

OFFICIAL 26 May 2022 2022 CRMP

**Equality Impact Assessment** 

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### **Purpose**

- 1. The analysis of the impact of any policy, provision, or service, or change thereto, must be in compliance with s.149 of the Equality Act 2010, known as the Public Sector Equality Duty (PSED). The PSED sets out that a public authority, in the exercise of its functions, must also have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between persons who share a relevant protected characteristic and those who do not share it.
- 2. The following characteristics are protected characteristics:
  - age
  - disability
  - gender identity and reassignment
  - marriage and civil partnership
  - pregnancy and maternity
  - race
  - religion or belief
  - sex
  - sexual orientation
- 3. It is implicit in having 'due regard' that we consider any impact on people who share relevant protected characteristics. This may in some cases require evidence gathering, engagement or consultation with those affected by the proposed policy or change. The ultimate purpose of any analysis is to provide those making the decision with the information to make an informed decision, so that where possible potential differential impact is eliminated, and where it is not possible, that it is mitigated against.
- 4. The concept of due regard requires that there has been a proper and conscientious focus on what the duty requires. The decision cannot then be interfered with judicially simply because a judge would have given greater weight to the equality implications of the decision than did the decision maker. The decision maker must be clear what the equality implications are when they put them into the balance with other considerations, and they must recognise the desirability of achieving them, but ultimately it is for the decision maker to decide what weight they should be given considering all relevant factors.
- 5. The Equality and Human Rights Commission has also provided guidance stating that organisations subject to the PSED must ensure that the impact financial proposals could have on the performance of the general equality duty is properly considered as part of the decision-making process.
- 6. This equality analysis considers the anticipated impact on people who share protected characteristics of the draft Community Risk Management Plan, dated 27 May 2022. It will then be subject to public consultation after which the equality analysis will be re-assessed for the final report before publication.
- 7. The London Fire Commissioner (LFC) must produce a Community Risk Management Plan (CRMP) this time in London it is called *Your London Fire Brigade* in accordance with the government's Fire and Rescue Service National Framework 2018. The Fire and Rescue Services Act 2004 (FRSA)

requires the Secretary of State to publish a national framework for the fire and rescue service, and to review and update that framework regularly. The national framework sets out the government's expectation for the service and the LFC must 'have regard' to its contents when planning and delivering its services.

8. This equality analysis has been prepared by the Head of Strategic Planning. This document considers which proposed actions have the potential to have some equality impact, and how equality analysis may be undertaken for those actions.

### **Anticipated Impact**

- 9. The Community Risk Management Plan four new pillars and eight commitments, which will transform the way the Brigade delivers its services over the life of the Plan.
- 10. **Commitment 1. Community focussed**. Our first commitment will make sure that all communities in London will have a voice and we will act as a voice for fire and rescue related risks for those communities that find it hard to be heard. This will mean that we will work towards providing equity of service across London's diverse communities, so that service can be tailored at a local level to meet the needs of local communities who share protected characteristics especially ethnically diverse communities.
- 11. **Commitment 2. Service-led.** Our communities will feel this commitment in the way they access our services. Our services will be made accessible for all. This may mean that we increase the number of services which are available online, however in doing this we want to free up capacity to ensure that those who are most vulnerable from fire and other risks access our services in a way that suits them. This will mean that those communities who share certain protected characteristics such as people with disabilities or older people will have services tailored to their needs.
- 12. **Commitment 3. Adapting to change.** We will adapt our services as London's needs change and risks evolve. This will mean continuing to adopt the most modern fire and rescue service technology, training, and tactics. We will update our understanding of risk in London annual and review our plan if there are any significant changes to London's risk profile. As such if there is a change in socio economic landscape which includes changes in protected characteristics then we will be able to adapt our services to ensure that these changes are considered in how we respond to changing risks.
- 13. **Commitment 4. Driven by outcomes.** Our will enhance our services both before and after we are called to an incident to ensure that everyone receives the help, they need to mitigate risk and reduce future harm. This means that those who are most vulnerable in our society to fire and other emergencies, such as older people or people with disabilities receive the care that they need to keep them safe and help make them feel safe in their homes, at work or in public places.
- 14. **Commitment 5. Best People.** We know that it is important to Londoners that LFB reflects the communities they serve. As part of this plan, we will work to ensure that our staff are reflective of their local communities and that we represent London. We will introduce measures of how ethnically diverse our workforce is and set targets for them to represent their communities. We will take positive action to recruit and promote underrepresented groups across all protected characteristics.

- 15. **Commitment 6. Working Together.** We will work together as one team to deliver this plan and its projects. We will ensure that each project contains a detailed EIA to identify the impacts of each change on the communities we serve and to ensure that everyone has a voice. We know we need to learn from you as much as you need us to deliver the best services we can. We will continue to learn from you throughout the life of this plan to ensure that we build a safer London together.
- 16. **Commitment 7. Delivering value.** We know that the money we receive comes from the taxes that Londoners and London's businesses pay. We want to deliver the most valuable service we can and ensure that every penny we have is put towards making Londoners safer. This is important for all Londoners and especially those with particular protected characteristics who may not have access to the financial support needed to make themselves safer and therefore more likely to need our direct support.
- 17. **Commitment 8. Safer Future.** By working for a safer future, we are committed to reducing our carbon footprint and making London's air cleaner for those who live in our communities. This commitment is especially important for those who have difficulty breathing or live in areas of high population density. We will work with all London's communities through our enhanced community engagement to ensure that we continue to represent the things that matter to them the most and set up wider groups to represent all protected characteristics.
- 18. As part of our commitments we will be exploring flexible resourcing models to increase productivity and free up staff to deliver more prevention and protection activity and undertake professional training. We also review our resource allocation in relation to risk on an annual basis and will continue to review the locations of some of our specialist appliances. Any review that considers the location and use of operational resources will be considered for its impact both on staff and on service users affected by any proposal.
- 19. We will look at the available space that we have on some of our station estate to explore what we can do to help tackle the housing challenges facing London. Consideration will need to be given to the affordability of any proposals for average Londoners.

### **Evidence**

#### What we know about our staff

22. The LFC holds data on staff regarding sex, race, disability, age, sexual orientation, and religion. Specific data is not collected on the remaining protected characteristics of gender reassignment, marital/civil partnership status and maternity. The data held is supplied both at recruitment and on employment, and staff are periodically reminded to review and update the information held on them according to the requirements of the Data Protection Act.

#### What we know about the people impacted by our services

- 23. We hold a wide range of data about the incidents (including fires that happen in London and the casualties that result. We also hold data about the services we provide the time it takes for appliances to respond to emergency incidents and the community safety work, like home fire safety visits, we carry out.
- 24. The following conclusions can be drawn from the data:

- Total incidents attended: There is a downward trend in the number of incidents LFB has attended, with a lower number in 2021/22 compared to five years earlier. We expect the number of incidents we attend will remain at this lower level over the life of the Plan, or that some types of incident may rise slightly in line with the rising population in different boroughs.
- **Total fires attended**: The number of fires attended by the LFB over the last five years has fallen. We expect the number of fires to remain at this lower level over the life of the Plan, or to increase only slightly in line with the rising population.
- **Fire casualties (deaths and serious injuries):** The LFB has not been able to identify any pattern to **the** numbers of fire deaths or injuries in different areas, and the fires that give rise to casualties are relatively random events. We do know that that older people, particularly men who are smokers, are more at risk of being a fire casualty. We will continue to develop our understanding of what increases people's vulnerability to fire and other emergencies and work to integrate the outcomes of the National Fire Chief's Council (NFCC) Definition of Risk project.
- Home fire safety visits (HFSVs) carried out: HFSVs are one of the main ways in which the
  Brigade seeks to prevent fires in home, and to reduce casualties, if a fire does break out. We
  intend to deliver more of these services online through our Home Fire Safety Visit Checker,
  allowing us to spend more time targeting the most vulnerable people in London, working
  with partners to deliver additional support when there are particular needs.

#### What we know about local risk

25. In June 2021, the LFC agreed a new approach to the Assessment of Risk (AoR). This new approach considers risk in London from a range of perspectives. At the centre of the risk assessment are concerns that people locally think impact on their safety, particularly in respect of fire which relate to people and the places they live. The AoR also combines likelihood and consequences of the actual incidents LFB attends and the casualties (fatal and non-fatal) that arise (based on historic data). Additionally extraordinary risks and future risks are considered so that we can ensure that we have a full picture of risk in London, now and in the future.

26. In September 2021, we engaged within internal and external stakeholders to refine this AoR through a public consultation. This has resulted in the inclusion of more 'concerns' identified by stakeholders, together with a fuller explanation of consequences.

27. A further academic and profession review was undertaken of the AoR by an independent panel to test its robustness and defensibility. This resulted in some minor changes to clarify meaning but no changes were made to the overall risk assessment.

#### People who share protected characteristics

28. Operational response services are not provided based on a person's protected characteristic; however, it is important that this data is presented to consider whether there is any indirect differential impact on people who share protected characteristics. The Brigade uses data obtained from the 2011 census however, it should be noted that the census did not collect information on all protected characteristics.

- 29. The 2011 census shows that London-wide, this will be updated with data from the 2021 census as soon as this is available:
  - 12 per cent of the population is **aged 65**;
  - 43 per cent of the population have an ethnically diverse background;
  - 14 per cent of the population have a disability;
  - 74 per cent of the population have a **faith**;
  - 3.2 per cent of the population are **estimated to be lesbian, gay, or bisexual** according to the integrated household survey 2013 release. This information was not collected in the 2011 census.
- 30. The Brigade targets its fire safety work on lifestyles or risk factors of individuals rather than groups of people who share protected characteristics. This is because information about incidents collected by the Brigade indicates that the behaviour and lifestyles of individuals remains one of the primary factors in the number of fires that LFB attends. Whilst it is true that certain lifestyles identified as being at higher risk will also contain people who share protected characteristics, belonging to a protected characteristic group in the first place does not necessarily place individuals at risk. However certain protected characteristics can mean that individuals from certain groups of protected characteristics may be more vulnerable from fires and other emergencies. An example would be older people or people with disability who may not be able to react and escape from a fire as easily as someone who did not share these protected characteristics. Similarly, people who come from ethnically diverse backgrounds, especially those who second language is English, may not be able to access certain services as easily as people who are born in London.
- 31. In determining the most vulnerable people in the community, the Brigade uses a suite of statistical analysis techniques to better understand where incidents occur and who is affected by them. Our developing Assessment of Risk is one of those tools. A further layer of information is added using Acorn lifestyle profile data to see which types of people are at greatest risk from accidental fires in the home. Acorn is a commercial product that describes households by different lifestyles. We use this information to arrive at priority postcodes so that we can target our preventative work in areas that are overrepresented in terms of their combined fire/casualty risk. This enables the Brigade to use its resources in the areas where they will have most impact. We are currently working with the NFCC's to integrate their national work on the Definition of Risk into our analysis to further enhance our targeting of the most vulnerable people in London.

### Consultation

- 32. In September 2021 we completed a consultation on our Four new pillars and eight commitments, along with the AoR. A covering report detailing the questionnaire responses as well as the consultation analysis was produced by Tonic in response to this consultation.
- 33. Additionally, we undertook a range of community engagement sessions and two YouGov surveys between January 2021 and March 2022 to understand communities needs, wants and expectations of LFB and our proposals.
- 34. We also undertook a range of face-to-face engagement with our staff at Fire Stations, in Area teams and in our Control centre.

- 35. The feedback gathered from these sessions was fed into the development of our Target Operating Model and the updating of our AoR.
- 36. Awe will now undertake an eight-week consultation process, running from Monday 30 May 202 to Monday 25 July 2022. The Consultation Plan includes a consultation questionnaire using the Talk London portal.
- 37. To ensure accessibility, people will be able to contact the Brigade to request hard copies. Where requests for translations of the document and in easy read format will also be taken. Consultation responses in the form of letters and emails will also be accepted.
- 38. Details on the proposals and how to respond will be sent directly to key stakeholders, including London MPs and MEPs, Assembly Members who are not members of LFEPA, central government officials and ministers, leaders of the political groups at London boroughs, chief executives of London boroughs, chief executives of other emergency services in London and neighbouring fire and rescue services, public bodies, equalities bodies and other stakeholder organisations.
- 39. At the borough level, Borough Commanders will hold local community consultation session in their boroughs and hold engagement session with key local partners to ensure they understand the proposals and are available to attend scrutiny meetings.
- 40. Staff will be kept informed of the consultation process and will be encouraged to take part using our usual internal communication channels, and discussion and engagement will be encouraged on Hotwire. Staff could also raise questions through their line management chain, via the consultation mailbox.
- 41. At the midpoint of the consultation period, officers will review the responses received (in terms of origin of responses, not content), to identify where particular groups may be underrepresented. Digital marketing will be used to encourage responses from those groups and direct contact will be made with organisations representing or already communicating with these groups, asking them to publicise the consultation to encourage people to respond.

### **Proposed actions**

- 46. **Staff we employ.** There are no firm proposals that would result in the loss of staff. The impact on any staff affected by any of the proposals regarding changes to working patterns, role or location will be analysed and any measures to mitigate that impact will be considered when the impact is known.
- 47. **The services we provide.** The LFC publishes a wide range of data about the services it provides. Raw data about incidents attended (since 2009), and the pumping appliances attending those incidents, is published on the London Datastore. Alongside this, the LFC publishes a wide range of data, at borough and ward level, to support its Statement of Assurance about the incidents we attend, attendance times for pumping and some special appliances, and the community and regulatory fire safety work carried out.

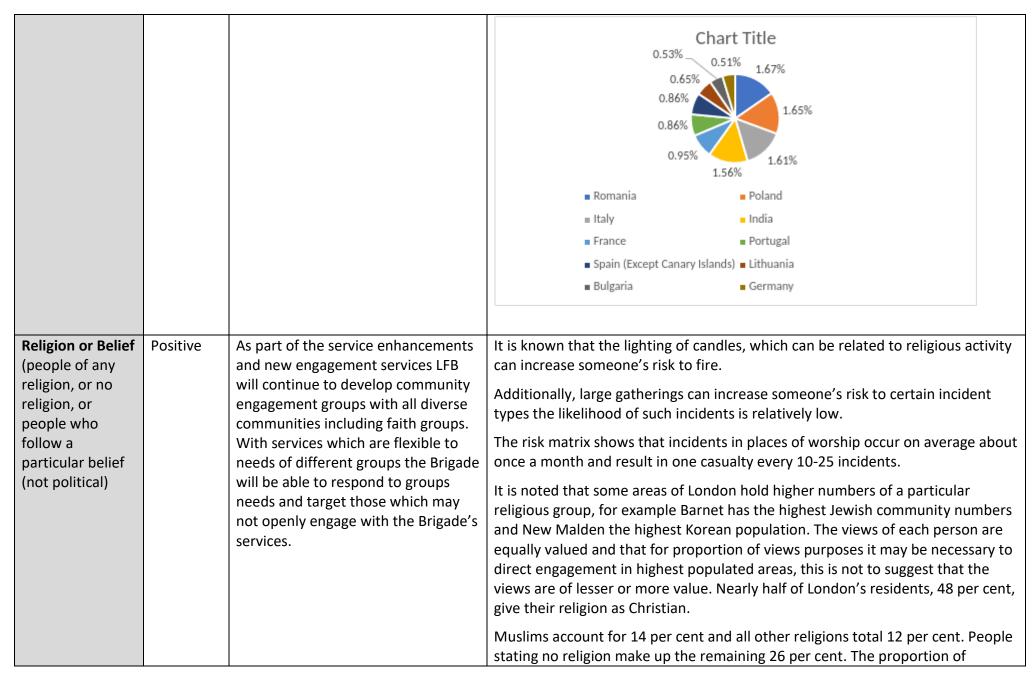
# Appendix 1. Equalities Impact Assessment

Protected Characteristic	Impact: positive, neutral, or adverse	Reason for the impact	What information have you used to come to this conclusion?
Example: Age	Adverse	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.	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.
Age (younger, older, or age group)	Positive	Though the use of online mediums will increase to broaden access to services, there will be no reduction in face-to-face services for those who are most vulnerable or have specific needs (e.g., at risk of digital exclusion). By making services more people centred and flexible to need, the Brigade will ensure that the most vulnerable in society and those who have specific needs can access services in a way that best suits them and release capacity to help support those who are at most risk of being a victim of fire or other risk.	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. Figure 7. in appendix 1. shows that those aged over 65 are evenly distributed across London. Table 1. confirms this with 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.  London's population, the number of Londoners aged 65 or over is projected to increase by 86 per cent between 2019 and 2050, faster than younger age groups. Therefore, there will be a growing need for infrastructure that supports an ageing population, including accessible.  London Data Store 2019:  12% of Londoners are 65+.  68% are 16-64 and  20% are 0-15.  45% of fires deaths are in the over 40 years bracket. (LFB FIRE FACTS Fire deaths in Greater London 2019).

strategy will aid the Brigade to k better with partners at a local pan-London level to help identify tailor services for specific needs. will mean a move from a one	LFB's data shows that disability and poor mental health and mobility issues and taking prescription drugs increase your vulnerability to fire. Figure 4. in appendix 1. shows that disability is distributed across London with a great proportion in
fits all service to tailored services ch a centred around individuals cific needs, that adapt as their ds change and are flexible to the erent needs of individuals in ety.	east London and the extreme west of London. 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 are economically deprived you are more likely to have a fire. There are several related reasons for this. Figure 3. shows that there are patches of deprivation across London with a bias towards the eastern side of London as well as some areas in Northwest London.
chancing the way, the Brigade vers its services so that they are ble to a persons need and cred on the person the Brigade be able to deliver a service that ilored to the individual. This will lone through more localised ice provision and greater use of the services to identify how an vidual wants to receive a service. It is neally nost service feedback	There is no detailed data held by the Brigade in relation to gender reassignment and their vulnerability to incidents which the fire and rescue service would be expected to attend and therefore no assessment has been made.  Research carried out in 2012 on the acceptability of gender identity questions in surveys provided an indicative estimate that 1 per cent of the UK population identify as trans.  LGBT in Britain – Home and Communities' Report shows that:  Half of Ethnically Diverse LGBT people (51 per cent) face discrimination within the LGBT community.  More than a third of trans people (36 per cent), one in eight LGBT disabled people whose activities are 'limited a lot' (13 per cent), and one in five LGBT
lon ice ne vid	e through more localised provision and greater use of services to identify how an

		future and what more individuals need to feel safe as well as be safe.	people of non-Christian faith (21 per cent) say they have experienced discrimination from within the community because of different parts of their identities.  Only half of lesbian, gay and bi people (46 per cent) and trans people (47 per cent) feel able to be open about their sexual orientation and/or gender identity to their whole family.  A third of bi people (32 per cent) say they cannot be open about their sexual orientation with anyone in their family.
Marriage / Civil Partnership (married as well as same-sex couples)	Positive	All LFB services will be enhanced as part of the CRMP and as such the impact on married couples or people in civil partnerships will be positive. The Brigade will also be able tailor and target its services to people who live alone to help them take steps to be safer in their homes, their work and in public spaces.	LFB's data shows that being in a marriage or civil partnership generally decreases your risk from fire. As such those people who live alone and especially older people who live alone often have more risk factors making them more vulnerable to fire.
Pregnancy and Maternity	Positive	Enhancements to the way the Brigade uses its data and shares information with partners will help the Brigade to continually update its understanding or risk. This will mean that though someone who is pregnant or in a period of maternity is not going to always be at risk it is important for the Brigade to be able to provide services which help those within this group to feel and be safer. By making our services people centred and flexible to need and changing needs the Brigade will be	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.  Some mobility risks are borne from the hormone, which relaxes ligaments.  Movement of organs to accommodate a growing baby can result in pressure on nerves and hips which in turn result in issues with mobility.  Additional risks presented in relation to the unborn child.  Removing the assumption that only heterosexual people will be categorised within this characteristic

		able to provide improved measures to support this group.	
Race (including nationality, colour, national and/or ethnic origins)	Positive	The Brigade knows that some races have lower trust levels for LFB than others and as such may be less likely to engage with its services. This can have an adverse impact on safety for these groups. As such by using this information and working across services to improve engagement with all of London's diverse communities the Brigade can improve service outcomes for this group. By putting people at the centre of its services it will mean that the Brigade can allow groups to access it services in a way that suits them. Therefore, if a particular group does not openly engage with uniformed services it can tailor its service at a local level to enable groups to access the services they need in a most appropriate way.	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.  The 2011 census show that 1 in 10 London residents had migrated to the UK within the previous 5 years.  78% of London's population is made up people from the United Kingdom. Therefore, up to 22% may not speak English as a second language if at all.  Top 10 represented nationalities (Other than UK non-English speaking) in order in London and main dispersion areas:  1. Romania – Northwest and Northeast  2. Poland – Northwest and Southeast  3. Italy – All, particularly Westminster, Kensington & Chelsea, Hammersmith & Fulham  4. India – West and Northwest, Hounslow. Northeast – Redbridge  5. France – All  6. Portugal – Outer London, Brent, and Lambeth  7. Spain – All  8. Lithuania – Outer, Greenwich  9. Bulgaria – Haringey and Newham  10. Germany – All



			Londoners who are Muslims or who have no religion has increased in recent years, while the proportion who are Christian has declined.
Sex (men and women)	Positive	The quality of all services will be enhanced through the combined projects which will be delivered through the CRMP and as such all Londoners will benefit from service enhancements. The LFB will continue to embed its togetherness strategy and ensure that any form of bias is not tolerated within the organisation.	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.  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. 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. Young women report issues around financial pressures and mental health issues.  Men face issues around lower educational attainment and are at higher risk of suicide and therefore may be more at risk to fire and other emergencies. Additionally, there is evidence that if men become single in later life, they may find it harder to care for themselves and more likely to undertake riskier behaviours.
Sexual Orientation (straight, bi, gay, and lesbian people)	Positive	Services will be flexible to the needs of all communities and local areas will be empowered to target their services at those who are most vulnerable within their communities. This will mean that areas where there is a high LGBYQ+ community will continue to receive high quality services and services will be able to adapt to their changing needs.	Two per cent of adult Londoners identify as gay or lesbian, higher than the UK rate of 1.3 per cent. A further 0.6 per cent identify as bisexual and 0.6 per cent as other sexual identities.15 A recent survey of the UK's LGBT population found that 40 per cent had experienced an incident such as verbal harassment or physical violence because they were LGBT, and that they had lower levels of life satisfaction than the general UK population.  Only half of lesbian, gay and bi people (46 per cent) and trans people (47 per cent) feel able to be open about their sexual orientation and/or gender identity to their whole family.  A third of bi people (32 per cent) say they cannot be open about their sexual orientation with anyone in their family.

Goals for Reducing Straight Bias in Language: Reducing straight bias and increasing visibility of lesbians, gay men, and bisexual persons. Lesbians, gay men, and bisexual men and women often feel ignored by the general media, which take the straight orientation of their readers for granted. Unless an author is referring specifically to straight people, writing should be free of straight bias. Ways to increase the visibility of lesbians, gay men, and bisexual persons include the following: a. Using examples of lesbians, gay men, and bisexual persons when referring to activities (e.g., parenting, athletic ability) that are erroneously associated only with straight people by many readers. b. Referring to lesbians, gay men, and bisexual persons in situations other than sexual relationships. Historically, the term same-sex attraction has connoted sexual activity rather than a general way of relating and living. c. Omitting discussion of marital status unless legal marital relationships are the subject of the writing. Marital status per se is not a good indicator of cohabitation (married couples may be separated, unmarried couples may live together), sexual activity, or sexual orientation (a person who is married may be in a gay or lesbian relationship with a partner). Furthermore, describing people as either married or single renders lesbians, gay men, and bisexual persons as well as straight people in cohabiting relationships invisible. d. Referring to sexual and intimate emotional partners with both male and female terms (e.g., "the adolescent males were asked about the age at which they first had a male or female sexual partner"). e. Using sexual terminology that is relevant to lesbians and gay men as well as bisexual and straight people (e.g., "when did you first engage in sexual activity" rather than "when did you first have sexual intercourse").

	f. Avoiding the assumption that pregnancy may result from sexual activity (e.g., "it is recommended that women attending the clinic who currently are engaging in sexual activity with men be given oral contraceptives," instead of "it is recommended that women who attend the clinic be given oral contraceptives").
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