

Equality Impact Assessment (EIA) Form

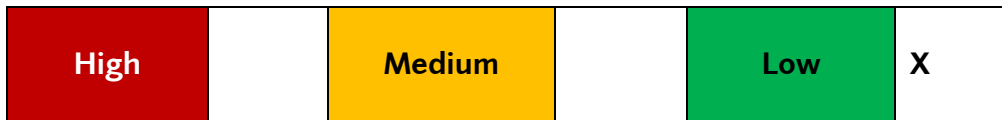
The **purpose** of an EIA is to give **as much information as possible** about potential equality impacts, to demonstrate we meet our **legal duties** under the Equality Act 2010.

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

Once you open the template please save it on your OneDrive or SharePoint site. Do not open the template, fill it in and then click Save as this will override the template on Hotwire.

1. What is the name of the policy, project, decision, or activity?
Policy number 800 –Management of Operational Risk Information

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	Richard Field
Department and Team	Central Operations
Date of EIA	December 2021

3. Aim and Purpose	
What is the aim and purpose of the policy, project, decision or activity?	<p>Section 7 of the Fire and Rescue Services Act 2004 requires fire and rescue authorities to make provision for the purposes of (a) extinguishing fires in its area and (b) protecting life and property in the event of fires in its area. Section 7(2)d requires that in making provision to extinguish fires and protect life and property, the fire and rescue authority must make arrangements for obtaining information needed for those purposes.</p> <p>Therefore, it is the policy of the London Fire Brigade to ensure efficient arrangements are in place for the gathering, storage and dissemination of operational information that will assist in the</p>

	<p>successful resolution of an incident. These arrangements are contained within PN800 - Operational Risk Information. Currently the Brigade collects information for:</p> <ol style="list-style-type: none"> 1. High Risk locations 2. Risk specific (operational risk to firefighters) 3. Occupancy Specific (life risk to occupants) 4. Building Specific (risk to both staff, public and firefighters) 5. Environment Specific (risk to staff and public) <p>In summary, the main areas of change to the exiting policy are:</p> <ol style="list-style-type: none"> 1. Additional information relating to local fire safety teams and operational risk information in Stage 3. 2. An amendment to the e-PIP which will allow for floors below ground to be distinguished from ground and above. 3. Additional information requested and a new central Brigade contact e-mail for responsible persons and building owners in appendix 4. 4. Following the interim assurance review of PN800, a new appendix 5 which summarises the role and responsibilities within the operational risk information process. 5. Three additional Premises Risk Assessment (PRA) criteria's which mean the brigade records information for buildings with 30 floors and above and separates general fire safety issues in to commercial and residential, emphasising the importance of residential issues.
<p>Who is affected by this work (all staff, specific department, wider communities?)</p>	<p>The implementation of PN800 will affect station staff and the public as the Brigade is recording more information about building types and visiting them more frequently and ensuring the information the Brigade holds is accurate and available at an incident. The amendments are increasing the information held for high-rise buildings. PN800 form part of the DaMOP cycle for staff so they are kept up to date with the requirements set out in the policy.</p>

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

<p>What consultation has taken place to support you to predict the equality impacts of this work?</p>	<p>Consultation included Strategy and Risk, Fire Safety Regulation, Health and Safety, FBU, BJCHSW, Area DAC's, General Counsel, Grenfell Tower Investigation Team, Training, ICT, Operational Policy and Assurance, Fire Stations.</p>
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5. Assessing Equality Impacts

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

Protected Characteristic	Impact: positive, neutral or adverse	Reason for the impact	What information have you used to come to this conclusion?
<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 age group)	Positive	<p>The amendments to the policy now increase the amount of information the Brigade has on high-rise premises, which will have a positive impact on all ages, but in particular those vulnerable age brackets (young and elderly) who live in residential high-rise accommodation.</p> <p>LFB data shows that older people are more likely to be victims of fire and rescue service incidents and are particularly vulnerable to fires, with 85 per cent of fatal fires involving someone over the age of 50 and 65 per cent of fatal fires involving someone over the age of 65. Those aged over 65 are evenly distributed across London. 49 per cent of over 65s living in urban areas which make up 30 per cent of London's area and 46 per cent of over 65s living in suburban areas.</p> <p>London's population, the number of Londoners aged 65 or over is projected to increase by 86 per cent between</p>	<p>English Housing Survey Households Report 2017/18 report examines the characteristics of households who live-in high-rise flats (i.e. in a block with six or more storeys) and how this differs from those who live in other types of dwellings (including houses and low-rise flats).</p> <p>Certain groups are more likely to live-in high-rise flats than others, e.g. renters more so than owners, younger people more so than older people, black, Asian and minority ethnic households more so than white households, and those who live in the most deprived areas.</p> <ul style="list-style-type: none"> • 1% of owner occupiers lived in a high rise flat, compared with 3% of private renters and 4% of social renters. • 5% of those aged 16 to 24 and 4% of those aged 25 to 34 lived in a high rise flat compared with 1% each of those aged 65 to 74 and 75+.

		<p>2019 and 2050, faster than younger age groups. Therefore, there will be a growing need for infrastructure that supports an ageing population, including accessible.</p>	<ul style="list-style-type: none"> • In general, households with a black, Asian or minority ethnic household reference person (HRP1) were more likely to live in a high rise flat, e.g. 3% of households with an Asian HRP and 7% with a black HRP lived in a high rise flat compared with 1% of households with a white HRP. • 4% of those in the most deprived areas live-in high-rise flats, compared with less than 1% of those in the least deprived areas.
<p>Disability (physical, sensory, mental health, learning disability, long term illness, hidden)</p>	<p>Neutral</p>	<p>Under the 1995 Disability Discrimination Act a disability is defined as '<i>a physical or mental impairment which has a substantial and long-term adverse effect on a persons' ability to carry out normal day-to-day activities</i>'.</p> <p>PN800 collects risk information in a number of locations where people with disabilities might reasonably be located, such as large hospitals, care nursing homes, extra care sheltered accommodation, premises where hoarding is present, high-rise buildings, care homes and health care premises with progressive horizontal evacuation.</p> <p>The significant amendments to PN800 is the increased score of high-rise buildings 30 floors and over and as result we are recording more information and visiting them more frequently.</p> <p>LFB's data shows that disability and poor mental health and mobility issues and taking prescription drugs increase your vulnerability to fire. Characteristics associated with disability are often found in older people who are found all over London and are proportional to the population density in each of the four-neighbourhood impact zones. People with disability are also likely to be more economically deprived and as such have risk factors associated with deprivation. LFB's data shows that if you</p>	<p>English Housing Survey Households Report: There were some differences in the likelihood of living in each dwelling type according to whether the household included someone with a long-term illness or disability.</p> <p>Households with someone who had a long-term illness or disability were more likely to live in low rise flats in blocks of three storeys or less (15%), and less likely to live in a flats in a block of either four to five (3%) or six to nine storeys (less than 1%), compared with other households (14%, 4% and 1% respectively).</p> <p>There was, however, no difference in the likelihood of living in a house or high-rise flat in blocks of 10 or more storeys between either type of household.</p> <p>Households with a wheelchair user were generally no more or less likely to live in low- or high-rise flats, than households with no wheelchair user.</p>

		<p>are poor you are more likely to have a fire. There are patches of deprivation across London with a bias towards the eastern side of London as well as some areas in North West London.</p> <p>With reference to 12:11 'vulnerability of persons in the premise and what guidelines are offered when gathering information – to support assessment for the access/egress to premises for disabled people? This will be contained within the responsible persons plan or risk assessment, because people move around, we can't keep an accurate record on our systems. Its for the responsible person to produce this for us ie the "premises information box" will contain this information.</p>	
<p>Gender reassignment (someone proposing to/undergoing/ undergone a transition from one gender to another)</p>	<p>Neutral</p>	<p>PN800 and the amendments to include information and visits for high-rise buildings has a positive impact on the public in general and does not adversely affect someone proposing to/undergoing/ undergone a transition from one gender to another. People going through these processes can come up against some negative views when engaging with Establishment organisations, therefore they may be reluctant to invite them into their homes, for fear of being judged.</p>	<p>Government Equalities Office – Trans People in the UK: The government does not accurately know the numbers for gender reassignment. No robust data on the UK trans population exists. The government tentatively estimates that there are approximately 200,000-500,000 trans people in the UK. The Office for National Statistics is researching whether and how to develop a population estimate.</p> <p>Since the Gender Recognition Act 2004 Act came into force, 4,910 trans people have been issued a Gender Recognition Certificate. 12% of trans respondents to the National LGBT survey who had started or completed their transition had successfully obtained one, and 7% of those who knew about them but did not have or had not applied for one said they would not be interested in obtaining one.</p> <p>The Government is clear that there will be no change to the Equality Act 2010, which allows service providers to offer separate services to males and females, or to one sex only, subject to certain criteria. These services can treat people with the protected characteristic of gender reassignment differently,</p>

			<p>or exclude them completely, but <i>only</i> where the action taken is a proportionate means of achieving a legitimate aim.</p> <p>Importantly, a service provider's starting point should be to treat a trans person in the gender they identify with, and to allow them to access services for that gender <i>unless</i> by doing so they would be unable to provide that service to other service users.</p>
<p>Marriage / Civil Partnership (married as well as same-sex couples)</p>	Neutral	<p>PN800 and the amendments to include information and visits for high-rise buildings has a positive impact on the public in general including married as well as same-sex couples</p>	<p>From National Statistics: Married or civil partnered remained the most common marital status in 2019, accounting for just over half (50.4%) of the population aged 16 years and over in England and Wales; the proportion is slowly declining over time for all ages except those aged 70 years and over. Females aged 70 years and over in particular were more likely to be married or divorced in 2019 than 10 years ago, and less likely to be widowed.</p> <p>Around 60% of the population were living in a couple in 2019, the majority of these were married.</p> <p>Cohabiting is more common among younger age groups; 69.2% of those aged 16 to 29 years who were living in a couple were cohabiting, while only 4.5% of those aged 70 years and over living in a couple were cohabiting.</p>
<p>Pregnancy and Maternity</p>	Neutral	<p>The gathering of risk information does include large hospitals which would have maternity facilities and residential locations such as high-rise buildings where you may reasonably expect pregnant people to be.</p> <p>Though no LFB data specifically relates to pregnancy or maternity risk factors associated with pregnancy and maternity such as reduced mobility and prescription drugs are known to increase an individual's risk to fire</p>	<p>English Housing Survey Households Report: The average (mean) size of households living in houses was 2.5 people, higher than both low rise and high rise flats (which each have an average household size of 1.8 and 1.9 people respectively), which is not surprising as houses are generally bigger.</p> <p>In 2017-18, approximately 708,0006 households lived in an overcrowded home. Six in ten (61%) overcrowded households lived in houses. The remainder lived in flats (35% in low rise flats; 5% in high rise flats).</p>

<p>Race (including nationality, colour, national and/or ethnic origins)</p>	<p>Neutral</p>	<p>PN800 and the amendments to include information and increased visits for high-rise building will have a positive impact on non-white people who are more likely to live in a flat.</p> <p>The Brigade encourages the engagement with the ethnic and cultural diversity of local informants and the public in order to assess risk, with literature in various languages and a new central brigade e-mail address to inform the Brigade of changes to property and risk.</p> <p>57 per cent of Londoners are white British, white Irish or other white ethnicity, with the remaining 43 per cent having a black, Asian or minority ethnicity (BAME). LFB's data shows that race does not have an impact on an individual's vulnerability to fire. The proportion of each category of race is relative to the size of that category's population in London. Though other risk factors such as economic deprivation and employment may be present in specific ethnic groups.</p>	<p>English Housing Survey Households Report: Generally speaking, households with a white household reference person (HRP) were more likely to live in a house and less likely to live in a flat, including high rise flats, than households with a HRP from an ethnic minority background. Households with a white (82%) or Asian (75%) HRP were more likely to live in a house than households with a other ethnic minority (52%) or black (48%) HRP. In contrast, just 1% of white HRP households lived-in high-rise flats, compared with 3% of Asian and 7% each of black and other ethnic minority HRP households.</p> <p>The findings were slightly different for social renters. Although white HRP social renters were generally more likely to live in a house and less likely to live in flats in blocks above three storeys, there were no differences in the likelihood of any minority ethnic group living in flats in blocks of three or less storeys</p>
<p>Religion or Belief (people of any religion, or no religion, or people who follow a particular belief (not political)</p>	<p>Neutral</p>	<p>The collections of risk information focus on building types and locations which have a cross section of society.</p> <p>It is known that the lighting of candles can increase someone's risk to fire.</p> <p>Additionally, though large gatherings can increase someone's risk to certain incident types the likelihood of such incidents is relatively low. Some areas of London hold higher numbers of a particular religious group, for example Barnet has the highest Jewish community</p>	<p>Office for National Statistics: London is the most diverse area within the UK when it comes to religious beliefs, with the highest percentage of people identifying as Muslim, Buddhist, Hindu or Jewish. The data from the census recorded that 48.4% of Londoners considered themselves to be Christian, 12.39% considered themselves Muslim, 5% Hindu, 1.82% Jewish, 1.5% Sikh, 1% Buddhist and 0.6% Other. A large proportion, 20.73% of respondents, stated that they followed no religion.</p>

		<p>numbers and New Malden the highest Korean population.</p> <p>The views of each person are equally valued and that for proportion of views purposes it may be necessary to direct engagement in highest populated areas, this is not to suggest that the views are of lesser or more value.</p> <p>Nearly half of London's residents, 48 per cent, give their religion as Christian.</p> <p>Muslims account for 14 per cent and all other religions total 12 per cent. People stating no religion make up the remaining 26 per cent. The proportion of Londoners who are Muslims or who have no religion has increased in recent years, while the proportion who are Christian has declined.</p> <p>Data shows that incidents in places of worship occur on average about once a month and result in one casualty every 10-25 incidents.</p>	
<p>Sex (men and women)</p>	<p>Neutral</p>	<p>PN800 and the amendments to include information and visits for high-rise buildings has a positive impact overall and it is noted that there were no differences in the likelihood of male or female HRPs living in higher blocks of flats.</p> <p>LFB's data shows that men are 16 per cent more likely to be victims of fire than women with men making up 58 per cent of fire victims over the last 20 years. Men and women are relatively evenly distributed across London.</p>	<p>English Housing Survey Households Report: Households with a male HRP (household reference person) were slightly more likely to live in a house, and less likely to live in a low rise flat in a block of three storeys or less than households with a female HRP, although there was no difference in the relative likelihood of living in other types of flats. Among households with a male HRP, 81% lived in a house and 13% lived in a flat in a block of three storeys or less, compared with 78% and 16% respectively of female HRPs. This was observed in the private sector but not in the social sector.</p>

		<p>In 2019, the GLA projects that 4.55 million Londoners are female and 4.55 million are male. Women face particular issues around gender-based violence and low pay. Young women report issues around financial pressures and mental health issues.</p> <p>Men face issues around lower educational attainment and are at higher risk of suicide.</p> <p>As most lone parents (90 per cent) are women, recent reforms to welfare that have affected lone parents have had a disproportionate impact on women. Women sharing other characteristics women often face additional challenges, such as higher gender pay gaps among older and BAME women.</p>	<p>In the social rented sector, households with a female HRP were notably more likely to live in a house (60%) and less likely to live in a block of flats of three storeys or less (27%), than households with a male HRP (49% and 38% respectively). For both tenures, there were no differences in the likelihood of male or female HRPs living in higher blocks of flats</p>
<p>Sexual Orientation (straight, bi, gay and lesbian people)</p>	<p>Neutral</p>	<p>PN800 and the amendments to include information and visits for high-rise buildings has a positive impact on the public in general and does not have a negative effect on an individual's sexual orientation.</p>	<p>Office for National Statistics: The proportion of the UK population aged 16 years and over identifying as heterosexual or straight decreased from 94.6% in 2018 to 93.7% in 2019. An estimated 2.7% of the UK population aged 16 years and over identified as lesbian, gay or bisexual (LGB) in 2019, an increase from 2.2% in 2018.</p> <p>Between 2018 and 2019, the number of men identifying as LGB increased from 2.5% to 2.9% and women identifying as LGB increased from 2.0% to 2.5%.</p> <p>Younger people (aged 16 to 24 years) were most likely to identify as LGB in 2019 (6.6% of all 16 to 24 year olds, an increase from 4.4% in 2018); older people (aged 65 years and over) also showed an increase in those identifying as LGB, from 0.7% to 1.0% of this age category.</p> <p>Between 2018 and 2019, the proportion of people who identified as LGB increased for England (2.7%, up from 2.3%) and Scotland (2.7%, up from 2.0%), however Wales (2.9%) and Northern Ireland (1.3%) remained stable; among English regions, people in London were most likely to identify as LGB (3.8%, an increase from 2.8%).</p>

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.

The amendments which include information gathering regarding high rise buildings has a wider positive impact on deprived areas and explained in the English Housing Survey Households Report: Households in the 20% most deprived areas of England, were more likely to live in flats (of any kind), than households living in all other areas, bar those households in the 2nd quintile of most deprived areas, who were equally likely to live in high rise flats. The physiological demands of high-rise operations conducted by Professor Bilzon and Dr Stevenson concluded the main findings of the study were that, regardless of the breathing apparatus worn, performing a 120-m vertical ascent and descent of a high-rise building in a full firefighting ensemble and carrying an item of firefighting equipment during the ascent is incredibly demanding and resulted in maximal or near maximal cardiovascular strain for sustained periods. As such the more relevant information contained with the Brigade system particularly for very high buildings (30 floors +), including tactics, that crews can access will assist in resolving an incident more effectively than without.

The Grenfell Tower Inquiry Phase 1 report overview highlights the section 7 (2) d and makes recommendations which are associated with PN800, the collection of risk information and training. LFB responded to an average of 2,637 fires in purpose-built flats a year over the past five years or roughly seven a day. This resulted in an average of 378 fire injuries a year at a rate of one injury every seven incidents attended or with an average of one fatality for every 300 incidents attended. The most likely location in a purpose built flat for a fire to start which results in a fatality is the living room or bedroom. There are over 8000 high-rise buildings in London with over 500 buildings of over 20 floors planned. In June 2021 there were 901 buildings in London with a temporary suspension of 'stay put' where an interim simultaneous evacuation strategy has been put in place which have an increased risk of fire spread outside the flat of origin to other properties within the same building.

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

How does this work help LFB to:

Eliminate discrimination?

Section 7 of the Fire and Rescue Services Act 2004 requires fire and rescue authorities to make provision for the purposes of (a) extinguishing fires in its area and (b) protecting life and property in the event of fires in its area. Section 7(2)d requires that in making provision to extinguish fires and protect life and property, the fire and rescue authority must make arrangements for obtaining information needed for those purposes.

Therefore, it is the policy of the London Fire Brigade not to discriminate and to ensure efficient arrangements are in place for the gathering, storage and dissemination of operational information on a risk-based approach that will assist in the successful resolution of an incident.

Certain groups are more likely to live-in high-rise flats than others, e.g. renters more so than owners, younger people more so than older people, black, Asian and minority ethnic households more so than white households, and those who live in the most deprived areas.

- 1% of owner occupiers lived in a high rise flat, compared with 3% of private renters and 4% of social renters.
- 5% of those aged 16 to 24 and 4% of those aged 25 to 34 lived in a high rise flat compared with 1% each of those aged 65 to 74 and 75+.
- In general, households with a black, Asian or minority ethnic household reference person (HRP1) were more likely to live in a high rise flat, e.g. 3% of households with an Asian HRP and 7% with a black HRP lived in a high rise flat compared with 1% of households with a white HRP.

Operational Risk includes the risk to the safety of fire fighters within the built environment and for the people who live and work in these buildings. Gathering and using operational risk information has developed over time with different LFB departments using their own systems and procedures.

PN800 collects information on risk accumulatively, as a result for example a Highrise residential building that not pose a risk then has multiple fires, then has residents that hoard, fire safety issues etc will accumulatively increase the risk scoring, attract information to be placed on our risk database and will attract a more frequent Bridge visit.

The LFB have procedures in place to gather a wide range and a large amount of operational risk information data and this is collated through a number of LFB IT systems which have proven to be resilient and a good facility to collate this information.

Regulatory Fire Safety (RFS) gather risk information under Regulatory Reform (Fire Safety) Order and operational crews gather risk information under the Fire Services Act. There are opportunities to improve the sharing of relevant risk information between LFB departments.

Operational risk information is currently collated using a paper-based system. With the introduction of the Appliance Workload App (delivered as part of the Mobile Data Terminal (MDT) replacement project) there is now the opportunity to provide a smarter way of inputting and sharing risk information. In addition the way we assess risk within a premise has not been updated in some time to take into account emerging trends or lessons from RFS or operational incidents.

	<p>Building Risk Review (BRR) In late 2019, the NFCC Protection Board launched the Building Risk Review (BRR) Programme to understand and help reduce the fire risk in high-rise residential buildings. The programme, supported by Government funding, aims to meet the ambition set out by the Secretary of State for Housing, Communities and Local Government in September 2019 to, 'significantly increase the pace of inspection activity across high rise residential and other high-risk buildings to ensure all have been inspected or reviewed by the end of 2021.'</p> <p>In March 2020, the Fire Protection Board's first Building Risk Review (BRR) exercise (Phase one) focusing on ACM buildings was successfully completed by Fire and Rescue Services (FRSs). Phase two of the BRR started to roll out in April 2020, with the aim of ensuring all high rise residential and other high-risk buildings are inspected (8005 buildings) or reviewed by 31 December 2021. In order to meet the Secretary of State's commitment and the December 2021 deadline, the Fire Protection Board have agreed that FRSs will be able to use a combination of initial risk assessments (such as the Operational Risk Inspections, fire safety inspections and desktop audits) to provide information on a minimum data set agreed by the Board. This data set will then be shared with Government partners to inform other work across the Building Safety Programme, including the prioritisation of buildings in scope for safety cases under the new Building Safety Regulator.</p>
<p>Advance equality of opportunity between different groups?</p>	<p>PN800 is primarily focused on station-based staff but is also supported by Fire Safety, building owners (public), specialist teams and departments. All personnel should be treated fairly and given equal opportunity to access facilities, support and opportunities regardless of any of the protected characteristics as defined under the Equality act 2010.</p> <p>Staff that engage with the collection of operational risk information should engage with local communities and the public to better appreciate the risk – e.g. ethnic minority groups, disabled people, young people. People within a building will react differently in an emergency and the Brigade should identify and consider this when gathering information. The risk assessors will be better trained and knowledgeable by attending voluntary Inclusion team faith and cultural awareness workshops.</p>
<p>Foster good relations between different groups?</p>	<p>PN800 is primarily focused on Brigade staff to deliver. All personnel involved in the information gathering process are encouraged to work with other departments, both internal and external, to support the needs of both internal staff and the wider communities we serve. The risk in London is</p>

	<p>ever evolving along with its population. The brigade has to build relationships with the community in order to effectively receive risk information, this is done on a local level and should be escalated to the borough management team to discuss alternative ways to engage with the community if this occurs, resolved at borough forums, local support meetings etc.</p>
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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

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.

Document Control

Signed (lead for EIA / action plan)	Richard Field	Date	11/01/22
Sign off by Inclusion Team	Shilla Patel	Date	11/01/22
Stored by			
Links			
External publication	Are you happy for this EIA to be published externally?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> If No state why: