

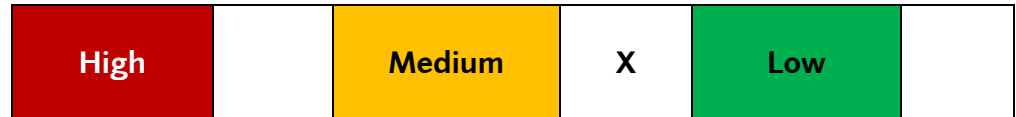
Equality Impact Assessment (EIA) Form

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?
Procurement of nine new command units and an Incident Command Operating System within PRJ 35 the Command Unit Replacement Project

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	Andrew Paffett
Department and Team	Incident Communications, Operational Policy and Assurance
Date of EIA	09 September 2021

3. Aim and Purpose	
What is the aim and purpose of the policy, project, decision, or activity?	<p>The procurement and replacement of eight operational and one reserve command units that are reaching the end of their operational life.</p> <p>The procurement of a replacement incident command operating system that is utilised on all operational command units.</p> <p>To give the incident commander, and those remotely monitoring an incident, a better situational awareness of the incident through the collation of data and streaming of imagery within a software solution.</p>
Who is affected by this work (all staff, specific department, wider communities?)	All command unit qualified personnel, certain members of the LFB ICT department, Babcock trainers, also rolled out at a later point to senior officers and control staff within the LFB

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>Discussions have taken place with equality support groups, Neurodiversity and Dyslexia, Wellbeing Team, and Disability Working Group. Discussions are ongoing with trade unions as this an integral part of the command unit replacement project.</p> <p>Consultation over a six-month period at the start of the project with and including all command unit personnel at the time, all senior officers from station commander upwards and sent out to all members of the operational sounding board.</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 age group)	Adverse	<p>The new incident command operating system is a cloud-based solution that can be utilised on portable IT solutions at an incident. This will also allow for remote monitoring of an incident and continuation training at stations within an office environment. The command units will have a hybrid solution installed on the computers, allowing the operators to access ICOS</p> <p>Due to the nature of the current command units being built on an LGV chassis, this type of vehicle requires several internal steps for personnel to access and exit the vehicle. Over long periods of time at incidents, this can become demanding on the personnel that are required to enter this vehicle. The ridership position at the rear of the</p>	<p>At present, command units utilise the command support system via a fixed IT solution on the command unit, this is also utilised by FRS personnel in a support mode via desktop computers. This software will not be utilised by members of public. The portable solutions will possibly require the use of carrying straps to assist personnel utilise these devices on the incident ground.</p> <p>Through previous command unit design, usage and through consultation at the beginning of the project a conscious decision was made to utilise a vehicle with a low floor</p>

		<p>vehicle is isolated away from the rest of the personnel in the chassis day cab. The seating position is also does not lend itself for all personnel to be able to correctly place their feet on the floor whilst seated.</p>	<p>space to allow for easy entry and egress to the vehicle. The seating being utilised for travelling and whilst seated at the operator positions has height and rake adjustment, padded adjustable arm rests, back seat tilt adjustment They also rotate through 180 degrees to allow for easy access and egress. The 3rd and 4th rider positions have now been moved to the front of the vehicle to be near the appliance commander and driver to afford more comfort to the crew.</p>
<p>Disability (physical, sensory, mental health, learning disability, long term illness, hidden)</p>	<p>Adverse</p>	<p>There may be some affect for those with learning difficulties utilising the new incident command operating system (ICOS) through the background colour scheme. The software may in places have a list formation. The use of keyboards and mice within the command unit and the monitors that are installed at the operator positions.</p> <p>Due to the nature of the current command units being built on an LGV chassis, this type of vehicle requires several internal steps for personnel to access and exit the vehicle. Over long periods of time at incidents, this can become demanding on the personnel required to enter this vehicle. The ridership position at the rear of the vehicle is isolated away from the rest of the personnel in the chassis day cab. The seating position is also does not lend itself for all personnel to be able to correctly place their feet on the floor whilst seated.</p> <p>Lighting within the vehicle may also have an affect whilst using computer equipment within the command unit through the reflection on the monitors.</p>	<p>Soft market testing and user requirements that have been stipulated through the project board. Initial consultation with various members of the Brigade at the beginning and throughout the project. ICOS has the ability of speech to text for decision making and the preferred bidder is working to enhance this capability throughout the ICOS application.</p> <p>Through previous command unit design and through consultation at the beginning of the project a conscious decision was made to utilise a vehicle with a low floor height. The replacement command units will be based on a single deck bus chassis with a low floor space reducing the height of the first step for entry into the vehicle compared with the existing command units.</p> <p>The existing command units had minimal external lighting and was reliant on the artificial lighting within the vehicle. The new command unit will have enhanced lighting</p>

			<p>externally to illuminate up to 5 metres around the sides and back of the vehicle. The use of as much natural lighting through the design of the vehicle being based on a bus chassis will reduce the requirements to utilise artificial light during the day, with the ability to individually shutdown the lighting during the night time to reduce the glare on the monitors.</p> <p>The reduction of the floor height and removal of the steps within the new command unit over the previous vehicle, will allow for easier access and egress into the vehicle. The access will still be inaccessible for wheelchair users due to the location of the command units within the incident ground and the obstacles that may have to be navigated to reach the CU (fire hose, fallen debris).</p>
<p>Gender reassignment (someone proposing to/undergoing/ undergone a transition from one gender to another)</p>	<p>neutral</p>	<p>The use of the incident command operating system within the command unit and whilst on the incident ground does not discriminate an individual's gender.</p>	<p>This software is gender neutral initially utilising data inputted from various locations within the Brigade. I.E. Vision, StARS for roll call board information, ORD, and hydrant data. This information can be currently found on the Airwave MDT terminals located in the front of all pumping appliances. Any data inputted or streamed at an incident will be incident specific.</p> <p>The use, implementation and training on the new incident command software and command units will be applied through agreed training and familiarisation via the</p>

			ICOS suppliers and Babcock training limited in line with the Brigades training policies.
Marriage / Civil Partnership (married as well as same-sex couples)	neutral	The use of the incident command operating system within the command unit and whilst on the incident ground does not discriminate an individual's marital status	The use of the ICOS does not have an effect, nor does it require or identify an individual's marital status. The use, implementation and training on the new incident command software and command units will be applied through agreed training and familiarisation via the ICOS suppliers and Babcock training limited in line with the Brigades training policies.
Pregnancy and Maternity	Neutral	An individual who is pregnant would be precluded from riding this vehicle. in line with the requirement for operational staff contained within Policy Note 555, but the software we be able to be trained on and utilised within an office environment.	In line with the requirement for operational staff contained within Policy Note 555, but ICOS would still be able to be trained on and utilised within an office environment away from the command unit.
Race (including nationality, colour, national and/or ethnic origins)	Adverse	Across the eight new command unit locations, there is a vast variation of ethnic diversity who may be affected by one or more requirements within the command unit. These may include the operator and crew seating, lighting, and ceiling height within the vehicle	The project team have aimed to maximise the available space within the chosen vehicle but are limited to the available room to access and exit the brigade's appliances bays and by the roads and streets in and around London. The project team will through the design phase ensure that the available space remains useable and that the ceiling height within the vehicle is not reduced. These points as well as those mentioned within the disability and age sections will be inputted within this design stage.
Religion or Belief (people of any religion, or no religion, or people who follow a particular belief (not political))	Neutral	There is a requirement to wear PPE when using the command unit and when traversing the incident ground.	This is covered by policy number 320 wearing of uniform and personal appearance.

Sex (men and women)	Neutral	The command units can attend incidents for an extended duration on time, which can have an affect on the ability for personnel to attend their personal needs.	This is covered for all personnel within policy number 733 Portable Hygiene Units
Sexual Orientation (straight, bi, gay, and lesbian people)	Adverse	The use of the incident command operating system within the command unit and whilst on the incident ground does not require any individual to disclose any personal information. If at a Fire survival guidance incident, information may be collated at an incident or passed from control via the Brigade mobilising system or via telephone that will contain information including name, age, sex of an individual within an incident scenario.	Any information that is passed and stored within ICOS is available to any ICOS user attached to the incident, but personal data will be limited to name, age, sex of an individual. No other personal information on that individual is required to be held within the system. For Brigade personnel, the only information within ICOS will be that which is contained on the appliance nominal roll boards (name and rank, also operational qualifications MD, EDDBA.) and populated via StARS into the ICOS system as is contained within the current command support system. Any requests for information contained within ICOS from any individual once the incident is closed will be through the information access team.

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.
<i>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?</i>

Within ICOS, there is the ability to record decisions using voice to text speech, the preferred bidder is working to evolve this facility throughout ICOS. With the procurement of the deployable tablets, conscious efforts will be made to work with ICT procurement to ensure that they have read/write gold on them. For individuals on the command units that require to use of specialist equipment like mice, keyboards and monitor screens, we will work with ICT to look at how these will be integrated onto the CU or whether they need to be personal issue to the individuals.
Any policies or user manuals for these vehicles will contain pictorial information to assist with learning as well as practical inputs.

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

How does this work help LFB to:

Eliminate discrimination?	The project team is liaising with various groups within the LFB to understand what discrimination may occur within this project and the replacement of the incident command operating system. This will be ongoing, and we will seek information for these personnel on how to alleviate/eliminate any discrimination. These groups include, the consultation group for health and safety including the representative bodies, the Wellbeing group, neurodiversity and dyslexia groups, and the disability working group.
Advance equality of opportunity between different groups?	Within the London Fire Brigade, there has been a change on the ranks that are now able to ride and crew the command unit due to the integration of staffing model as per the London Safety plan 2017. This has opened the command unit to a larger demographic within the Brigade from fire fighter to station officer and possibly control staff once the CU is located at the London operations centre, Merton.
Foster good relations between different groups?	The project team is liaising and consulting with various groups including health and safety and the representative bodies, the wellbeing group, neurodiversity and dyslexia groups and the disability working group, as well as the operational personnel who will be riding these vehicles. We will consult their findings and work with them to reach agreements around this project.

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
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A cloud-based incident command operating system utilised on fixed and portable IT systems.	Utilise read/write gold tablets, use of screen overlays for individuals with sensory disabilities. The use of alternative keyboards and mice for individuals with physical disabilities	Abdel Guermellou/Andrew Paffett
Easy access/egress from the new command unit, removal of unnecessary step access	The use of a low platformed vehicle (single deck bus chassis) over that of an LGV chassis vehicle, removing the need to have a step access.	Trevor Neal/ Abdel Guermellou/Andrew Paffett
The use of natural lighting over the constant need for artificial lighting	The use of a single deck bus will allow for more natural lighting within the vehicle, the ability to turn off lights individually or dim them if needed to reduce the glare on the monitors.	Trevor Neal/ Abdel Guermellou/Andrew Paffett
Ridership within the new command units to be different from the current command units	The use of seating at the front on the vehicle as close to the driver as possible will reduce the isolation that is practiced within the current command unit. The new command unit will also have better forward and side vision for personnel due to the design of the vehicle.	Trevor Neal/ Abdel Guermellou/Andrew Paffett

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.