEE) Regulations (2013).

### **Strategic Drivers**

29. This piece of work falls under the 'delivering excellence' strategic pillar, in that it enables LFC to secure best value for money and efficiency in the supply of smoke alarms. It also enables LFC collaboration with other United Kingdom fire and rescue services, through participation in the West Midlands FRS procurement framework.

### **Workforce Impact**

30. The recommendations set out in this report will have no negative impact upon the wider workforce – it will enable them to carry out the existing home fire safety visit process in the normal way. If a decision is made to change alarm type, that may mean that watches would need familiarisation in new technical details, which would have an impact upon time available at stations. This impact will be factored into the contract award decision-making process and if appropriate, consultation will take place with Fire Stations department management.

### **Finance comments**

31. This report recommends that revenue expenditure of [REDACTED] is agreed over a four year period for the purchase of smoke alarms. This will be funded from the annual budget for smoke alarms of [REDACTED].

### **Legal comments**

32. 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. 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.
  33. By direction dated 1 April 2018, the Mayor set out those matters, for which the Commissioner would require the prior approval of either the Mayor or the Deputy Mayor for Fire and Resilience (the "Deputy Mayor").
  34. Paragraph (b) of Part 2 of the said direction requires the Commissioner to seek the prior approval of the Deputy Mayor before "[a] commitment to expenditure (capital or revenue) of £150,000 or above as identified in accordance with normal accounting practices...". The decision to purchase smoke alarms and associated products at a cost of up to [REDACTED] over four years will therefore require approval from the Deputy Mayor.
  35. The proposed recommendation is also for the London Fire Commissioner to delegate authority to the Assistant Director of Technical and Commercial to make call offs under West Midlands FRS framework for the supply of smoke alarms and associated products, which commenced on 1 June 2021, which is permitted under Part 4 of the LFC Scheme of Governance.
-

<sup>2</sup> To be redacted before publication

<sup>3</sup> To be redacted before publication <sup>4</sup> To be redacted before publication

36. The statutory basis for the actions proposed in this report is provided by sections 7 and 5A of the Fire and Rescue Services Act 2004 ("FRSA 2004"). Section 7 (2)(a) FRSA 2004 the Commissioner has the power to secure the provision of personnel, services and equipment necessary to efficiently meet all normal requirements for firefighting and section 5A allows the Commissioner to procure personnel, services and equipment they consider appropriate for purposes incidental or indirectly incidental to their functional purposes.

37. The report confirms the provision of smoke alarms and associated products will be secured via the West Midlands FRS framework for the supply of smoke alarms and associated products, which was tendered compliantly in accordance with the Public Contract Regulations 2015.

### List of Appendices

<b>Appendix</b>	<b>Title</b>	<b>Protective Marking</b>
1.	Equalities Impact Assessment	None

## 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.

<b>1. What is the name of the policy, project, decision or activity?</b>
Smoke alarm procurement specification development

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

<b>High</b>		<b>Medium</b>	✓	<b>Low</b>	
-------------	--	---------------	---	------------	--

<b>2. Contact details</b>	
Name of EIA author	Marvin Ikua
Department and Team	Community Safety Policy and Projects
Date of EIA	06/08/2021

<b>3. Aim and Purpose</b>	
What is the aim and purpose of the policy, project, decision or activity?	The purpose of the activity is to develop a procurement specification for smoke alarms and related products, which are provided as part of Home Fire Safety visit (HFSV) delivery.
Who is affected by this work (all staff, specific department, wider communities?)	<ul style="list-style-type: none"> <li>The staff who are involved in the fitment of smoke alarms as part of HFSVs. This includes operational staff and FRS staff.</li> <li>The specification will need to consider the specific needs of the diverse population of London, who are the target audience for HFSVs. Normal annual HFSV service delivery (prior to the COVID-19 pandemic) is approximately 80,000 HFSVs annually. This is a reach of approximately 0.9% of London's 8.9 million population annually.</li> </ul>

<b>4. Equality considerations:</b> the EIA must be based on evidence and information.
---



LONDON FIRE BRIGADE

What consultation has taken place to support you to predict the equality impacts of this work?

Consultation took place in various forms including sharing the specification with a fire safety expert and sharing a draft of this EIA with equality support groups for comment.



## 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?
<i>Example: Age</i>	<i>Adverse</i>	<i>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.</i>	<i>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</i>

			<i>regular access to a computer or smart phone.</i>
<b>Age</b> (younger, older or particular age group)	<b>Positive</b>	<p><b>Smoke Alarm fitment considerations for Staff</b></p> <p>Smoke alarms and related products are technical products, fitted by a diverse range of staff, within the operational and FRS staff groups. Properly fitting these technical products requires technical knowledge and skills, some of which is provided in the form of training, however manuals are also available to assist staff with the practical elements of fitment, as well as troubleshooting. According to the NHS, Long-sightedness or hypermetropia "often affects adults over 40, but can affect people of all ages"<sup>1</sup>. To mitigate the possibility of staff with severe long-sightedness being adversely impacted, large print versions of all literature pertaining to smoke alarm and related product fitment, as well as troubleshooting should be developed and made available by the supplier.</p> <p><b>Usage considerations for HFSV Recipients</b></p> <p>Apart from considerations to the impact on staff, due regard has been given to the impacts of this activity to the recipients of HFSVs, who will receive smoke alarms. This includes the provision of large print versions of literature relating to maintenance and troubleshooting. Previous smoke alarm and related product specifications have not included this provision, meaning that this specification will better support the Public Sector Equality Duty to eliminate discrimination, compared to previous specifications.</p> <p>The same age-related accessibility provisions for staff, will be made available for recipients of HFSVs, because they will need to maintain their smoke alarms and related products over the expected life of the products (up to 10 years). Not having the manual available on an accessible form may result in the adverse impact of a resident failing to spot issues with their alarm product, which could impede its ability to warn the resident of a fire, should one occur.</p>	<i>See citations at the bottom of each page.</i>

<sup>1</sup> NHS (Accessed June 2021), Long-sightedness, Overview, <https://www.nhs.uk/conditions/long-sightedness/>

The current (as at June 2021) HFSV booking page<sup>2</sup> does list age, specifically being over the age of 70 as one of the questions asked to people requesting a HFSV, to assess fire risk. This is because the data shows that older people are at an increased risk of experiencing and being injured during a fire. This is due to their reduced ability to notice a fire, raise the alarm or escape quickly. Older people also have an increased chance of having one or more characteristics associated with an increased risk of experiencing an accidental fire in the home, such as dementia or significantly impaired mobility.

The below table<sup>3</sup> demonstrates that people in older age groups are overrepresented in fatal fires, compared to people in younger age groups. The chart below has been formatted to show higher numbers of deaths in red, lower numbers in amber/yellow and the lowest in green to illustrate the aforementioned association with age and increased risk of experiencing a fire.

**Table 3: Fire deaths, by age, since 2010**

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Average distribution
	59	55	42	49	29	32	46	102	45	37	
00 to 01	-	-	-	-	-	-	-	2	-	-	0%
01 to 04	1	1	-	1	-	-	-	5	-	-	2%
05 to 09	-	2	-	-	-	-	-	4	1	-	1%
10 to 14	-	2	-	-	-	-	-	6	-	1	2%
15 to 19	-	-	-	1	-	-	-	2	-	1	1%
20 to 24	-	3	1	2	-	-	2	4	-	-	2%
25 to 29	1	3	-	2	1	1	1	8	-	-	3%
30 to 34	4	2	4	5	1	1	2	8	-	1	6%
35 to 39	2	3	1	2	3	1	1	4	4	2	5%
40 to 44	5	4	2	2	-	3	1	4	4	5	6%
45 to 49	1	3	4	1	1	1	2	3	4	4	5%
50 to 54	5	3	4	5	1	5	5	5	2	5	8%

<sup>2</sup>London Fire Brigade (Accessed June 2021), Assessing the risk, <https://www.london-fire.gov.uk/safety/the-home/home-fire-safety-visits/covid-19-and-home-fire-safety-visits-hfsvs/>

<sup>3</sup> London Fire Brigade (2019) Fire Facts, Page 37, Table 3.2, <https://data.london.gov.uk/dataset/fire-facts-fire-deaths-in-greater-london/>

		55 to 59	4	5	2	4	4	-	2	5	4	3	7%																																										
		60 to 64	8	3	2	2	3	1	4	11	2	3	8%																																										
		65 to 69	7	1	4	2	3	5	3	8	2	2	7%																																										
		70 to 74	5	2	3	5	2	3	8	8	4	1	8%																																										
		75 to 79	2	4	3	7	-	3	5	8	5	2	8%																																										
		80 to 84	7	5	6	3	3	3	3	4	9	1	9%																																										
		85 to 89	3	6	1	1	4	3	4	3	3	2	6%																																										
		90 plus	4	3	5	4	3	2	3	-	1	1	5%																																										
		Unknown	-	-	-	-	-	-	-	-	-	3	1%																																										
<b>Disability</b> (physical, sensory, mental health, learning disability, long term illness, hidden)	<b>Positive</b>	<p>The specification should take into account the specific disability-related needs of residents and aim to provide them with interventions, alongside standard smoke/heat/CO alarms that mitigate their specific risks.</p> <p>The below table<sup>4</sup> shows the prevalence of disability, in London, by age group and disability type. This table was generated by the GLA Transport Committee in 2010. This dataset this table is drawn from is the most comprehensive report of differentiated disability types for London available. It is the basis for the "Accessibility of the transport network 2010" report which makes predictions about disability prevalence in London until 2031.</p> <p><b>Table 4: Prevalence of disability, in London, by age group and disability type (2010)</b></p> <table border="1"> <thead> <tr> <th></th> <th>05-16</th> <th>17-24</th> <th>25-44</th> <th>45-59</th> <th>60+</th> </tr> </thead> <tbody> <tr> <td><b>01 None</b></td> <td>1,060,150</td> <td>712,930</td> <td>2,595,597</td> <td>1,126,821</td> <td>869,323</td> </tr> <tr> <td><b>02 Wheelchair user</b></td> <td>3,816</td> <td>706</td> <td>8,272</td> <td>9,954</td> <td>62,647</td> </tr> <tr> <td><b>03 Mobility</b></td> <td>2,873</td> <td>2,189</td> <td>34,212</td> <td>61,407</td> <td>216,496</td> </tr> <tr> <td><b>04 Visual</b></td> <td>652</td> <td>0</td> <td>4,227</td> <td>4,855</td> <td>17,892</td> </tr> <tr> <td><b>05 Hearing</b></td> <td>2,445</td> <td>0</td> <td>5,296</td> <td>5,537</td> <td>13,140</td> </tr> <tr> <td><b>06 Learning</b></td> <td>8,491</td> <td>4,057</td> <td>7,183</td> <td>2,286</td> <td>1,142</td> </tr> </tbody> </table>													05-16	17-24	25-44	45-59	60+	<b>01 None</b>	1,060,150	712,930	2,595,597	1,126,821	869,323	<b>02 Wheelchair user</b>	3,816	706	8,272	9,954	62,647	<b>03 Mobility</b>	2,873	2,189	34,212	61,407	216,496	<b>04 Visual</b>	652	0	4,227	4,855	17,892	<b>05 Hearing</b>	2,445	0	5,296	5,537	13,140	<b>06 Learning</b>	8,491	4,057	7,183	2,286	1,142
			05-16	17-24	25-44	45-59	60+																																																
<b>01 None</b>	1,060,150	712,930	2,595,597	1,126,821	869,323																																																		
<b>02 Wheelchair user</b>	3,816	706	8,272	9,954	62,647																																																		
<b>03 Mobility</b>	2,873	2,189	34,212	61,407	216,496																																																		
<b>04 Visual</b>	652	0	4,227	4,855	17,892																																																		
<b>05 Hearing</b>	2,445	0	5,296	5,537	13,140																																																		
<b>06 Learning</b>	8,491	4,057	7,183	2,286	1,142																																																		

<sup>4</sup> GLA (2010), <https://data.london.gov.uk/dataset/londoners-reduced-mobility>

		<p>The Brigade currently provides several thousand specialist hard of hearing smoke alarms, to ensure that people with hearing impairments receive the same minimum level of fire detection as people without hearing impairments. The specification will specifically request that two modes of alerting people with hearing impairments of a smoke/heat/CO actuation: tactile and visual. Vibrating pads, which can be placed under pillows and cushions provide tactile alerts. Additionally, strobe lights provide visual alerts. The specification will require both alert modes, to maximise the likelihood of early warning, which will provide the resident with an increased chance of being notified of the fire at its early stages of development. This would mean that the resident could escape in good time, or summon a fire response at an earlier stage of fire development. Both of these early actions would improve the resident's survival outcomes, theoretically enabling a comparable reaction time to alarms, as people without hearing impairments.</p> <p>The Brigade also has a provision for visually impaired people – bright orange stickers which are affixed onto the test button of smoke alarms. These stickers enable visually impaired recipients of HFSVs to easily locate and test their alarms, meaning that they can maintain their alarms in the same way non-visually impaired people are advised to during the HFSV.</p> <p>To further improve outcomes for people with sensory impairments, supplemental engagement with key stakeholders will be carried out. The purpose of this engagement is to see how the provision of the specialise hearing impaired and visually impaired interventions provided by the Brigade can be improved. The specification stipulates that the supplier must work with the Brigade to improve existing products, so the feedback of the stakeholder will be able effect meaningful change.</p>	
<p><b>Gender reassignment</b> (someone proposing to/undergoing / undergone a transition from one gender to another)</p>	<p><b>Positive</b></p>	<p>Although the Office of National Statistics do not produce estimates of the number of transgender people living in the UK<sup>5</sup>, the LGBT transgender rights charity Stonewall estimates that approximately 1% of the British population might identify as trans (including non-binary). This could mean that there are approximately 89,000 trans (including non-binary) people living in London.</p> <p>The Stonewall's Trans Report found that two in five trans people (41 percent) and three in ten non-binary people (31 percent) have experienced a hate crime or incident because of their identity in the last 12 months.<sup>6</sup> Another LGBT charity, Galop provided hate crime evidence to the London assembly, which revealed that recorded homophobic and transphobic (the data is not currently separated) has risen significantly in recent years. Galop reported that in 2017/18 1,651 transphobic hate crimes were recorded (up 32% from the previous year).</p>	

<sup>5</sup> ONS (Accessed June 2021), <https://www.ons.gov.uk/aboutus/transparencyandgovernance/freedomofinformationfoi/transgenderpopulationfigures>

<sup>6</sup> Stonewall (2017), Trans Report, page 7, Key findings, [https://www.stonewall.org.uk/system/files/lgbt\\_in\\_britain\\_-\\_trans\\_report\\_final.pdf](https://www.stonewall.org.uk/system/files/lgbt_in_britain_-_trans_report_final.pdf)

		<p>Although there is no publically available data that shows a clear link between transphobic offences and fire risk, there are individual media reports showing that fire has historically been used as a weapon in homophobic attacks, in private dwellings<sup>7</sup>. It would be reasonable to conclude that trans people might be at an increased risk of hate crime related arson attacks, compared to non-trans people. Smoke alarms are fitted in all areas of risk, where there are none already present during HFSVs. The presence of smoke alarms in a property means that should a fire-related hate crime occur the resident would have an increased chance of being notified of the fire at its early stages of development. This would mean that the resident could escape in good time, or call 999 at an earlier stage of fire development. Both of these early actions would improve the resident's survival outcomes.</p>	
<p><b>Marriage / Civil Partnership</b> (married as well as same-sex couples)</p>	<p><b>Neutral</b></p>	<p>For the year ending March 2020, the Crime Survey for England and Wales showed that adults aged 16 to 74 years who were separated or divorced were more likely to have experienced domestic abuse than those who were married or civil partnered, cohabiting, single or widowed.</p> <p>Although there is no publically available could be found that shows a clear link between marital status offences and fire risk in the UK, It would be reasonable to conclude that based on the Crime Survey for England and Wales data, that people belonging to certain marital status groups might be at an increased risk of arson attacks, compared to other groups. Specifically, the evidence shows that separated and divorces individuals had the highest rates of domestic abuse.</p> <p>Smoke alarms are fitted in all areas of risk, where there are none already present during HFSVs. The presence of smoke alarms in a property means that should a fire-related hate crime occur the resident would have an increased chance of being notified of the fire at its early stages of development. This would mean that the resident could escape in good time, or call 999 at an earlier stage of fire development. Both of these early actions would improve the resident's survival outcomes.</p> <p>The below graph shows this association between marital status and experience of domestic abuse.</p>	

<sup>7</sup> Pink News (2020), Nick Duffy, <https://www.pinknews.co.uk/2020/02/18/man-jailed-arson-fire-transgender-hate-crime-attack/>

		<p style="text-align: center;"><b>Prevalence of domestic abuse in the last year for adults aged 16 to 74 years, by marital status and sex, England and Wales, year ending March 2020</b></p> <table border="1"> <caption>Data from chart: Prevalence of domestic abuse (%)</caption> <thead> <tr> <th>Marital Status</th> <th>Men (%)</th> <th>Women (%)</th> </tr> </thead> <tbody> <tr> <td>Married/civil partnered</td> <td>~2.5</td> <td>~4.0</td> </tr> <tr> <td>Widowed</td> <td>~2.5</td> <td>~3.5</td> </tr> <tr> <td>Cohabiting</td> <td>~4.0</td> <td>~7.5</td> </tr> <tr> <td>Single</td> <td>~5.5</td> <td>~12.0</td> </tr> <tr> <td>Divorced</td> <td>~8.0</td> <td>~13.0</td> </tr> <tr> <td>Separated</td> <td>~12.5</td> <td>~18.5</td> </tr> </tbody> </table> <p style="text-align: right;">8</p>	Marital Status	Men (%)	Women (%)	Married/civil partnered	~2.5	~4.0	Widowed	~2.5	~3.5	Cohabiting	~4.0	~7.5	Single	~5.5	~12.0	Divorced	~8.0	~13.0	Separated	~12.5	~18.5	
Marital Status	Men (%)	Women (%)																						
Married/civil partnered	~2.5	~4.0																						
Widowed	~2.5	~3.5																						
Cohabiting	~4.0	~7.5																						
Single	~5.5	~12.0																						
Divorced	~8.0	~13.0																						
Separated	~12.5	~18.5																						
<p><b>Pregnancy and Maternity</b></p>	<p><b>Neutral</b></p>	<p>There is no published data that demonstrates a clear link between fire risk, pregnancy and maternity status. Nor is it always the case that said people will exhibit physical or mental issues.</p> <p>According to the Office of National Statistics, in 2018 there were 75.4 conceptions per 1,000 women aged 15 to 44 years, in England and Wales<sup>9</sup>. This means that of the 80,000 HFSVs conducted in 2018, approximately 6,000 (7.5%) were potentially delivered to households with women who have conceived in that year (although some may have had abortions following conception).</p> <p>There doesn't seem to be a strong association between pregnancy and maternity with fire risk. If a strong association was found, it would have been picked up the Brigade's fire trends analysis report - Fire Facts - <a href="#">Fires in Greater London 2019</a>.</p>																						

<sup>8</sup> ONS (Accessed July 2021), Figure 7: Separated or divorced people were more likely to experience domestic abuse, <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/domesticabusevictimcharacteristicsenglandandwales/yearendingmarch2020>

<sup>9</sup> ONS (Accessed July 2021), 2. Number of conceptions and conception rates, <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/conceptionandfertilityrates/bulletins/conceptionstatistics/2018>

<b>Race</b> (including nationality, colour, national and/or ethnic origins)	<b>Neutral</b>	In terms of fire risk, white people (who make up 86% of the population <sup>10</sup> ) are consistently disproportionately at a higher risk of dying in a fire. The reason for this is uncertain. It is not clear how to mitigate possible disadvantages for this group. However, Smoke alarms are fitted in all areas of risk, where there are none already present during HFSVs. The presence of smoke alarms in a property means that should a dwelling fire occur, the resident would have an increased chance of being notified of the fire at its early stages of development.										
		<b>Table 8: Ethnicity of victim (Fire related deaths), from 2010</b>										
			2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
			59	55	42	49	29	32	46	102	45	37
		Arab*	-	-	-	-	-	1	-	2	-	-
		Bangladeshi	-	-	-	-	-	-	-	-	-	-
		Black African	4	1	-	1	1	-	-	1	5	1
		Black Caribbean	1	2	4	4	2	6	4	-	4	3
		Black Other	1	1	1	-	2	1	1	1	1	2
		Chinese	-	-	-	-	-	-	-	1	-	-
		Indian	2	5	-	1	2	2	3	-	3	2
		Latin American*	-	-	-	-	-	-	-	-	-	-
		Other	-	-	-	-	-	1	1	-	-	-
		Other Asian	4	14	2	6	2	3	6	4	1	5
		Pakistani	-	1	-	1	-	-	-	-	-	1
White	43	28	34	33	19	18	30	22	28	12		
White - Gypsy or Irish Traveller	-	-	-	-	-	-	-	-	-	-		
Not recorded	4	3	1	3	1	-	1	71	3	11		

<sup>10</sup> ONS (2011), 2011 Census Analysis, Introduction, <https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/ethnicity/articles/2011censusanalysisethnicityandreligionofthenonukbornpopulationinenglandandwales/2015-06-18>



<b>Religion or Belief</b> (people of any religion, or no religion, or people who follow a particular belief (not political))	<b>Neutral</b>	<b>Known Fire Risk Associated with Particular Religions or Beliefs</b>																																																																																																									
		<p>It is recognised that in many religions or as part of the expression of personal beliefs, flammable paraphernalia such as incense sticks (such as Hindu Agarbatti) or candles (such as the Hanukkah menorah)<sup>11</sup> are used. Advice is currently given by Brigade staff covering the fire risk associated with candles and incense. Additionally smoke alarms are fitted in all areas of risk, where there are none already present during HFSVs. The presence of smoke alarms in a property mean that should a dwelling fire occur the resident would have an increased chance of being notified of the fire at its early stages of development.</p> <p>Although illegal in the UK, believers of some religious and belief systems (such as Rastafarianism) engage in personal use of cannabis. Cannabis use involves the use of matches and lighters, which can, along with the rolled cannabis, be an ignition source.</p> <p><b>Table 9: Population by Religion, London Borough<sup>12</sup></b></p> <table border="1"> <thead> <tr> <th>Area</th> <th>Christian</th> <th>Buddhist</th> <th>Hindu</th> <th>Jewish</th> <th>Muslim</th> <th>Sikh</th> <th>Other religion</th> <th>No religion</th> <th>Religion not stated</th> </tr> </thead> <tbody> <tr> <td>Barking and Dagenham</td> <td>104,101</td> <td>842</td> <td>4,464</td> <td>425</td> <td>25,520</td> <td>2,952</td> <td>533</td> <td>35,106</td> <td>11,968</td> </tr> <tr> <td>Barnet</td> <td>146,866</td> <td>4,521</td> <td>21,924</td> <td>54,084</td> <td>36,744</td> <td>1,269</td> <td>3,764</td> <td>57,297</td> <td>29,917</td> </tr> <tr> <td>Bexley</td> <td>144,093</td> <td>1,377</td> <td>3,547</td> <td>234</td> <td>5,645</td> <td>4,156</td> <td>724</td> <td>55,995</td> <td>16,226</td> </tr> <tr> <td>Brent</td> <td>129,080</td> <td>4,300</td> <td>55,449</td> <td>4,357</td> <td>58,036</td> <td>1,709</td> <td>3,768</td> <td>33,054</td> <td>21,462</td> </tr> <tr> <td>Bromley</td> <td>187,656</td> <td>1,580</td> <td>4,987</td> <td>957</td> <td>7,841</td> <td>736</td> <td>1,138</td> <td>80,303</td> <td>24,194</td> </tr> <tr> <td>Camden</td> <td>84,737</td> <td>3,154</td> <td>3,591</td> <td>11,226</td> <td>30,384</td> <td>518</td> <td>1,423</td> <td>64,064</td> <td>21,237</td> </tr> <tr> <td>City of London</td> <td>3,344</td> <td>92</td> <td>145</td> <td>166</td> <td>409</td> <td>18</td> <td>28</td> <td>2,522</td> <td>651</td> </tr> <tr> <td>Croydon</td> <td>205,022</td> <td>2,381</td> <td>21,739</td> <td>709</td> <td>29,513</td> <td>1,450</td> <td>2,153</td> <td>72,654</td> <td>27,757</td> </tr> <tr> <td>Ealing</td> <td>148,055</td> <td>4,228</td> <td>28,915</td> <td>1,131</td> <td>53,198</td> <td>26,778</td> <td>1,987</td> <td>50,848</td> <td>23,309</td> </tr> </tbody> </table>								Area	Christian	Buddhist	Hindu	Jewish	Muslim	Sikh	Other religion	No religion	Religion not stated	Barking and Dagenham	104,101	842	4,464	425	25,520	2,952	533	35,106	11,968	Barnet	146,866	4,521	21,924	54,084	36,744	1,269	3,764	57,297	29,917	Bexley	144,093	1,377	3,547	234	5,645	4,156	724	55,995	16,226	Brent	129,080	4,300	55,449	4,357	58,036	1,709	3,768	33,054	21,462	Bromley	187,656	1,580	4,987	957	7,841	736	1,138	80,303	24,194	Camden	84,737	3,154	3,591	11,226	30,384	518	1,423	64,064	21,237	City of London	3,344	92	145	166	409	18	28	2,522	651	Croydon	205,022	2,381	21,739	709	29,513	1,450	2,153	72,654	27,757	Ealing	148,055	4,228	28,915	1,131	53,198	26,778	1,987
Area	Christian	Buddhist	Hindu	Jewish	Muslim	Sikh	Other religion	No religion	Religion not stated																																																																																																		
Barking and Dagenham	104,101	842	4,464	425	25,520	2,952	533	35,106	11,968																																																																																																		
Barnet	146,866	4,521	21,924	54,084	36,744	1,269	3,764	57,297	29,917																																																																																																		
Bexley	144,093	1,377	3,547	234	5,645	4,156	724	55,995	16,226																																																																																																		
Brent	129,080	4,300	55,449	4,357	58,036	1,709	3,768	33,054	21,462																																																																																																		
Bromley	187,656	1,580	4,987	957	7,841	736	1,138	80,303	24,194																																																																																																		
Camden	84,737	3,154	3,591	11,226	30,384	518	1,423	64,064	21,237																																																																																																		
City of London	3,344	92	145	166	409	18	28	2,522	651																																																																																																		
Croydon	205,022	2,381	21,739	709	29,513	1,450	2,153	72,654	27,757																																																																																																		
Ealing	148,055	4,228	28,915	1,131	53,198	26,778	1,987	50,848	23,309																																																																																																		

<sup>11</sup> NFCC (2008), Religion, Belief and Culture in our Community, Page 33,

[https://www.nationalfirechiefs.org.uk/write/MediaUploads/NFCC%20Guidance%20publications/Workforce/Equality/Faithguide\\_National\\_FINAL.pdf](https://www.nationalfirechiefs.org.uk/write/MediaUploads/NFCC%20Guidance%20publications/Workforce/Equality/Faithguide_National_FINAL.pdf)

<sup>12</sup> ONS (2011), 2011 Census, Population by Religion, Borough, <https://data.london.gov.uk/dataset/percentage-population-religion-borough>



LONDON FIRE BRIGADE

Enfield	167,417	1,824	10,927	4,412	52,141	1,078	1,950	48,522	24,195
Greenwich	134,632	4,223	9,087	492	17,349	3,490	1,013	65,034	19,237
Hackney	95,131	3,075	1,577	15,477	34,727	1,872	1,311	69,454	23,646
Hammersmith and Fulham	98,808	2,060	2,097	1,161	18,242	442	857	43,487	15,339
Haringey	114,659	2,829	4,539	7,643	36,130	808	1,303	64,202	22,813
Harrow	89,181	2,700	60,407	10,538	29,881	2,752	5,945	22,871	14,781
Havering	155,597	760	2,963	1,159	4,829	1,928	648	53,549	15,799
Hillingdon	134,813	2,386	22,033	1,753	29,065	18,230	1,669	46,492	17,495
Hounslow	106,660	3,617	26,261	651	35,666	22,749	1,540	40,351	16,462
Islington	90,107	2,298.8	2,306	2,089	21,470	625	1,052	67,973	18,201
Kensington and Chelsea	86,005	2,447	1,386	3,320	15,812	263	778	32,669	15,969
Kingston upon Thames	84,684	1,771	7,502	775	9,474	1,236	802	41,183	12,633
Lambeth	160,944	2,963	3,119	1,134	21,500	440	1,682	84,803	26,501
Lewisham	145,588	3,664	6,562	643	17,759	531	1,478	75,155	24,505
Merton	111,993	1,884	12,203	791	16,262	498	810	41,231	14,021
Newham	123,119	2,446	26,962	342	98,456	6,421	1,090	29,373	19,775
Redbridge	102,755	1,840	31,699	10,213	64,999	17,377	1,348	30,691	18,048
Richmond upon Thames	103,319	1,577	3,051	1,409	6,128	1,581	890	53,195	15,840
Southwark	151,462	3,884	3,668	1,006	24,551	653	1,350	77,098	24,611
Sutton	111,086	1,368	8,038	486	7,726	325	796	46,817	13,504
Tower Hamlets	75,087	2,994	4,717	1,396	96,156	911	908	54,363	17,560
Waltham Forest	124,939	1,987	5,917	1,259	56,541	1,209	993	46,462	18,942
Wandsworth	162,590	2,574	6,496	1,617	24,746	832	1,283	82,740	24,117
Westminster	97,877	3,194	4,178	7,237	40,073	496	1,280	44,542	20,519

		Like all other protected characteristics, the provision of smoke alarms in a property means that should a dwelling fire occur, the resident, regardless of sex would have an increased chance of being notified of the fire at its early stages of development. This would mean that the resident could escape in good time, or call 999 at an earlier stage of fire development. Both of these early actions would improve the resident's survival outcomes.																																																																	
<b>Sex</b> (men and women)		<p>The data in table 10<sup>13</sup> below shows that males (who make up 49%<sup>14</sup> of the population) are consistently disproportionately at a higher risk of dying in a fire. The reason for this is uncertain at present.</p> <p>Like all other protected characteristics, the provision of smoke alarms in a property means that should a dwelling fire occur, the resident, regardless of sex would have an increased chance of being notified of the fire at its early stages of development. This would mean that the resident could escape in good time, or call 999 at an earlier stage of fire development. Both of these early actions would improve the resident's survival outcomes.</p> <p><b>Table 10: Gender of victim (Fire related deaths), from 2005<sup>15</sup></b></p> <table border="1"> <thead> <tr> <th></th> <th>2005</th> <th>2006</th> <th>2007</th> <th>2008</th> <th>2009</th> <th>2010</th> <th>2011</th> <th>2012</th> <th>2013</th> <th>2014</th> <th>2015</th> <th>2016</th> <th>2017</th> <th>2018</th> <th>2019</th> </tr> </thead> <tbody> <tr> <td>Female</td> <td>30</td> <td>24</td> <td>19</td> <td>12</td> <td>27</td> <td>26</td> <td>19</td> <td>22</td> <td>23</td> <td>9</td> <td>5</td> <td>14</td> <td>51</td> <td>22</td> <td>17</td> </tr> <tr> <td>Male</td> <td>30</td> <td>32</td> <td>32</td> <td>29</td> <td>28</td> <td>33</td> <td>36</td> <td>20</td> <td>26</td> <td>20</td> <td>27</td> <td>32</td> <td>51</td> <td>23</td> <td>20</td> </tr> <tr> <td>Male representation in fire related deaths</td> <td>50.0 %</td> <td>57.1 %</td> <td>62.7 %</td> <td>70.7 %</td> <td>50.9 %</td> <td>55.9 %</td> <td>65.5 %</td> <td>47.6 %</td> <td>53.1 %</td> <td>69.0 %</td> <td>84.4 %</td> <td>69.6 %</td> <td>50.0 %</td> <td>51.1 %</td> <td>54.1 %</td> </tr> </tbody> </table>		2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Female	30	24	19	12	27	26	19	22	23	9	5	14	51	22	17	Male	30	32	32	29	28	33	36	20	26	20	27	32	51	23	20	Male representation in fire related deaths	50.0 %	57.1 %	62.7 %	70.7 %	50.9 %	55.9 %	65.5 %	47.6 %	53.1 %	69.0 %	84.4 %	69.6 %	50.0 %	51.1 %	54.1 %	
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019																																																				
Female	30	24	19	12	27	26	19	22	23	9	5	14	51	22	17																																																				
Male	30	32	32	29	28	33	36	20	26	20	27	32	51	23	20																																																				
Male representation in fire related deaths	50.0 %	57.1 %	62.7 %	70.7 %	50.9 %	55.9 %	65.5 %	47.6 %	53.1 %	69.0 %	84.4 %	69.6 %	50.0 %	51.1 %	54.1 %																																																				
<b>Sexual Orientation</b> (straight, bi, gay and	<b>Positive</b>	A recent Met Police freedom of information request revealed that there has been a significant increase in the number of total homophobic offences between 2017/2018 to 2019/20 <sup>16</sup> . These incidents were not broken down into types (for example arson, physical assault etc).																																																																	

<sup>13</sup> London Fire Brigade (2019) Fire Facts, Page 39, Table 3.4, <https://data.london.gov.uk/dataset/fire-facts--fire-deaths-in-greater-london/>

<sup>14</sup> ONS (2011), Male and female populations, Main facts and figures, <https://www.ethnicity-facts-figures.service.gov.uk/uk-population-by-ethnicity/demographics/male-and-female-populations/latest>

<sup>16</sup> Met Police (2020), FOI Reference Number: Reference No: 01.FOI.20.014700, Table 1, [https://www.met.police.uk/SysSiteAssets/foi-media/metropolitan-police/disclosure\\_2020/july\\_2020/information-rights-unit--hate-crime-against-people-who-identify-as-transgender-or-based-on-sexual-orientation-from-april-2017-to-march-2020](https://www.met.police.uk/SysSiteAssets/foi-media/metropolitan-police/disclosure_2020/july_2020/information-rights-unit--hate-crime-against-people-who-identify-as-transgender-or-based-on-sexual-orientation-from-april-2017-to-march-2020)

lesbian people)	<b>Table 12: Homophobic Offences with Outcome Description and recorded date set between 01/04/2017 and 31/03/2020</b>																																					
	<table border="1"> <thead> <tr> <th>Outcome</th> <th>FY 2017/2018</th> <th>FY 2018/2019</th> <th>FY 2019/2020</th> <th>MPS Total</th> </tr> </thead> <tbody> <tr> <td>Caution - adult</td> <td>23</td> <td>12</td> <td>17</td> <td>52</td> </tr> <tr> <td>Caution - youth</td> <td>1</td> <td>0</td> <td>2</td> <td>3</td> </tr> <tr> <td>Charged/Summoned</td> <td>242</td> <td>182</td> <td>180</td> <td>604</td> </tr> <tr> <td>Outcome Pending</td> <td>1</td> <td>2</td> <td>80</td> <td>83</td> </tr> <tr> <td>Other Outcomes</td> <td>1,813</td> <td>2,175</td> <td>2,739</td> <td>6,727</td> </tr> <tr> <td><b>MPS Total</b></td> <td><b>2,080</b></td> <td><b>2,371</b></td> <td><b>3,018</b></td> <td><b>7,469</b></td> </tr> </tbody> </table>	Outcome	FY 2017/2018	FY 2018/2019	FY 2019/2020	MPS Total	Caution - adult	23	12	17	52	Caution - youth	1	0	2	3	Charged/Summoned	242	182	180	604	Outcome Pending	1	2	80	83	Other Outcomes	1,813	2,175	2,739	6,727	<b>MPS Total</b>	<b>2,080</b>	<b>2,371</b>	<b>3,018</b>	<b>7,469</b>	<p>Although there is no publically available data that shows a clear link between homophobic offences and fire risk, there are individual media reports showing that fire has historically been used as a weapon in homophobic attacks, in private dwellings<sup>17</sup>. It would be reasonable to conclude that bi, gay and lesbian people might be at an increased risk of hate crime related arson attacks, compared to heterosexual people. The Brigade does provide guidance and fire arson reduction letterboxes for people at a high risk of experiencing arson attacks, where appropriate, as part of HFSVs. This is in addition to smoke alarms, fitted in all areas of risk, during a HFSV where needed, which could provide early warning during a domestic arson attack.</p>	
Outcome	FY 2017/2018	FY 2018/2019	FY 2019/2020	MPS Total																																		
Caution - adult	23	12	17	52																																		
Caution - youth	1	0	2	3																																		
Charged/Summoned	242	182	180	604																																		
Outcome Pending	1	2	80	83																																		
Other Outcomes	1,813	2,175	2,739	6,727																																		
<b>MPS Total</b>	<b>2,080</b>	<b>2,371</b>	<b>3,018</b>	<b>7,469</b>																																		

<p><b>6. Impacts outside the Equality Act 2010</b></p> <p><b>What other groups might be affected by this policy, project, decision or activity?</b></p> <p>There is the potential for a positive impact for non-binary people, who may experience hate crime in the form of arson, due to their sexual orientation or gender-reassignment status.</p> <p>Positive impact for high fire risk individuals. This includes people: who have a reduced ability to respond to an alarm or fire, escape in the event of a fire occurring, or who have Characteristics associated with an increased risk of experiencing an accidental fire in the home. This is in line with the London Safety Plan 2017 prevention and protection aim LSP45. LSP45 states that "We will explore the use of innovative solutions to detect and suppress a fire to support independent living in the home for our most vulnerable residents."</p>
---

<sup>17</sup> This is Local London (2008), Staff Reporter, <https://www.thisislocallondon.co.uk/news/2058929.homophobic-arson-attack-victim-tells-of-his-pain/>

7. Legal duties under the Public Sector Equality Duty (s149 Equality Act 2010)	
How does this work help LFB to:	
<b>Eliminate discrimination?</b>	The smoke alarm specification will lead to the provision of approximately 65,000 smoke alarms and related products to HFSV recipients. Other important elements of the HFSV include: verbal guidance, literature provision and risk assessment, which when combined with fire detection lead to a demonstrable reduction in fire risk in the most vulnerable demographic groups, including specific protected characteristic demographic groups.
<b>Advance equality of opportunity between different groups?</b>	An mitigating action will be taken to ensure that people with age related conditions that might impact their capability to carry out HFSVs (from a staff perspective); or empower recipients of HFSVs to manage their own fire safety, which will support them to continue to live independently in their own.
<b>Foster good relations between different groups?</b>	Smoke alarms and related products are life protection devices. All groups: those at a high risk from fire (80% of HFSV recipients), those at low risk from fire (20% of HFSV recipients), those in who have one or more protected characteristic and those without protected characteristics are all equally provided with the same level of fire detection during a HFSV. This includes testing existing alarms and fitting alarms in all areas of risk (including living rooms and bedrooms). Although it cannot be said that the provision of smoke alarms and related products on their own fosters good relations between different groups, other components of HFSV delivery do.

8. Mitigating and justifying impacts		
Where an <b>adverse</b> impact has been identified, what steps are being taken to <b>mitigate</b> it? If you're unable to mitigate it, is it <b>justified</b> ?		
Characteristic with potential adverse impact (e.g. age, disability)	Action being taken to mitigate or justify	Lead person responsible for action
Age	The specification will have a mandatory provision for large print versions of relevant literature to be available, on request.	Marvin Ikua
Disability	As identified in the last paragraph of the disability protected characteristic section, further engagement with stakeholders is necessary to supplement positive impacts for people with sensory impairments. This engagement can be carried during the planning and implementation phases of HFSV activity.	Marvin Ikua

	<p>The following stakeholders have been identified:</p> <ul style="list-style-type: none"><li>• Visually impaired and blind charities</li><li>• Hearing impaired and deaf charities</li><li>• Staff members who are fluent in sign language and are experienced with delivering HFSVs to people with sensory impairments.</li><li>• Other staff members who deliver or manage the delivery of HFSVs to people with sensory impairments.</li></ul>	
--	---	--

### 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.

