



LONDON FIRE BRIGADE

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?
Respiratory Protective Equipment (RPE) Replacement Project

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

High		Medium		Low	✓
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2. Contact details	
Name of EIA author	Patrick Tawney
Department and Team	Operational Policy & Assurance and RPE Replacement Project Team
Date of EIA	23 August 2021

3. Aim and Purpose	
What is the aim and purpose of the policy, project, decision or activity?	<p>The Project is to replace the existing Respiratory Protective Equipment with new and enhanced capabilities.</p> <p>This project aims to:</p> <ul style="list-style-type: none"> • Ensure the London Fire Brigade (LFB) benefits from any technological upgrades on the market resulting in superior Respiratory Protective Equipment (RPE) in 2021 • Continue to provide and improve the facility for data exchange between the wearer and the entry control operative currently provided by telemetry as well as comprehensive data for management use in relation to training and safety event investigation • Deliver a respirator and Chemical, Biological, Radiological and Nuclear (CBRN) capability for every pumping fire appliance riding position and introduce a more complete RPE capability that carries a lower physiological burden than our current solution (lighter and more ergonomically designed equipment) • Produce specifications for RPE that meet the needs of the LFB in undertaking its duties whilst encompassing health and safety and compatibility with all personal protective clothing (PPE) clothing requirements

	<ul style="list-style-type: none"> • Provide improved communications to Entry Control and between Breathing Apparatus (BA) wearers • Review current BA ancillary equipment with specific focus on upgrading BA personal lines • Review current emergency air supply equipment for use in the event of a firefighter emergency • Take into consideration any recommendations from the Grenfell Inquiry, or any subsequent strategies to prevent fire deaths, in support of improvements to RPE in the future.
Who is affected by this work (all staff, specific department, wider communities?)	Staff and wider communities

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?	<ul style="list-style-type: none"> • Staff consultation, by way of presentations given by the Project Manager, at Borough training days • Feedback from end users are regularly sought • Diverse group of volunteers used to take part in evaluation trials • Trade Union face-to-face meetings • Further consultations with our Equality Support Groups (ESGs), the new Parents and Carers network, Learning Support Team and the Inclusion Team will be arranged accordingly.
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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 particular age group)	Neutral	<p>The Breathing Apparatus (BA) set will be used by all operational staff of any age.</p> <p>Women of menopausal age may experience elevated temperatures at times but it will be their responsibility to inform their line manager if reasonable adjustments need to be made. Facemasks, inner masks and head harnesses come in a variety of sizes and, by selecting the correct combination of the three, our new provider is confident that the masks will fit everyone and this selection will be carried out by a qualified face-fit technician.</p> <p>People of any age can catch Covid-19 but long Covid is understood to most commonly affect middle-aged and older adults. The Health and Safety Executive (HSE) has produced online guidance on how to fit test face masks to avoid transmission during the coronavirus pandemic and what additional measures operational staff should take to minimise the risk of transmission when being face-</p>	<p>Total workforce composition of operational staff from firefighter to station officer is 4,479.</p> <p>Women make up 8.82% of the total operational staff workforce composition (equal to 395).</p> <p>Total number of operational staff aged 50-64 across these ranks equates to 788.</p>

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Protected Characteristic	Impact: positive, neutral or adverse	Reason for the impact	What information have you used to come to this conclusion?
		fit tested for, and when, using respiratory protective equipment.	
Disability (physical, sensory, mental health, learning disability, long term illness, hidden)	Neutral	<p>There will be a nil effect on those with a disability. In order to wear BA, our staff have to be passed as fit to the required standard by HML.</p> <p>The brigade has a reasonable adjustment passport for staff members with learning disabilities which informs managers of any adjustment necessary for the individual. However, a good example of a reasonable adjustment being made is the current work being carried out on the use of hearing aids for BA wearers.</p>	<p>273 operational staff are registered disabled, 46 have not provided the relevant information but there are 4 people who would prefer not to say.</p> <p>The cohort of disabled operational staff equates to 6.10% of the total workforce but it must be stated that 1.12% have not provided any information in terms of their disability or otherwise.</p>
Gender reassignment (someone proposing to/undergoing/ undergone a transition from one gender to another)	Neutral	<p>This project will ensure that language is inclusive when communicating about project implementation and avoiding unnecessarily gendered terms to ensure staff identifying outside of a binary gender are not excluded.</p> <p>Our training provider has a statutory duty to apply the same rules and we will not accept anything that steps outside this.</p>	Data not currently recorded by LFB.
Marriage / Civil Partnership (married as well as same-sex couples)	Neutral	It is unlikely there will be any adverse impact on married as well as same-sex couples.	Data not recorded by LFB.

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		<p>The Project will ensure that language is inclusive when communicating about the implementation of the project and avoid unnecessary terms to ensure staff are not identified around their relationship or partnership status.</p> <p>Consideration of family life when implementing training programmes will be made.</p>	
Pregnancy and Maternity	Neutral	<p>In line with Policy Note 555b "<i>Maternity, Maternity Support and Adoption Provisions, including maternity and adoption support leave and shared paternity leave – uniformed staff</i>" and Home Office recommendations, pregnant uniformed operational staff should be removed from operational firefighting duties and only return when they have regained physical fitness or have ceased breastfeeding.</p> <p>Operational employees who are in the early stages of pregnancy must inform their line managers and trainees must also notify their senior trainer and development and planning officer (course leader) as soon as they know they are pregnant. The law does not bar pregnant operational staff from wearing breathing apparatus. The brigade is in the process of developing a reasonable adjustment passport, akin to the current passport for staff</p>	No data available. Referred to the Brigade's policy.

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Protected Characteristic	Impact: positive, neutral or adverse	Reason for the impact	What information have you used to come to this conclusion?
		members with learning disabilities, which will inform managers of any adjustment necessary for the individual.	
Race (including nationality, colour, national and/or ethnic origins)	Neutral	We will ensure that the language is inclusive when communicating about the implementation of the project and avoid unnecessary racial terms to ensure staff are not identified by their nationality, colour or ethnic origins.	The ethnicity breakdown of operational staff from firefighter to station officer is as follows: White: 3,762 (83.99%) BAME: 641 (14.31%) No information provided: 67 (1.50%) Prefer not to say: 9 (0.20%)
Religion or Belief (people of any religion, or no religion, or people who follow a particular belief (not political))	Neutral	This project will be applied equally to all employees regardless of their religion or belief and we do not anticipate any impact on staff of any religion, of no religion or those who follow particular beliefs. We will ensure the language is inclusive when communicating about the implementation of the project and avoid unnecessary religious terms to ensure staff are not identified by religion or belief. It is recommended that head coverings, such as hijabs, patkas, and kippahs/yarmulkes should be made of natural fibres. Hijabs have been tested with the breathing apparatus and suitable hijabs to wear under BA Firehoods can be	Bearing that this project is to replace existing BA sets which are currently in use, the religious make up of operational staff from firefighter to station officer (whose needs have been considered) is as follows: Muslim: 70 (1.56%) Hindu: 15 (0.33%) Sikh: 14 (0.31%) Jewish: 13 (0.29%)

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		<p>ordered on POMS if necessary. A separate EIA for hijabs has been written in consultation with the Inclusion Team.</p> <p>Due to the facemask head harness, turbans worn by Sikhs are not permitted in accordance with Section 6 of the Deregulation Act 2015 (which came into force on 1 April 2015) and which amends Sections 11 and 12 of the Employment Act 1989. Devout male Sikh operational staff can alternatively wear their hair in a top knot. However, it should be pointed out that the main issue of wearing BA sets does not pertain to hair length nor the wearing of a helmet, but the effectiveness of the face mask seal.</p> <p>With regard to facial hair due to religious beliefs, firefighters have to be clean shaven to comply with RPE legislation. We have investigated alternatives but as long as the manufacturers' advice is that wearers need to be clean shaven in such a way that facial hair does not affect the face seal, we must comply with their instructions as an approved code of practice. Allowing facial hair is considered as an intolerable risk and the HSE confirms our position as correct (refer also PN320, PN476, PN956)</p>	

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Protected Characteristic	Impact: positive, neutral or adverse	Reason for the impact	What information have you used to come to this conclusion?
Sex (men and women)	Positive	<p>In 2016, LFB commissioned research by '<i>Future Thinking into the barriers facing women when considering a career as a firefighter</i>'. Relevant findings included perceptions that the work was "dangerous", "too physical" and "too risky" and that women firefighters were viewed as needing "exceptional upper body and general strength" and were "not physically strong enough".</p> <p>The benefits of making the RPE equipment lighter and more ergonomic will encourage more women to join as firefighters.</p>	<p>Total workforce composition of operational staff from firefighter to station officer is 4,479.</p> <p>Women make up 8.82% of the total operational staff workforce composition (equal to 395) compared to men who make up 91.18% (equal to 4,084) between the ranks of firefighter to station officer</p>
Sexual Orientation (straight, bi, gay and lesbian people)	Neutral	<p>We will consult with our ESGs to ensure that language is inclusive when communicating about the implementation of the project.</p>	<p>Intended end users of the replacement BA sets are across the ranks of firefighter to station officer. The sexual orientation of this operational workforce comprises as follows:</p> <p>Heterosexual staff: 68.05% (3,048) Those who prefer not to say: 26.39% (1,182) LGBTQ+ staff: 5.52% (249)</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.

Having consulted with Health and Safety (H&S) in relation to colour blindness, the response received was that "[it is not felt] that colour vision is a safety critical requirement" as there are other mitigating designs that the suppliers provide so colour blindness is not an issue.

In accordance with PN320 "Wearing of uniform and personal appearance" (section 8.7), cosmetic and prescribed facial make-up is prohibited as it degrades the rubber and may affect the quality of the seal if it comes into direct contact with the facemask seal and could pose a health and safety risk.

Although the LFB have relaxed rules on facial and body piercings, PN320 (section 8.8-8.12) "Wearing jewellery and adornment at work" also sets out exactly what the LFB considers acceptable and follows the professional advice and guidance provided by H&S, Occupational Health Services, General Counsel and People Services. Any item of jewellery/adornment must be removed if it comes into contact with the face mask seal as it has the potential to impair the efficiency of the seal and compromise the respiratory protection of the wearer.

Consider: how accessible is your policy/project/proposal for people with learning disabilities or neurodiverse conditions? Have you checked the colours, or used flowchart and diagrams?

RPE Replacement Project updates are published on Hotwire under 'All News'. Policy Notes will include clear images, diagrams and checklists for the various parts of the equipment and how to use them. All equipment and literature associated with the Project for the end user has been tested by a diverse group of volunteers in terms of the size and readability of the text on electronic screens and the intuitive nature of the icons used in order to cater for the widest possible neuro-diversities. This process will continue throughout the lifespan of the project and we will continue to work with the manufacturer to develop the simplest systems and will also liaise with the Brigade's Learning Support Team to ensure suitability and compliance. It should be noted that this will have the knock-on effect of needing simpler training.

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

How does this work help LFB to:	
Eliminate discrimination?	The BA set is an essential piece of equipment and is standardised for all operational staff. The back plate is adjustable to fit all heights and size.
Advance equality of opportunity between different groups?	It is anticipated that the replacement BA set will meet the needs of all operational staff who use the equipment irrespective of their protected characteristics or differences because the Project intends to make reasonable adjustments to ensure that everyone can safely use the equipment in a similar way.
Foster good relations between different groups?	By working in a similar way using the same equipment with reasonable adjustments, discrimination and marginalisation issues are eliminated and differences are less obvious which fosters good camaraderie and promotes a wholesome team spirit between the different characteristics.

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.

Signed (lead for EIA / action plan)	GC Patrick Tawney, RPE Project Manager	Date	23/08/2021
Sign off by Inclusion Team	Shilla Patel	Date	23/08/2021
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: