

# The Future Provision of Undress Uniform

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**Report to:**

Operational Delivery Board  
Commissioner's Board  
London Fire Commissioner

**Date:**

24 August 2022  
7 September 2022

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**Report by:**

Sally Hopkin, Assistant Director Procurement and Commercial

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**Report classification:**

For decision

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**For publication**

I agree the recommended decision below.



**Andy Roe**  
London Fire Commissioner

Date This decision was remotely  
signed on 16 September 2022

# PART ONE

## Non-confidential facts and advice to the decision-maker

### Executive Summary

Undress uniform is ceremonial wear which is issued to all London Fire Brigade (LFC) operational staff and control staff. Traditionally, LFC's requirement has been for premium quality cloth, personal measuring and bespoke tailoring service. The marketplace has changed over recent years, and this type of service has become increasingly expensive and unavailable. In this context, recent procurements conducted by the LFC have failed to deliver affordable solutions, and a wholesale change in strategy is now required regarding our requirements specification and approach to market.

This report outlines options and makes a recommendation for the provision of undress uniform.

#### Recommended decision(s)

That the London Fire Commissioner approves the changes set out in this report to:

1. Revise the LFC's requirement for undress uniform to a black standardized off the shelf specification as per option 1A, Appendix 3 - Options and Considerations of this report.
2. Restrict the personal issue of undress uniform to Station Officer and above only, and that Firefighter to Sub-Officer ranks use their current work wear for special events or a loan service as per option 1B, Appendix 3 - Options and Considerations of this report.
3. Approve the future use of existing garments as a loan service which will be centrally stored and distributed when required as per Option 1C, Appendix 3 - Options and Considerations of this report.
4. Delegate authority to the Assistant Director of Procurement and Commercial to set up a Clothing Board as per Option 4, Appendix 3 of this report.

# 1 Introduction and background

- 1.1 The LFC currently issues undress uniform to approximately 4900 operational staff (according to rank or role). Blue tailored undress uniform is issued to the ranks of Firefighter to Sub Officer. Black tailored undress uniform is issued to ranks from Station Officer to Assistant Commissioner, and to the roles of Deputy Commissioner and Commissioner. These uniforms are embellished with rank markings to make the individual ranks and roles identifiable.
- 1.2 The provision of undress uniform to match the LFC's current specification (which includes high quality cloth, bespoke measuring, and tailoring service) is challenging to source due to changes in the marketplace. There is now a scarcity of suppliers, especially those who can service our annual volumes, and this has resulted in higher costs to provide the service and led to several failed procurements. The service and the quality of products are available but at an extremely high cost to the LFC which is hard to justify when considered against the current budget pressures including the economic impacts of COVID within the GLA at large. Other emergency services and organisations have moved to off the shelf solutions for their undress uniform. The recommendations contained in this report have been made in accordance with these developments.
- 1.3 The LFC's two most recent suppliers, who were small local businesses, retired and terminated their contracts prematurely due to personal reasons which left the LFC without supply. Attempts to re-procure the requirements have attracted only one interested supplier who was willing to provide the service at an average cost increase of 126% compared to most recent contract prices (refer to Appendix 1, Table 2). This should be understood against a previous increase of 13% between 2016 and 2020. The changes in the marketplace have resulted in a continuing trend of high price increases.  
Other fire and rescue services
- 1.4 The larger Fire and Rescue Services (FRS's) comparable to LFC in size take the following approaches to issuing undress uniform:
- 1.5 Scotland FRS only provide personal issue undress uniform to Area Commanders and above. A loan service is operated from local stores for all other officers who require undress uniform for ceremonial events, funerals or disciplinaries.
- 1.6 West Midlands FRS issue made to measure undress uniform to Watch Managers and above. For Firefighter to Crew Manager, a loan service is operated via local stores.
- 1.7 Greater Manchester FRS provide a loan pool of black off the shelf undress uniform to all officers except for the CFO and ACFO who are provided with a made to measure undress uniform.
- 1.8 Other FRS's have been contacted regarding their arrangements for undress uniform. The majority only supply undress uniform to Station Officers and above.
- 1.9 Market engagement with one of the main undress uniform suppliers used by FRS's in the Home Counties indicated that they are at full capacity and therefore would not be able to provide their services to the LFC.
- 1.10 There is also a Framework put in place by Kent FRS for which the sole supplier is Hunter Apparel. This option was investigated however the undress uniform they are offering via the framework does not meet the LFC's current specification but could be suitable if the specification were revised to include standardised products.

## 2 Objectives and expected outcomes

- 2.1 The sections below details the recommended approach LFC should adopt based on the details provided in Section 1. Following the detailed recommendation, the report sets out the various options for the allocation and provision of undress uniform and considers advantages and disadvantages of each. The options can be seen in Appendix 3 of this report.
- 2.2 The recommended option is to review the current specification and align it with standardised off the shelf undress uniform, which is readily available in the marketplace. This will allow the LFC to restore the supply of undress uniform.
- 2.3 A decision to move away from the current specification and revise it to be in alignment with market capabilities will enable LFC to access a wider market, establish a secure supply, potentially make significant savings compared with current prices and reduce the risk of supply disruption. LFC are also recommended to align the nature and style of uniform and any associated service specification with what is procured by other emergency services.
- 2.4 A new style of undress uniform may require changes to the current brand image on undress uniform. To ensure LFC officers are identifiable as LFC representatives at ceremonial events, consideration will need to be given to how we transition from the current undress to the new requirement and ensure appropriate branding but without compromising the new standardised supply approach.
- 2.5 While senior officers' regularly wear their undress uniform, Firefighter to Sub-Officers do not use their undress uniform as often. Other fire and rescue services (such as Hampshire, Buckinghamshire, and Oxfordshire) have removed this provision for Firefighter to Sub-Officer and these officers are required to wear their everyday workwear at special events. Other FRSs offer a loan service for the less frequent users of undress uniform.
- 2.6 For LFC to adopt this approach it would require a policy change to be agreed by the Commissioner and directors. Changes will be required to policy 963 (Wearing of medals, decorations on undress uniform and ceremonial guidance for uniformed officers) and Policy 320 (Wearing of uniform and personal appearance). Both policies set out the expectations of when and how undress uniform should be worn by all officers.
- 2.7 Providing personal issue undress uniform to only Station Officers and above will reduce the volume of undress uniform purchased from approximately 550 to 100 per year at normal run rates, thereby achieving savings. The proposed change to allocation would result in a saving of approximately £150k based on the last contract price paid for undress per year - see Appendix 2, Table 5)
- 2.8 The above recommendation is a significant change to the way the LFC has historically provided undress uniform. If approved, the planned changes will be communicated to staff ahead of implementation. The message will set out the reasons for the change, the new approach and the benefits.
- 2.9 In summary, the decision to standardise the specification and provide undress uniform to Station Officers and above will enable supply to be reinstated, achieve best value and savings, as well as align the LFC approach with other fire and rescue services in how undress uniform is provided.

### 3. Equality comments

- 3.1 The LFC and the Deputy Mayor for Fire and Resilience are required to have due regard to the Public Sector Equality Duty (section 149 of the Equality Act 2010) when taking decisions. This in broad terms involves understanding the potential impact of policy and decisions on different people, taking this into account and then evidencing how decisions were reached.
- 3.2 It is important to note that consideration of the Public Sector Equality Duty is not a one-off task. The duty must be fulfilled before taking a decision, at the time of taking a decision, and after the decision has been taken.
- 3.3 The protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, marriage, and civil partnership (but only in respect of the requirements to have due regard to the need to eliminate discrimination), race (ethnic or national origins, colour or nationality), religion or belief (including lack of belief), sex, and sexual orientation.
- 3.4 The Public Sector Equality Duty requires decision-takers in the exercise of all their functions, to have due regard to the need to:
- eliminate discrimination, harassment and victimisation and other prohibited conduct.
  - advance equality of opportunity between people who share a relevant protected characteristic and persons who do not share it.
  - foster good relations between people who share a relevant protected characteristic and persons who do not share it.
- 3.5 Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular to the need to:
- remove or minimise disadvantages suffered by persons who share a relevant protected characteristic where those disadvantages are connected to that characteristic.
  - take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it.
  - encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
- 3.6 The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular steps to take account of disabled persons' disabilities.
- 3.7 Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:
- tackle prejudice
  - promote understanding.
- 3.8 The London Fire Commissioner and decision takers are required to have due regard to the Public Sector Equality Duty (s149 of the Equality Act 2010) when exercising our functions and taking decisions.
- 3.9 An Equality Impact Assessment (EIA) was undertaken on 8 August 2022.
- 3.10 The equalities impact assessment found there were no specific issues raised about the type of undress garments issued. The common theme raised by all groups who provided feedback was the need to ensure a consistent smart, style of undress that is available to all staff. This raised the issue that the policies underpinning the undress and the way it is worn will need to be revised and updated to set clear consistent guidance for wearers of undress.

- 3.11 The adverse impact of the current undress arrangements that were highlighted by the equalities groups included:
- 3.12 Flat lace up shoes to be made available to women who prefer to wear them with undress.
- 3.13 Clear guidance in policies 320 and 533 about the expected standard of undress, including non-operational staff at events like Wimbledon
- 3.14 There were no comments received by representatives of the following teams, WFS, LGBT, Parents and Carers, The Disability Working Group or The Menopause Action Group.
- 3.15 The proposed solution for undress will address concerns regarding availability of uniform and consistency of style and branding. The solution proposed will enable the LFC to move away from bespoke uniform to an undress uniform that is readily available across all staff groups. The associated policies will be updated in line with the new approach to the provision.
- 3.16 When exploring options for the future provision of undress, steps have been taken to understand the historical issues (such as sizing and the availability of female undress) and alleviate these challenges in any future contracts. This includes exploring the use of sizing guides with most suppliers offering online tools where officers can input their size and do a comparison between a store-bought item that fits them well. The standard off the shelf solutions that are available can be supplied in a large range of sizes and will be readily available with agreed lead times and should therefore alleviate the issues encountered with the availability of female uniform.

## **4. Other considerations**

### **Workforce comments**

- 4.1 The report author should consider any workforce issues which may/will arise as a consequence of the implementation of the report's recommendations. For example, resource implications or consultation with representative bodies.

### **Sustainability comments**

- 4.2 Sustainable development is in support of a change to policy 963 (Wearing of medals, decorations on undress uniform and ceremonial guidance for uniformed officers) and Policy 320 (Wearing of uniform and personal appearance) so that only Station Officers and above have undress uniform. This would reduce the climate change impact from the Brigade's procurement practices as less items would be purchased in the long term.
- 4.3 A possible issue with the change to a new supplier is that if existing uniforms become redundant, this could lead to a significant amount of waste, it would need to be ensured that the redundant uniform is recycled. This report suggests that undress uniform will no longer be procured through an SME, ideally, LFC will look to continue the use of SMEs provided they are able to deliver the LFC requirements.

### **Procurement comments**

- 4.4 Market conditions have changed meaning there are less suppliers in the market able to deliver the bespoke tailored undress uniform requirement of the LFC. The proposed procurement approach in terms of standardizing the requirement will address the challenges encountered by the procurement team to supply an undress uniform based on a bespoke specification. The LFC have become more dependent on SME's or sole suppliers to deliver this service with the suppliers finding it challenging to meet the demand. A standardised specification will produce economies of scale and alleviate the issue of disruption to supply by purchasing a uniform that is widely available in the market.
- 4.5 Issuing undress to station officer and above only will produce a significant saving as outlined in appendix 2, table 5, however this may be contentious as it is a different approach to the way undress has been issued to date.

- 4.6 The LFC have processes in place to address a circular economy with unwanted uniform being returned to the Brigade Distribution Centre to be recycled or re-used. The change in specification will improve these opportunities further as there will be a wider community for re-using unwanted garments and the less bespoke the items are, the more acceptable they'll be for re-purposing.

### **Communications comments**

- 4.7 The decision regarding the future provision of Undress uniform will impact clothing policies Policy 320 (Wearing of uniform and personal appearance), Policy 533 (and Personal Protective Equipment t excluding Structural PPE) and potentially policy 963 (Wearing of medals, decorations on undress uniform and ceremonial guidance for uniformed officers).
- 4.8 A communication strategy will be developed once a decision about the changes to the undress provision has been made and it is clear what impact this will have on the above policies.

## **5. Financial comments**

- 5.1 This report outlines options and makes a recommendation for the provision of undress uniform.
- 5.2 The Board is asked to note that a saving of £150k is envisaged if the proposal to allocate undress uniform to Station Officer and above only is approved. There may also be further savings from revising the LFC's requirement for undress uniform to a more standardised off the shelf specification or the future use of existing garments as a loan service. The potential savings for these are not clear at this stage.

## **6. Legal comments**

- 6.1 Under section 9 of the Policing and Crime Act 2017, the London Fire Commissioner (the "Commissioner") is established as a corporation sole with the Mayor appointing the occupant of that office. Under section 327D of the GLA Act 1999, as amended by the Policing and Crime Act 2017, the Mayor may issue to the Commissioner specific or general directions as to the manner in which the holder of that office is to exercise his or her functions.
- 6.2 By direction dated 1 April 2018, the Mayor set out those matters, for which the Commissioner would require the prior approval of either the Mayor or the Deputy Mayor for Fire and Resilience (the "Deputy Mayor").
- 6.3 The Commissioner has the authority to decide "Any other matters that the Commissioner wishes to decide, or any matter which officers, with the agreement of the Commissioner, seek to refer to the Commissioner". Therefore, the decision to agree the proposed recommendations in this report to; revise the LFC's requirement for undress uniform to a black standardized off the shelf specification; restrict the personal issue of undress uniform to Station Officer and above only; and that Firefighter to Sub-Officer ranks use their current work wear for special events or a loan service and approve the future use of existing garments as a loan service which will be centrally stored and distributed.
- 6.4 The proposed recommendation is also for the Commissioner to delegate authority to the Assistant Director, Procurement and Commercial to set up a Clothing Board which is also permitted under Part 4 of the LFC Scheme of Governance.
- 6.5 The statutory basis for the actions proposed in this report is provided by section 5A of the Fire and Rescue Services Act 2004 ("FRSA 2004"). Under Section 5A the Commissioner has the power to procure personnel, services and equipment they consider appropriate for purposes incidental or indirectly incidental to their functional purposes.

## **List of appendices**

Appendix	Title	Open or confidential*
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<b>1</b>	<b>Pricing Comparison Hunter Apparel and Waterfront</b>	<b>Open</b>
<b>2</b>	<b>Undress Purchasing Figures 2019</b>	<b>Open</b>
<b>3</b>	<b>Options and Considerations</b>	<b>Open</b>
<b>4</b>	<b>Procurement History</b>	<b>Open</b>
<b>5</b>	<b>Equalities Impact Assessment</b>	<b>Open</b>



## Appendix 1 Pricing comparison Hunter Apparel and Waterfront

All prices should include delivery and all costs associated with providing a finished product.

**Table 1 - Core List of items**

<b>Garment List</b>	<b>Waterfront Prices (Current Supplier) 2016-2020</b>	<b>Hunter prices (Recent tender submission 2020) April 2020</b>	<b>% Difference between Hunter and Waterfront</b>
JACKET, UNDRRESS, BLACK with buttons and medal ribbons	£674.45	£963.82	42.90%
TROUSERS, UNDRRESS, BLACK	£187.77	£494.30	163.25%
SKIRT, UNDRRESS, BLACK	£192.70	£401.61	108.41%
JACKET, UNDRRESS, BLUE with buttons and medal ribbons	£209.59	£947.62	352.13%
TROUSERS, UNDRRESS, BLUE	£184.61	£440.97	138.87%

**Table 2 – Full Ensemble**

<b>Supplier Ensemble</b>	<b>Waterfront Prices (Current Supplier) 2016-2020</b>	<b>Hunter prices (Recent tender submission 2020) April 2020</b>	<b>% Difference between Hunter and Waterfront</b>
Black Undress ensemble Trousers	£862.22	£1,458.11	69%
Black Undress ensemble Skirt	£867.15	£1,365.42	57%
Blue Undress ensemble	£394.20	£1,388.59	252%
Average Change %			126.28%
Budgeted Spend	£250,000	£565,689	

## Appendix 2 Undress Purchasing Figures 2019

**Table 5 – Undress 2019**

<b>Garment List</b>	<b>Quantity Purchased 2019</b>	<b>Waterfront Price Paid</b>	<b>Total cost of Senior Officer undress</b>	<b>Total cost of undress for Firefighter to Sub officer</b>	<b>Total</b>
JACKET, UNDRESS, BLACK with buttons and medal ribbons	83	£674.45	£55,979.35		£55,979.35
TROUSERS, UNDRESS, BLACK	83	£187.77	£15,584.91		£15,584.91
SKIRT, UNDRESS, BLACK	8	£192.70	£1,540.60		£1,541.60
JACKET, UNDRESS, BLUE with buttons and medal ribbons	384	£209.59		£80482.56	£80,482.56
TROUSERS, UNDRESS, BLUE	384	£184.61		£70,890.24	£70,890.24
<b>Total</b>			<b>£73104.86</b>	<b>£151,372.80</b>	<b>£224,477.66</b>

## **Appendix 3 - Options and Considerations**

### **Option 1A – Standardise the Specification (Recommended)**

Research into what other organisations are doing regarding undress uniform suggests that significant savings can be made by moving to a standardised specification for undress uniform. Currently most of the Fire and Rescue services (except the LFC) provide black undress uniform to all their operational staff. Adopting this approach would allow for far greater scope for LFC to collaborate with other organisations to procure and produce economies of scale.

One framework has been identified which would enable LFC to save on the cost of undress:

#### **Kent FRS Framework**

This option was explored prior to the most recent procurement round however the uniform does not meet our specification and was rejected by the Central Operations team. If a revision of the current specification is agreed, this option could be revisited.

The annual budget for this provision will be approximately. £74k to provide all officers with full undress ensemble (Jacket and trousers/skirt) and £13k to provide undress uniform to senior officers only.

#### **Revised Specification**

To achieve a revised specification, it is proposed a small project team be tasked with achieving this. This must be carried out with including a review of the current market offerings and consider the way forward for staff sizing.

### **Option 1B – Reduce Volumes**

The recommendation regarding allocations is for personal issue undress uniform to be provided only to Station Officer and above as the most frequent wearers of undress uniform with an alternative solution made available for fire fighter to Sub officers. The LFC currently procures approximately 550 uniforms per year and providing undress to Station Officer and above only would reduce this to approximately 85-100 uniforms per year. Other FRS's have adopted this approach to allocating undress uniform and require Firefighter to Sub officer grades to wear workwear at special events or utilise a hire service.

LFC have approximately 206 staff awaiting uniform with no supplier to provide undress uniform. The current specification was used to go out to the market via the YPO framework and Hunter Apparel submitted a tender. The Hunter Apparel option does not represent best value for the Brigade and if we were to reduce our demand the cost would increase again, and this agreement may not be economically sustainable for them. Currently the only service we can provide to officers are rank mark changes and minor alterations which are being provided by a local supplier and claimed back via expenses.

The Procurement Operations Category have also collected several garments from Retiring officers and samples to try and meet any immediate demand.

This solution is not sustainable and will become more challenging with increase promotion rounds and as officer attend additional meetings and community events as we emerge out of the pandemic.

### **Option 1C – Loan service**

Currently almost all operational staff are allocated an undress uniform which represents a considerable investment. It has been previously proposed that staff are not personally allocated an undress uniform. The current LFC inventory of garments already allocated would be collected centrally to provide a loan pool for all staff when they are required. This would require storage and organisation of a range of garments that can be distributed through the organisation with a period of notice.

Dry Cleaning of these items could be managed via the current laundry contract. This would require space and capacity at the OSC and day van service.

The loan option has previously been discounted as not viable by the previous Director of Operations. The LFC issue undress uniform to approximately 4000 staff. If there is a large event where all officers are

required to wear undress uniform it would not be practical for a supplier to issue undress to all the officers and with the correct rank markings.

The option could be explored further if a decision is taken to issue undress to senior officers only. It would however require further time and could delay the resolution of the current supply issues. Furthermore, there is no surety at this stage that a loan service would be feasible and provide best value.

Consideration would be required for staff who are in limited number size ranges to ensure they are not disadvantaged. If this option were pursued, we would recommend that for staff which fall into these categories they are still allocated a personal issue blue undress.

### **Option 2 – Accept the Hunter proposal**

The single bid received from the most recent tendering exercise, based on the current LFC undress specification attracted a cost of £1,365.42 - £1458.11 for the black undress uniform and approximately £1,388.00 for the blue undress uniform. To deliver this the budget for undress uniform would need to be increased to approximately £565k (Appendix 1 table 1).

This option enables the LFC to provide a professional undress uniform that complies with the current specification. There are a limited number of suppliers able to deliver this type of service in the market as demonstrated by the previous procurement cycles. Suppliers in the market are often small medium enterprise's which presents a risk to the LFC if there are any interruptions to service on the supplier's side or a sharp increase in demand from the LFC. In addition to the cost of the suit the LFC have previously incurred additional costs for material due to the limited availability of the specified material in the market.

The annual budget required to proceed with this option will be approximately £565k, this can be framed against a historic annual cost of £250k.

### **Option 3 – Re-procure the requirement against the current specification**

Re-procuring this requirement with the current specification is likely to result in a similar outcome to that of the previous attempt. Limited availability of suppliers who can deliver this requirement, high service and delivery costs and limited availability of the bespoke material required to supply this provision consistently.

The last three procurement cycles have established that there have been no significant changes in the market that would make this a viable option. This is also not in line with what other FRS's and public service organisations with a similar requirement are doing.

If this option was chosen it is Procurement's belief that we would receive no bids and that if bids were received, they would result in a considerable increase against stations clothing budgets.

The anticipated budget for this provision would be approximately £500k per annum or to provide undress uniform to senior officers only will be £80k

### **Option 4 – Development of a Clothing Board**

Delegated approval should be given to the Assistant Director of Procurement and Commercial to develop a clothing board. This should be considered in conjunction with the above options and will require an operational lead at a minimum grade of Assistant Commissioner to chair the board and make decisions on behalf of operational colleagues. The terms of reference will be agreed. The board will promote a consistent approach to considering uniform change requests, enable better control of uniform requirements across the LFC and ensure that the decisions made are reflected in the associated policies.

### **Objectives and Expected Outcomes**

A decision on the future approach to the procurement of undress.

A standardised specification will allow the procurement to align the provision with market changes, collaborate with other public sector bodies with similar requirements and overcome the challenges historically encountered with disruption to the supply of undress uniform.

There are significant savings that can be made by revising the way we provide undress as demonstrated in option 1.

## **APPENDIX 4 – Procurement History**

- 1.1** The current specification for undress uniform dates back to 2009 and is based on a Home Office military specification that has not been significantly updated since the original was produced. The results of the previous rounds of procurement are summarised below:
- 1.2** 2009 undress procurement: 15 expressions of interest with one bid received at tender stage. A contractual agreement was in place from 2009 -2014, extended to 2016 due to an unsuccessful retender in 2014.
- 1.3** 2016 a contract was awarded via the Firebuy framework for uniform and clothing. The agreement was terminated in 2020 when the supplier retired at short notice.
- 1.4** A review of the undress specification was completed in 2019, in consultation with the Central Operations team. The aim was to standardise the uniform, lower the cost, and make the requirement more attractive to suppliers within the market. The review only resulted in minor changes and the preference at the time was to maintain the quality and style of the undress uniform and continue with the bespoke measuring and tailoring service.
- 1.5** In 2020 the price of cloth began to rise sharply and the number of suppliers in the market to support this provision reduced, thereby making this type of product and service even more expensive.
- 1.6** In April 2020, the requirements were tendered under a mini competition via the YPO framework with one bid received. The prices per garment were between 42% and 352% higher than our previous contract with Waterfront Ltd (refer to Appendix 1, Table 1 for further details). The average increase across the ensemble was 126%. The costs received are set out by garment in Appendix 1, Table 2.
- 1.7** The tendered prices were high due to the amount of resource required to deliver the high level of service required. Given market conditions, if LFC continues with its current specification and requirements, the prices are likely to continue increasing and it is becoming more difficult to justify those higher costs rather than changing the requirements to align with the market's capabilities and to ensure that pricing for standardised undress uniform becomes more affordable. It is therefore recommended that LFC changes its requirements to reflect the approach adopted by other FRS and to seek off-the-shelf solutions without the personal measuring and tailoring service.
- 1.8** In recent years the decrease in Firefighter Development (FFD) has reduced the amount of undress uniform required to an annual spend of £250K with Waterfront Ltd. This has provided a temporary absorption of the increasing costs for the undress uniform which would otherwise be encountered with an increase in FFD. It is anticipated that the FFD will increase at some point in the future. The Hunter Apparel offer received via the YPO framework would have resulted in an annual spend of approximately £565k that will increase further when FFD extends.
- 1.9** Numerous complaints have been received from officers regarding high prices. If the bid from Hunter Apparel had been accepted, this would have exacerbated the pressure on Station commanders' budgets and would have been controversial.

## APPENDIX 5 – Equalities Impact Assessment

### 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?

The Provision of Undress Uniform

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

High		Medium	X	Low	
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#### 2. Contact details

Name of EIA author	Anouska Herman
Department and Team	Procurement
Date of EIA	04/05/2022

#### 3. Aim and Purpose

What is the aim and purpose of the policy, project, decision or activity?	The purpose of the decision is to inform the way that undress uniform is provided to officers in the future. Taking in to account the various challenges currently encountered in providing undress.
Who is affected by this work (all staff, specific department, wider communities?)	LFB operational and control staff.

#### 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>Consultation has taken place with the following groups to understand the impact on under-represented groups of staff:</p> <p>Karen Bell/Amit Malde - (FBU Black Ethnic Minority Members (BEMM) rep)</p> <p>Serena Benassi – Women in the Fire Service</p> <p>Sally Brookes/Katie Holloway – Womens Action Committee</p> <p>Sharon Biggs – Menopause Action Group</p> <p>Dalvear Virdee/Hardeep Dale – Asian Fire Service Association</p>
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**4. Equality considerations:** the EIA must be based on evidence and information.

	<p>Sue Naylor – Disability Working Group Simon Bampfylde/Mark England – Parents and Carers Imtiaz Hussain/Mark Rodgers – LGBT+ Support Group</p> <p>The above named representatives have been contacted to get an understanding of the impact of Undress uniform on different staff groups. Lessons learned from the last Undress contract have been taken into account and considered when proposing options for the future requirement. One of the options proposed include the development of a clothing board which will provide a platform for discussion and development of future clothing requirements. The procurement department are also developing surveys and mailboxes to capture the views of end users.</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?
<b>Age</b> (younger, older or particular age group)	Neutral	<p><b><i>Undress uniform is available to all Operational and control staff. In addition it has been rolled out to FRS staff for specific events.</i></b></p> <p><b><i>It is not envisaged that there will be any impact on staff due to age.</i></b></p>	<p><b>Staff:</b> You may need to gather data on staff. <a href="#">Basic equalities data is available here</a> (select the most recent data document)</p> <p>If you need specific data on a department, contact the <b>HR People Management Information Team</b> - <a href="mailto:pshrpmi@london-fire.gov.uk">pshrpmi@london-fire.gov.uk</a> – no less than <b>five working days'</b> notice must be given for all data requests.</p> <p><b>Community/Public:</b> you may need data from the <a href="#">GLA Datastore</a>.</p>
<b>Disability</b> (physical, sensory, mental health, learning disability, long term illness, hidden)	Adverse	<p><i>The future provision of undress uniform will require a revision of policies 320 (Wearing of uniform and personal appearance), 963 (Wearing of medals, decorations on undress uniform and ceremonial guidance for uniformed officers) and 533 (Uniform and PPE).</i></p> <p>Advice will be sought from the Disability Working Group, Neurodiversity support group and the Learning support team about the best way to communicate these changes to staff.</p>	<p><b>Staff:</b> You may need to gather data on staff. <a href="#">Basic equalities data is available here</a> (select the most recent data document)</p> <p>If you need specific data on a department, contact the <b>HR PMI Team</b>- <a href="mailto:pshrpmi@london-fire.gov.uk">pshrpmi@london-fire.gov.uk</a> – no less than <b>five working days'</b> notice must be given for all data requests.</p> <p>You may need to contact the <b>Learning Support Team, Disability Working Group or Neurodiversity Support Group</b> for advice and data on accessibility.</p>

			<b>Community/Public:</b> you may need data from the <a href="#">GLA Datastore</a> .
<b>Gender reassignment</b> (someone proposing to/undergoing/ undergone a transition from one gender to another)	Neutral	<i>It is not envisaged that there will be an adverse impact to individuals proposing to, undergoing or who have undergone gender re-assignment.</i>  <i>A review of the language in the associated policies should be considered in line with the future provision of undress.</i>	<b>Staff:</b> You may need to gather data on staff. <a href="#">Basic equalities data is available here</a> (select the most recent data document)  If you need specific data on a department, contact the <b>HR PMI Team</b> - <a href="mailto:pshrpmi@london-fire.gov.uk">pshrpmi@london-fire.gov.uk</a> – no less than <b>five working days</b> ' notice must be given for all data requests.  You may need to contact the LGBT+ Staff Network or Stonewall for advice. <b>Community/Public:</b> you may need data from the <a href="#">GLA Datastore</a> .
<b>Marriage / Civil Partnership</b> (married as well as same-sex couples)	Neutral	<i>No impact</i>	
<b>Pregnancy and Maternity</b>	Adverse	<i>Currently maternity undress uniform is not available.</i>  <i>Consideration will need to be given on how the future provision can incorporate pregnancy and maternity requirements.</i>	You may need advice from the <b>HR Helpdesk:</b> <a href="mailto:IT.HR@london-fire.gov.uk">IT.HR@london-fire.gov.uk</a>  You may need data from the <a href="#">GLA Datastore</a> .
<b>Race</b> (including nationality, colour, national and/or ethnic origins)	Positive	<i>The proposed options for the future provision of undress will increase the availability of undress to all staff groups.</i>	<b>Staff:</b> You may need to gather data on staff. <a href="#">Basic equalities data is available here</a> (select the most recent data document)  If you need specific data on a department, contact the <b>HR PMI Team</b> - <a href="mailto:pshrpmi@london-fire.gov.uk">pshrpmi@london-fire.gov.uk</a> – no less than <b>five working days</b> ' notice must be given for all data requests.  <b>Community/Public:</b> You may need data from the <a href="#">GLA Datastore</a> .
<b>Religion or Belief</b> (people of any religion, or no religion, or	Neutral	<i>The availability of undress garments should not adversely impact any specific groups. Consideration will need to be</i>	You may need data from the <a href="#">GLA Datastore</a> .

people who follow a particular belief (not political)		<i>given to religious wear when updating the associated policies.</i>	
<b>Sex</b> (men and women)	Positive	<p><i>The proposed solutions should improve the availability of undress garments to women.</i></p> <p>It has been highlighted that women are currently disproportionately affected by the lack of undress currently available. The future provision should address this challenge.</p> <p>This will be addressed by procuring readily available undress and revising the associated policies.</p>	<p><b>Staff:</b> You may need to gather data on staff. <a href="#">Basic equalities data is available here</a> (select the most recent data document)</p> <p>If you need specific data on a department, contact the <b>HR PMI Team</b>- <a href="mailto:pshrpmi@london-fire.gov.uk">pshrpmi@london-fire.gov.uk</a> – no less than <b>five working days</b>' notice must be given for all data requests.</p> <p><b>Community/Public:</b> You may need data from the <a href="#">GLA Datastore</a>.</p>
<b>Sexual Orientation</b> (straight, bi, gay and lesbian people)	Neutral	<p>It is not envisaged that the proposed solution will effect individuals based on sexual orientation.</p> <p>The language used in the associated policies should be reviewed.</p>	<p><b>Staff:</b> You may need to gather data on staff. <a href="#">Basic equalities data is available here</a> (select the most recent data document)</p> <p>If you need specific data on a department, contact the <b>HR PMI Team</b>- <a href="mailto:pshrpmi@london-fire.gov.uk">pshrpmi@london-fire.gov.uk</a> – no less than <b>five working days</b>' notice must be given for all data requests.</p> <p>You may need to contact the <b>LGBT+ Staff Network</b> or <b>Stonewall</b> for advice.</p> <p><b>Community/Public:</b> you may need data from the <a href="#">GLA Datastore</a>.</p>

<b>6. Impacts outside the Equality Act 2010</b>
<b>What other groups might be affected by this policy, project, decision or activity?</b>
Consider the impact on: carers, parents, 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.
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?

<b>7. Legal duties under the Public Sector Equality Duty (s149 Equality Act 2010)</b>
How does this work help LFB to:

<b>Eliminate discrimination?</b>	Improved availability of undress uniform for all undress wearers. Consistency of standard of undress uniform, branding and guidance on wearing undress. Revised policies to make it fairer for all undress wearers. Lessons learned incorporated in future requirement All black undress uniform proposed for all staff to counteract gradeism.
<b>Advance equality of opportunity between different groups?</b>	Women have been disproportionately affected by the undress provision with their being a shortage of female tailors and less stock of women's undress uniform available. The proposed solution is to provide off the shelf undress that will be readily available to women. The policy regarding footwear for women will also be reviewed to set a suitable and fair standard.
<b>Foster good relations between different groups?</b>	

<b>8. Mitigating and justifying impacts</b>		
Where an <b>adverse</b> impact has been identified, what steps are being taken to <b>mitigate</b> it? If you're unable to mitigate it, is it <b>justified</b> ?		
<b>Characteristic with potential adverse impact (e.g. age, disability)</b>	<b>Action being taken to mitigate or justify</b>	<b>Lead person responsible for action</b>
Pregnancy and Maternity	Staff surveys, mailbox for concerns. Work with Parent and Carers ESG to identify ways of improving provision. Policy review.	Procurement
Disability	Work with DWP to establish the best way to communicate policy changes.	Procurement

### **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)		Date	
Sign off by Inclusion Team		Date	
Stored by			
Links			
External publication	Are you happy for this EIA to be published externally?	Yes <input type="checkbox"/>	No <input type="checkbox"/> If No state why:

**Part two confidentiality**

Only the facts or advice considered to be exempt from disclosure under the FOI Act should be in the separate Part Two form, together with the legal rationale for non-publication.

**Is there a Part Two form:** NO

**Originating officer declaration**

Reporting officer to confirm the following by using 'x' in the box:

**Reporting officer**

**Anouska Herman** has drafted this report and confirms the following:

**1. Assistant Director/Head of Service**

**Sally Hopkin, Assistant Director, Procurement and Commercial** has reviewed the documentation and is satisfied for it to be referred to Board for consideration

X

**2. Advice**

The Finance and Legal teams have commented on this proposal:

**Saminara Rahman, Legal Advisor**, on behalf of General Counsel (Head of Law and Monitoring Officer).

**Financial Advisor**, on behalf of the Chief Finance Officer.

X