

Report title

Licence to Operate – Incident Command

Report to	Date
Operational Delivery Directorate Board	17 November 2021
People Board	25 November 2021
Commissioner's Board	14 December 2021
Deputy Mayor's Fire and Resilience Board	18 January 2022
London Fire Commissioner	

Report by	Report number
Interim Assistant Director, Training and Professional Development	LFC-0638

Protective marking: **NOT PROTECTIVELY MARKED**

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I agree the recommended decision below.



Andy Roe
London Fire Commissioner

Date **This decision was signed
remotely on 01 February 2022**

Executive Summary

This report introduces the concept of a Licence to Operate (hereafter Licence or L2O). It is proposed that a Licence will address the risk of London Fire Commissioner (LFC) operational staff not being trained and assessed to meet the standards required to ensure they can carry out their operational activities competently and safely. A number of reports have identified this as a risk, namely, Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS), '*Fire and Rescue Service: Effectiveness, efficiency and people 2018/19 - An inspection of London Fire Brigade*'; Phase 1 of the Grenfell Tower Inquiry; The Independent Review of Training; Mayor's Office for Policing and Crime (MOPAC) Review of Delegate Throughput for Babcock Training 2018/19.

The L2O concept will also be used as part of the Organisational Learning Model which is currently being progressed. This model will lay out competence levels for all staff at all levels in the LFC and will include skills, behaviours, qualifications, knowledge and experience required for each learning specification produced for each role. Where L2O principles are agreed around an area of competence, these will be clearly laid out in the specifications to give clarity to individuals and managers as to the expectations of them.

L2O is intended to be used to support operational staff in remaining competent and safe across all areas of operations. L2O will focus initially on those operational activities which are of greatest risk to the LFC, namely Incident Command. Subject to agreement, subsequent reports will recommend L2O requirements for further operational areas. When fully implemented, L2O will be the default management tool used to ensure that required standards are met in all operational training and assessments. The report highlights that only a very small number of staff are ever expected to be outside of Licence requirements and that any resulting impact on service delivery will be of minimal risk. Staff outside of Licence requirements for Incident Command will be taken off the run and this report indicates how they will be supported by the LFC in their return to operational duties.

Recommended Decisions

For the London Fire Commissioner

That the London Fire Commissioner agrees:

1. The introduction of Licence to Operate requirements for Incident Command, encompassing the training and assessments framework identified in this report.
2. That Licence to Operate – incident command be implemented from 1 April 2022 to allow for policy consultation.

Introduction and Background

1. In the report titled *'Fire and Rescue Service: Effectiveness, efficiency and people 2018/19 - An inspection of London Fire Brigade'*, the HMICFRS noted that:

'The brigade has a significant backlog of training for staff in risk-critical skills such as incident command and emergency fire engine driving. Some people haven't had continuation training in these skills for many years. There is no individual reassessment of competence for incident command. The brigade should act immediately to address this.'

2. An Independent Review of Training, conducted by Ribband Star Consultancy Limited in 2019, also provided a number of recommendations relating to:
 - Incident Command Training and Revalidation; and
 - Provision of Incident Command training for those acting up from Firefighter.
3. The LFC Transformation Delivery Plan (TDP), which encompasses issues identified by the Grenfell Tower Inquiry Phase 1, the HMICFRS inspection findings and the Independent Review of Training recommendations, sets out the need for:
 - Increased focus on Incident Command to improve leadership, training and performance management;
 - Integration of National Operational Guidance (NOG).

4. A MOPAC Review of Delegate Throughput for Babcock Training 2018/19 highlighted the following risk:

'Lack of strategic direction impacts upon the ability to plan for future training needs, and lack of policy on allocating individuals onto courses, rescheduling attendance and people working out of ticket impacts upon the effectiveness of the Babcock training process.'

5. This report gives an update on progress that has been made to date with regards to meeting the HMI's targets for Incident Command training and points towards a preparedness to fully adopt L2O arrangements for Incident Command from 1 April 2022.
6. The HMI's target is for all eligible staff at Levels 1 – 4 to be validated or revalidated. Their target excludes staff that are unavailable. Unavailability can be because of sickness or secondment.
7. An indication is given later in this report of progress made, and work being done, in other training and assessment areas (Driving, Breathing Apparatus, Immediate Emergency Care) as these are also a priority in terms of addressing risk. Reports on these skill areas that demonstrate training confidence levels will follow and will recommend implementation dates.
8. The first L2O to be implemented will be the Incident Command Licence.
9. The vision of L2O is to develop a framework of required validation/revalidation training and assessments across a wide range of operational skill areas. Similar reports on training competence levels and implementation dates will follow for other skill areas and paragraphs 10 –11 give an indication of these. The skill areas agreed as part of the L2O concept will form part of the learning specifications for all affected roles, as they are developed.

The Best People and the Best Place to Work

10. A framework is required to inform those areas of operations that L2O will apply to. The National Fire Chiefs Council (NFCC) has developed a Fire Professional Framework (FPF) which recommends five strands that identify an effective Fire and Rescue Service, one of which is Operational Competence. There are eight identified operational areas considered essential to competence and safety:

- Command and Control;*
- Driving;
- Casualty Care;
- Breathing Apparatus;
- Hazardous Materials;
- Working at Height;
- Water (including Water Rescue and pumps); and
- Extrication and Rescue.

*To align the above with existing LFC terminology, Command and Control is hereafter referred to in this report as Incident Command.

11. The FPF is written from a national perspective and signposts those areas of operations that Fire and Rescue Services should be considering strategically in their programmes of training and assessments. It is anticipated that L2O will use the flexibility afforded by the FPF to encompass additional areas of operations and competencies not specifically addressed in the FPF; for example, Specialist Skills and training innovations such as the planned Urban Firefighting course are expected to incorporate elements that would be subject to Licence requirements.
12. The L2O will be a key part of the People Board's mission to improve organisational capability by improving our people's capability. The L2O meets the needs of one of the People Board's Strategic Priorities (*Be well **trained** and developed so that people can maximise their **talent** and fulfil their true potential in the Brigade*).
13. A number of UK FRSs have developed similar Licence approaches.
14. Within LFC, acquisition courses are the recognised tool used to provide staff with initial training and assessment in new skills, knowledge and understanding. Revalidation is the tool used to periodically assess staff against their expected standards of competence. In the case of Incident Command, staff should be assessed or "revalidated" every two years in line with NOG. Where transferees have completed recognised accredited training before joining LFB, their dates for revalidation will be off set accordingly against the date of completion of their last recognised acquisition or revalidation course. See Appendix 1.
15. Work has been done to implement Incident Command training at all levels and the majority of staff are Licence compliant, sufficient for the LFC to meet its operational obligations. Table 3 in paragraph 31 indicates current confidence levels for Incident Command.
16. Compliance requirements for Driving, IEC, and Breathing Apparatus are currently being agreed. In advance of the reports to follow this one, Table 4 in paragraph 40 gives an indication of confidence levels in training for these skill areas using current course codes.
17. As current compliance and training forecast levels show, it will be relatively rare for a member of staff to be taken off the run because of unsuccessful attendance on a course and, where this occurs, a range of support mechanisms under the auspices of PN 954 Revalidation of Incident Command will be resourced to support a return to operational duties.

Seizing the Future

18. LFC courses and approach to Incident Command should be aligned to NOG, as this delivers a consistent approach to a defined set of standards, guidance and principles. To further ensure that all possible steps are taken to ensure staff are supported in maintaining their Licences it is anticipated that implementation of L2O arrangements will occur alongside a review of relevant policies such as PN 867 Managing attendance on training courses.

Delivering Excellence

19. The adoption of the recommendations in this report supports the implementation of the consolidated Grenfell Tower and Her Majesty's Inspectorate (GT/HMI) Action Plan and will improve the effectiveness of the LFC by addressing the key elements of the safe person concept in ensuring:

- LFC provide the structure to maintain the skills, knowledge and competence of firefighters, their supervisors, managers and commanders in those technical and operational matters necessary to maintain safe and effective operations at incidents; and
- The establishment of suitable arrangements for the maintenance and recording of the Incident Command skill and competence of supervisors, managers and commanders.

20. Improvements have been made to Incident Command training and these will be supported by L2O arrangements.

Outward Facing

21. The adoption of the Licence will assure Londoners that the people who deliver operational response activities to them are trained to the required standard in compliance with a recognised awarding body. It will also provide assurance to the London Fire Commissioner, Mayor's Office, Home Office and MOPAC that LFC has the right people with the right skills to perform their role competently and safely to protect the communities it serves.

Risk Management

22. This report addresses risk management by:

- Clearly defining minimum training and assessment requirements for Incident Command;
- Comparing the training and assessments people undertake against those requirements (without the counting errors described above);
- Proposing a Licence system that will form a key part of the Organisational Learning Model;
- Proposing a date from which the Licence training requirements for Incident Command can be applied (1st April 2022) that allows for policy consultation.

23. When people are promoted to the rank of Leading Firefighter, and up to the rank of Station Officer, the promotion process includes a Tactical Decision Exercise (TDE). When people are promoted to the rank of Station Commander and above, the promotion process includes an Incident Command Exercise (ICE). Neither of these exercises are acquisition.

24. There are four levels of Incident Command. Staff at different ranks need to be trained at different levels, as outlined in Table 1 overleaf:

Table 1: Levels of Incident Command by rank

Rank	Incident command Level(s)
Leading Firefighter	1
Sub Officer	1
Station Officer	1
Station Commander	2
Group Commander	2
Deputy Assistant Commissioner	3 and 4
Assistant Commissioner	3 and 4
Deputy Commissioner	4
Commissioner	4

25. The requirements outlined above also apply to staff acting up to a higher rank. For example, a Firefighter acting up to the rank of Leading Firefighter needs to be a trained Level 1 Incident Commander, and a Group Commander acting up to the rank of Deputy Assistant Commissioner needs to be trained at Level 3. If they were to stop acting up, and to revert to the rank of Group Commander, they would need to be trained at Level 2.
26. Table 2 below sets out the requirements to maintain competence for each level of Incident Command.

Table 2: Current Incident Command Training and Assessment

Level	Incident Command Training		
	Acquisition	Maintenance	Revalidation
Level 1	✓	✓	✓
Level 2	✓	✓	✓
Level 3	✓	✓	✓
Level 4	✓	✓	✓

27. It is proposed that the L2O requirement for Incident Command is successful completion of an acquisition course relevant to a person's rank followed by successful revalidation every two years. This is consistent with NOG. Staff who are competent at their current rank will not be required to retrospectively undertake any revised acquisition training. These staff will gain their Licence via revalidation.
28. Maintenance training represents the LFC's commitment to providing workplace training to its staff and is provided continuously via a range of mechanisms. It does not form part of the L2O requirements, but it will form part of their continuous professional development in support of their competence, safety, skills, knowledge, and understanding. Staff are expected to complete maintenance training which supports successful revalidation outcomes.
29. The number of people requiring training, as referred to in Table 3, refers not just to staff who are operational but also to all others that are eligible for training under the Role to Rank agreement. This includes, for example, staff in specialist roles such as Fire Safety, those on secondment, or on long term sick. Inevitably, this then means that there will always be a small shortfall caused in part by staff that are eligible to receive training but who cannot fulfil the training obligation.
30. To address training shortfalls and ensure that the HMI's target for full compliance is met by December 2021, the Training & Professional Development Department has prioritised delegate throughput on acquisition and revalidation courses at all levels of Incident Command. Level 2 acquisition training is expected to be in place in April 2022 and interim arrangements have been made with the Fire Service College to meet demand. Level 3 training is currently being piloted (July to November) and now Level 4 training is provided by an external training company.
31. Table 3 shows the current L2O position for Incident Command.

Table 3: Incident Command Licence position as at 8 October 2021 for available station-based staff only

Level	No. of staff	Of which trained / assessed	%	Training / assessment required	No.	Of which booked by 31 st Dec. 2021	Remaining delegate spaces	Detailed expected training position by 31 st Dec. 2021	Summary expected training position	Expected % position 31 st Dec. 2021 if typical through put levels persist
1	1205	1122	93 %	Acquisition	44	2	29	25	1186	98%
				Revalidation	39	1	117	39		
2	198	184	93 %	Acquisition	1	0	17	1	195	98%
				Revalidation	13	0	12	10		
3	23	22	96 %	Acquisition	0	0	0	0	23	100%
				Revalidation	1	1	0	1		
4	10	9	90 %	Acquisition	1	1	0	1	10	100%
				Revalidation	0	0	0	0		

32. RAG status is proposed to denote an individual's L20 position:

GREEN: Those staff that hold a licence to operate i.e. have completed acquisition or revalidation within the last two years.

It is anticipated that, as is currently the case, the vast majority of staff will be in this category.

AMBER: Those staff that hold a licence to operate i.e. have completed acquisition or revalidation within the last two years, but who have less than three months before their licence expires.

The amber status serves two purposes. It is designed to assist the Training & Professional Development department with allocation of courses. It is also there to support individuals' planning with advance notice of their training and work commitments.

RED: Those staff that do not hold a licence to operate i.e., have not successfully completed acquisition or revalidation within the last two years.

It is anticipated that, as is currently the case, only a very small number of staff will ever be in this category. The risk to the organisation will be as low as reasonably practicable and sufficient for it to meet its operational obligations.

33. It is proposed that the staff in the Red category be taken "off the run" from 1 April 2022. Firefighters risk assessed to act up to the role of Leading Firefighter will remain on the run as Firefighters. Leading Firefighters (D) and competent Leading Firefighters and above will be taken off the run until they have undertaken Licence compliant validation or revalidation.
34. Only a very small number of staff are ever expected to be Red and the impact on service delivery is expected to be very low. These staff will be prioritised for development and assessment. Oversight of these numbers will be provided by the Incident Command Competence Oversight Board (ICCOB).
35. Following unsuccessful attendance at an acquisition or revalidation course, support will be offered to staff to help ensure that they meet the required standard. This comes under the auspices of PN 954 Revalidation of incident command. Actions may include, but are not limited to:
 - Further support followed by revalidation
 - Personal Development Plan with set time frame
 - Referral to Incident Command Competence Oversight Board
 - Incident Command Courses
 - DaMOP Incident Command related training
 - Local Management Support
 - Operational Shadowing Options
36. If this concept is agreed, then the terms of reference for the ICCOB will need to be reviewed.
37. To facilitate this work, Training & Professional Development Department will produce Licence reports that will detail individual status and enable the prioritisation of the appropriate courses and/or assessments.
38. To further facilitate this preliminary work is being done with IT to explore options for recording on StARS staff licence compliance in a range of skills e.g. Breathing Apparatus, Immediate Emergency Care. This will assist staff with monitoring their own needs for training. Initial discussions with Babcock confirm that there are possibilities to better utilise the Learning Management System (LMS) and that LFB Diary may also be able to support performance reports.

Training capacity

39. It is imperative that sufficient training capacity exists to enable people to acquire and then maintain their Licences. An analysis has been carried out to estimate the amount of training required, as well as the availability of resources to deliver this requirement, in terms of:
 - Training course capacity (which includes the availability of trainers, venues and training equipment)
 - Affordability

- Our ability to release staff to attend training courses (i.e. PROP capacity)

Emergency Response Driving, Breathing Apparatus, Immediate Emergency Care

40. Work is still being done to complete and agree Licence compliant training in each of these areas and full reports on these will follow. However, an indication is given here of the current numbers of staff who have received Licence compliant training in Emergency Response Driver Training (Appliance/Car), Immediate Emergency Care (IEC), Breathing Apparatus 2 Day (BA). "Compliant" will be defined for each of the skill areas in following reports and will be subject to agreement with SMEs and affected stakeholders.

Table 4: Status of Driving, IEC and BA as at 10.9.21

Skill Area	No. eligible staff	No. staff compliant	% staff compliant
ERDT – Appliance	1715	1677	98%
ERDT - Car	293	267	91%
IEC	4391	2444	56%
BA	4366	4180	96%

41. Driver training is likely to be in a good position to adopt a Licence approach soon. The shortfall in IEC is likely to have been caused in part by the release of Firefighters to driver assist during the Covid pandemic and also the recent suspension by LAS of a number of their courses, again caused by capacity issues stemming from their efforts during the last eighteen months in connection with the pandemic. BA is likely to be in a good position to adopt a Licence approach soon.

Communication

42. Once the concept is agreed, effective communication to the workforce about the approach will need to be provided so that staff fully understand the implications of L2O and their role in maintaining the requirement. It is anticipated that this will be delivered through a variety of different channels such as Hotwire, Shout Magazine, Staff briefings and Management workshops to facilitate a cascaded approach of how we communicate to the workforce.
43. Staff will be responsible for ensuring that they hold a valid L2O.

Costs

44. Work has been done by Training Performance to establish the costs to the LFC of DNAs during the period 2020/21. Covid did impact on DNAs but nonetheless the period April 2020 – June 2021 saw a total of 877 Incident Command training course withdrawals at a cost to the LFC of £457,000. Implementation of Licence requirements are expected to increase delegate participation. Course delivery by the Training & Professional Development Department and participation through 2021/2022 has already increased to such an extent that the impact on staff availability is expected to be minimal when Licence arrangements are

implemented in April 2022.

45. It should also be noted that there is the potential for costs to be incurred as a result of staff being unable to perform operational duties as a consequence of not meeting their L2O. Any significant shortfalls would need to be covered by pre-arranged overtime but as mentioned above, this number is expected to be minimal. Another indirect factor to note is the forthcoming pension remedy and what impact that will have on staff numbers which may then further be impacted by staff not being able to perform operational duties.

Conclusion

46. The introduction of a L2O for Incident Command will support people in carrying out their Incident Command activities competently and safely. The Licence approach can be clearly understood by staff, line managers, and training providers.
47. The endorsement of the Licence approach will also address actions identified in Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS), '*Fire and Rescue Service: Effectiveness, efficiency and people 2018/19 - An inspection of London Fire Brigade*'; Phase 1 of the Grenfell Tower Inquiry and the Independent Review of Training.

Alternative Options Considered and Consultation

48. A phased approach could be adopted. It is possible that during an interim "grace" period staff that do not meet Licence requirements, but who do have other training qualifications, could be allowed to remain on the run until they have completed compliant acquisition or revalidation. Given the now very high levels of compliance across all levels of Incident Command this seems an unnecessary delay in this risk critical aspect of training transformation and could inadvertently lead to delays in staff being revalidated. This is not now the safest option for the organisation.

Objectives and Expected Outcomes

49. The objective of this report is to seek agreement to the implementation of the L2O for Incident Command with effect from April 2022. This will lead to a direct improvement in the ability of affected staff groups to carry out their roles safely and competently.

Impacts

Equality Impact

50. 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.
51. 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.
52. 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.

53. 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.
54. 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:
- i. remove or minimise disadvantages suffered by persons who share a relevant protected characteristic where those disadvantages are connected to that characteristic;
 - ii. 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;
 - iii. 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.
55. 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.
56. 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:
- i. tackle prejudice, and
 - ii. promote understanding.
57. The December 2019 HMICFRS Inspection Report graded LFB as 'requires improvement' in the 'People' section of the inspection, and 'inadequate' on some areas of training provision, including noting that there is 'no corporate equality or diversity training'. Although there are limited equality implications arising from the recommendations in this specific report, the context in which LFB operates is important in terms of recognising where there are advances in equality, diversity and inclusion to be made.
58. The Brigade's new inclusion strategy, the 'Togetherness Strategy' launched on 1 July 2020, and contains several objectives relating to training and education of staff, including a commitment to ensure that inclusion is built into existing and new training content, fit to train requirements and leadership programmes.

59. An Equality Impact Assessment (EIA) has been undertaken and is attached at Appendix 2.
60. Consultation with the Inclusion Team has taken place. The outcomes of this consultation have been considered when coming to the conclusions in this report.

Procurement and Sustainability

61. There is no business case in this report so no comments from Procurement have been sought. A Sustainable Development Impact Assessment (SDIA) has been completed, and the outcome was a sustainability risk rating "L" (see Appendix 3).

Strategic Drivers

62. Acceptance of this report supports the London Fire Commissioner's Transformation Development Plan. L2O provides a mechanism for addressing the NFCC's Fire Professional Framework and will improve Firefighter safety through improved training and assessments. The Licence directly supports the strategic pillar Delivering excellence.

Workforce Impact

63. A total of 13 engagement sessions have been held. These sessions encompassed operational people on fire stations with varying factors including numbers of pumps; additional specialist skills; operational demands and equally divided across each of the four Brigade areas.
64. Staff engagement has been carried out and is broadly supportive of the approach as indicated below:

A representative group of 79 staff (response rate 65%) completed a survey of views on L2O in October 2020. The results of that survey indicate a majority of staff support the L2O concept and the highlights are as follows:

- 91% either strongly agree or agree with understanding why the L2O concept is being considered
- 87% either strongly agree or agree with supporting the L2O concept

65. Consultation with representative bodies will be undertaken on the corresponding policies where revisions are proposed. Informal discussions indicate that they are broadly supportive of the approach.

Finance comments

66. This report recommends the introduction of L2O requirements for Incident Command with effect from 1 April 2022.
67. It is expected that there will be a net-nil impact financially of operating a Licence to Report scheme. This assumption is underpinned through an increased use of training in order to drive higher competencies across the operational teams, though there will be savings generated by greater attendance at booked training sessions leading to a lower requirement to re-book places. This must be closely monitored through the year, through the budget monitoring cycle and any risks of overspend identified early and mitigating actions put in place. Mitigating actions may be through the reduction of training or a request for additional resources to fund additional training.

Legal comments

68. 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.
69. 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").
70. Paragraph 3.1 of Part 3 of the said direction requires the Commissioner to consult with the Deputy Mayor as far as practicable in the circumstances before a decision is taken on (inter alia) any "[c] decision that can be reasonably considered to be novel, contentious or repercussive in nature, irrespective of the monetary value of the decision involved (which may be nil)".
71. As the subject of this report could reasonably be considered to be novel, contentious or repercussive in nature, the Deputy Mayor will be consulted prior to the Commissioner introducing L2O requirements for Incident Command.
72. The General Counsel notes that the introduction of a L2O model will enable the LFC to support operational staff in remaining competent and safe across all areas of operations. The focus initially shall be on those operational activities which are of greatest risk to the LFC, starting with Incident Command. When fully implemented, Licence to Operate will be the management tool used to ensure that required standards are met in all operational training and assessments.
73. The statutory basis for the actions proposed in this report is provided by section 7 of the Fire and Rescue Services Act 2004 ("FRSA 2004"). Under 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. Section 7 (2)(b) FRSA 2004 gives the Commissioner the power to secure the provision of training for personnel.
74. Furthermore by introducing the Licence to Operate, the LFC shall be addressing its Transformation Delivery Plan (TDP), which encompasses issues identified by the Grenfell Tower Inquiry Phase 1, the HMICFRS inspection findings and the independent review of training recommendations including the need for increased focus on Incident Command to improve leadership, training and performance management and Integration of NOG.

List of Appendices

Appendix	Title	Protective Marking
1	Licence to Operate Incident Command Course Requirements	
2	Equality Impact Assessment	
3	Sustainability Impact Assessment	

Appendix 1: Licence to Operate Incident Command Course Requirements

Level	Licence to Operate Requirements		
	Acquisition*	Maintenance**	Revalidation
Level 1	IC1LFT, IC1LFP IC1SUB IC1STN (OFCSTD @ FS College)	Command related DaMOP training OFCSTM (Stn. O.s, 1 day) OFCSTW (Stn. O.s, 2 day)	OFCSTR
Level 2	IC2SCA <i>from Nov. 21</i> (TFCSTD @ FS College)	Command related DaMOP training TFCSTM TFCSTG	TFCSTR
Level 3	IC3ATA*** IC3ATB/C/D/E/F/G/H/I/J AFCSTD @ FS College	Command related DaMOP training	SFCSTR
Level 4	IC4STC (replaces SFCSTD @ Peter Stanley)	Command related DaMOP training	TBC

* Or equivalent (e.g., for transferees); staff competent in role will not be required to retrospectively complete these acquisition courses. Note that Level 2 is due to be piloted from Nov. '21 and that FS College courses are expected as an interim to meet acquisition needs.

** L2O will be dependent on Acquisition and Revalidation and will not be measured against Maintenance.

*** Level 3 acquisition SFJ Level 6 pilot July – November 2021 preceding rollout.

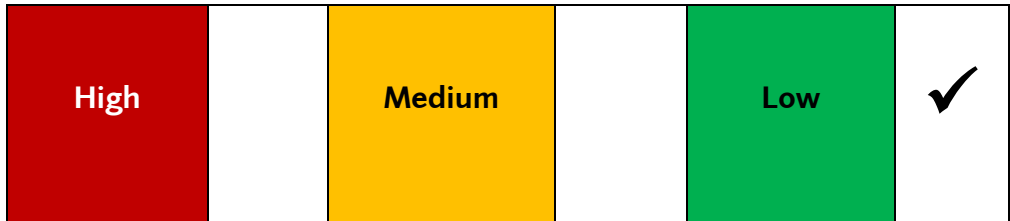
Equality Impact Assessment (EIA) Form

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

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

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

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



2. Contact details	
Name of EIA author	SC Danny Slay
Department and Team	Training & Professional Development

3. Aim and Purpose	
What is the aim and purpose of the policy, project, decision or activity?	To provide a policy to ensure all uniformed staff attend acquisition and revalidation courses for Incident Command, Breathing Apparatus, Driving and Immediate Emergency Care and the consequence measures applied to them if they do not attend within the requisite timescales or who do not demonstrate the required standard.
Who is affected by this work (all staff, specific	All uniformed staff

department, wider communities?)	
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4. Equality considerations: the EIA must be based on evidence and information.	
What consultation has taken place to support you to predict the equality impacts of this work?	<p>Undertaken engagement with key stakeholders within Operational Policy, Fire Stations, Health & Safety and Training.</p> <p>Undertook staff engagement with operational staff from a variety of stations.</p>

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 regular access to a computer or smart phone.</i>
Age (younger, older or particular age group)	neutral	This policy will apply to all operational staff regardless of age to ensure they are competent to undertake their role.	

<p>Disability</p> <p>(physical, sensory, mental health, learning disability, long term illness, hidden)</p>	<p>Positive</p>	<p>Existing courses already take account of learning disabilities. The licence is not adding courses, just ensuring they are completed within the requisite timescales. With regard to long term illnesses, the Licence will ensure those returning are provided the right training and assessment prior to being required to undertake operational duties.</p>	
<p>Gender reassignment</p> <p>(someone proposing to/undergoing/undergone a transition from one gender to another)</p>	<p>neutral</p>	<p>This policy will apply to all operational staff regardless of gender to ensure they are competent to undertake their role.</p>	
<p>Marriage / Civil Partnership</p> <p>(married as well as same-sex couples)</p>	<p>neutral</p>		
<p>Pregnancy and Maternity</p>	<p>Positive</p>	<p>The Licence to Operate will ensure any member of staff returning to work following maternity leave will not be required to undertake operational duties without having attended the requisite courses as detailed by the policy.</p>	

Race (including nationality, colour, national and/or ethnic origins)	Neutral	This policy will apply to all operational staff regardless of race to ensure they are competent to undertake their role.	
Religion or Belief (people of any religion, or no religion, or people who follow a particular belief (not political))	Neutral	This policy will apply to all operational staff regardless of their religious beliefs to ensure they are competent to undertake their role.	
Sex (men and women)	Neutral	This policy will apply to all operational staff regardless of their sex to ensure they are competent to undertake their role.	
Sexual Orientation (straight, bi, gay and lesbian people)	Neutral	This policy will apply to all operational staff regardless of their sexual orientation to ensure they are competent to undertake their role.	

6. Impacts outside the Equality Act 2010
What other groups might be affected by this policy, project, decision or activity?
Consider the impact on: carers, non-binary people, people with learning difficulties, neurodiverse people, people with dyslexia, autism, care leavers, ex-offenders, people living in areas of disadvantage, homeless people, people on low income/in poverty.
With regard to staff with neurodiversity needs, under the "Disability" category in this report, it states that learning disabilities are taken into account on courses. On the issue of neurodiversity, this is currently being looked into in liaison with the Learning Support Team and will be explored more fully in the coming weeks in order to evidence this. The EIA will be updated in due course.

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

How does this work help LFB to:

Eliminate discrimination?	Ensures all staff are required to undertake the same training and assessment for their rank regardless of any protected characteristics.
Advance equality of opportunity between different groups?	
Foster good relations between different groups?	

8. Mitigating and justifying impacts

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

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

Appendix 3: Sustainable Development Impact Assessment Checklist

Project Name/Policy Name & No: Operational Licence - Training

Contact Person: SC Danny Slay

Date completed: 30th September 2020

Please send through the completed checklist with a copy of the project PID or the draft policy to environment@london-fire.gov.uk. For existing policies undergoing minor amendments, please send through a marked up copy of the policy, with the original SDIA.

Other impact assessments completed		Yes	No		
1. Has an Equalities Impact Assessment been completed?		<input checked="" type="checkbox"/>	<input type="checkbox"/>		
2. Has a Health, Safety and Wellbeing assessment been completed?		<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Environmental Impacts					
3. Will this consume any of the following (please tick those that apply and state how and if this would increase or decrease our consumption):					
Gas	<input type="checkbox"/>	Electricity	<input type="checkbox"/>	Water	<input type="checkbox"/>
Petrol or diesel	<input type="checkbox"/>	Hazardous chemicals	<input type="checkbox"/>	Other natural resources e.g. timber	<input type="checkbox"/>
Comments:					
This policy does not consume any of the above.					
4. Will this produce or reduce our production of (please tick those that apply and describe what and how):					
Non-hazardous waste	<input type="checkbox"/>	Hazardous waste (see PN 862)	<input type="checkbox"/>	pollutants to air, land or water?	<input type="checkbox"/>
Comments:					
This policy will not impact or reduce waste production					
5. Will this impact (positively or negatively):		Yes	No		

a. Operational/business travel by staff	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Travel/deliveries by our suppliers	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Environmental protection at incidents	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. a Site of Special Scientific Interest	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Gardens or other wildlife at stations/brigade sites (e.g. nesting birds or bats)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments:		
Not Applicable		
Procurement	Yes	No
6. Will this result in the purchase of goods, services or works or influence how they are procured?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Is this for a purchase of greater than £1m?	<input type="checkbox"/>	<input type="checkbox"/>
g. Will this use/result in a tender for manufactured goods such as electronics, textiles, and building materials?	<input type="checkbox"/>	<input type="checkbox"/>
h. Will this service require low skilled/low paid employees?	<input type="checkbox"/>	<input type="checkbox"/>
i. Will the goods consume utilities or consumables?	<input type="checkbox"/>	<input type="checkbox"/>
j. Does this involve major works taking place?	<input type="checkbox"/>	<input type="checkbox"/>
k. If so are BREEAM and Ecological surveys required?	<input type="checkbox"/>	<input type="checkbox"/>
l. Will this support future cost avoidance?	<input type="checkbox"/>	<input type="checkbox"/>
m. Could all or part of the purchase be provided by small or local businesses?	<input type="checkbox"/>	<input type="checkbox"/>
n. Could this be delivered by a voluntary/community sector organisation?	<input type="checkbox"/>	<input type="checkbox"/>
o. Has a Request For Tender been submitted to Procurement through hotwire?	<input type="checkbox"/>	<input type="checkbox"/>
Comments:		

The course mentioned within this policy is within the Current Babcock contract.

For the SD Team to complete:

Policy sustainability risk rating: L

Inputs/outputs/ impacts to address in Full SDIA: **This policy is considered to be of low environmental impact, not further action is required.**

Date completed: 18/10/20