

## Operational Contingency Arrangements (OCA): Future Contract 2023 to 2029

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**Report to:**

Operational Delivery Board  
Investment & Finance Board  
Commissioner's Board  
Deputy Mayor's Fire and Resilience Board  
London Fire Commissioner

**Date:**

29 July 2022  
25 August 2022  
7 September 2022  
22 September 2022

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**Report by:**

Pat Goulbourne, Assistant Commissioner Operational Resilience and Control

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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 21 November 2022

# PART ONE

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

### Executive Summary

The London Fire Brigade (Brigade) has a duty under the Civil Contingencies Act 2004 to plan for the purpose of ensuring, "so far as is reasonably practicable", that if an emergency were to occur, the Brigade would still be able to continue to perform its functions. The current arrangements, known as Capital Guard, are the contingency measures implemented during times when gaps in normal service provision, operational response, and control, are experienced.

This report sets out the recommendations for a new contract to provide for the operational contingency crews (OCC) during periods of workforce disruption. This follows a tendering process that has been completed as part of a wider project for operational contingency arrangements (OCA).

### For the London Fire Commissioner

The LFC approves the expenditure as set out in the in Part Two of this report and delegates authority to the Assistant Director Procurement and Commercial to enter into and, on the expiration of the initial term, extend the contractual arrangements set out in this report with the successful supplier.

## 1 Introduction and Background

- 1.1 The Brigade has a duty under the Fire and Rescue Services Act 2004 (FRSA), section 7, in relation to firefighting, protecting life and property in the event of fires in its area, and in doing so, it must secure the provision of personnel, services and equipment necessary to efficiently meet all normal requirements. A duty also applies under section 8, of the FRSA, in respect of road traffic collisions. Section 9 of the FRSA deals with additional 'emergencies' other than fires and road traffic accidents.
- 1.2 Furthermore, under section 2 of the Civil Contingencies Act 2004 (CCA), the Brigade must formulate and maintain plans, for "emergencies" for the purpose of ensuring, "so far as is reasonably practicable", that if an emergency were to occur, the Brigade would still be able to continue to perform their functions. Such emergencies include an event or situation that threatens serious damage to human welfare, the environment or war, terrorism, or security of the United Kingdom.
- 1.3 To comply with this legislation and to ensure an emergency provision was in place, in 2014 the Brigade entered a contract with Securitas Security Services (UK) Ltd to establish an emergency fire crew capability contract (EFCC). These arrangements support internal provisions known as Capital Guard, these are the contingency measures implemented during times when normal service provision, operational response, and control, are not able to be provided. This includes events such as flu pandemics or strike action taken by a representative body.
- 1.4 The contract expired in November 2020 and extension arrangements were triggered that has enabled the service to continue for a maximum of three years This extension is due to end in November 2023 and as such a new arrangement needs to be put in place.

- 1.5 The existing contract is worth £4.6 million per annum in 2021/22 and £4.8 million in 2022/23. This is to maintain a steady state. Further costs are incurred if the capability is required to be stood up and deployed.
- 1.6 The EFCC contract secures the provision of trained operational contingency crews, command support teams and contingency control call handling staff needed to a response in times of activation of Capital Guard. This is a necessary control measure for periods of service disruption which is an identified risk in the LFC corporate risk register and national security risk assessment.
- 1.7 In order to support the Capital Guard arrangements, it is proposed that a further contract is agreed to provide these contingency crews for periods of workforce disruption and that from the point of implementation the service personnel provided by that Contractor should be referred to as the Operational Contingency Crews (OCC). This is to signify the change in arrangements and to avoid any confusion with professional firefighters during periods when the capability is stood up.
- 1.8 The new contract will be for a period of six years with an option to extend for a further three years.
- 1.9 The recent tendering process has reached evaluation stage using a new operational specification for the requirements of LFC. Though numerous changes have been made to this specification the underlying themes of this new specification which differentiate it from the previous specification are as follows:
- 1.10 The new specification has removed the requirement for the Contractor to approach incidents in defensive mode by default. Instead, this has been replaced with an emphasis on having a capability with the ability to assess every incident for its needs and to respond accordingly in defensive or offensive mode. This is necessary to adapt to the changing risk in the built environment and from climate change.
- 1.11 The new specification has removed the specific requirement to have command support teams (CST) in separate vehicles for deployment to incident. Instead, the requirement is now for suitable and sufficient command and control to be available for every incident. However, how the contractor decides to fulfil this obligation is up to them.
- 1.12 The new specification has removed detailed guidance about how individuals should be trained or recruited and instead replaced these with references to national guidance and best practice in the fire sector. This represents a key change in the tone where the specification previously focused on outputs required of the Contractor it now focuses on them delivering the outcomes expected.
- 1.13 In order to manage the future contract more effectively, there is now a new requirement on the contractor for them to implement their own assurance framework. Whilst this includes provision of LFC to carry out independent assurance, the increased responsibility on the contractor to provide this themselves is consistent with LFC's own strategic direction and conveys greater ownership over the quality of service provided, to the provider itself.
- 1.14 The new specification builds on lessons learned from previous periods of workforce disruption and has sufficient flexibility to be deployed from either fire stations or alternative locations if required. As modelling suggests the best attendance times will be achieved from maximising the number of deployment locations so the use of the LFC estate will be the default option unless the decision is made that operational effectiveness would benefit from the use of alternative locations.
- 1.15 The timetable is influenced by the need to have a replacement contract in place prior to the expiry of the current provision in November 2023 that cannot be extended. A replacement contract can supersede the current arrangements at an earlier date if it is ready to be implemented at the discretion of the London Fire Commissioner (LFC). A notice period of six months is required for the current contract. An implementation period of up to a year is preferable for the contractor.

Project Phase	Task	Time Frame	Start date
Tender Period	Governance process		July to Sep 22

	Clarification and Evaluation of tenders	3 Months	Aug-Sep 22
	Award report drafting	2 Months (Parallel to Evaluation)	Aug-Sep 22
	Reporting period	4 months	August – November 2022
	Standstill period	10 days	Nov-22
	Contract Award		Nov-22
Implementation & lead up to go live	Implementation period		November 2022 – November 2023
	Go Live with new provider / contract		Nov-23

## 2 Objectives and Expected Outcomes

- 2.1 This contract will deliver a retender of the current EFCC arrangements to replace the existing contract with a new contract for OCC. This fulfils a key objective of the paper first presented at Commissioner's Board on 10 March 2021. It must be in place at the latest by 13 November 2023, when the current extended contract terminates on 12 November 2023. There is also a significant implementation process required prior to this date.
- 2.2 To enable the Brigade to continue to function in times of total staff loss or other interruptions to service delivery in line with Fire and Rescue Services Act (FRSA) 2004, Civil Contingencies Act (CCA 2004, Fire Services National Framework (FSNF) 2018. The replacement OCC contract will enable the Brigade to meet its legal requirements by the end of the existing contingency arrangement contract on 12 November 2023.
- 2.3 The project will seek to secure areas of improvement in all aspects of OCC contingency arrangements and will be regularly monitored and governed through Key Performance Indicators (KPI) and utilising the assurance framework which will be in place by the implementation date.
- 2.4 The procurement process for the EFCC contract is a significant corporate undertaking noted in the corporate risk register and requires sufficient support to manage the process from across the organisation.
- 2.5 The future OCC arrangements require a more bespoke response by the Contractor. Their service personnel are no longer responding to incidents in Delta (defensive) mode by default. Rather the arrangements require the contractor to be able to respond in either Delta (defensive) or Oscar (offensive) mode and to provide adequate command and control to risk assess this for every incident.
- 2.6 The future OCC arrangements will default to using the LFB estate as the attendance locations. These locations are the geographical areas which the appliances are distributed from, and which currently are limited by the third-party provider (the Territorial Army) to 13. By utilising the LFB estate an optimum spread of appliances can be achieved.
- 2.7 The current standards for EFCC crews are based on first appliance attending in 10 minutes, the second appliance attending in 15 minutes and 95% of all first attendances within 20 minutes. Modelling indicates that this would be possible with the use of a minimum of 22 locations which is not possible with the current arrangements, but the future proposal would facilitate.
- 2.8 Sufficient flexibility is included in the proposed arrangements that LFC could require the contractor's service personnel to ride across 32 fire appliances rather than 27. As this would still provide a minimum of five service personnel per appliance, this is in keeping with standard practice in the sector. As the appliances are provided by LFB there is also minimal additional cost associated with this request, but it would allow LFC to

deploy OCC from up to 32 locations. However, it should be noted that the default position will be for the contractor to ride with six per appliance as per current arrangements.

2.9 The table below indicates the benefits of the improved attendance times in the future contract and the flexibility which exists to achieve even lower attendance times if the LFB wishes to utilise 32 fire appliances in contingency arrangements.

	<b>1<sup>st</sup> appliance</b>	<b>2<sup>nd</sup> appliance</b>
<b>Current EFCC standard</b>	10 mins	15 mins
<b>27 fire stations</b>	8 mins 28 seconds	12 mins 55 seconds
<b>32 fire stations</b>	7 mins 45 seconds	12 mins 5 seconds

- Further benefits of using the LFB estate have been identified as the currency of operational risk information on the mobile data terminals (MDTs) is dependent on the network connection at stations.
- While some arrangements will need to be made for LFB employees at selected stations to undertake standbys for shifts which cover start and finish time of industrial action there is minimal disruption to LFB operations with the use of the estate. One of the key benefits is that appliances selected for use by contingency crews would no longer have to be removed from regular use for the duration of the action. They would remain operationally available outside of direct periods of industrial action.

### 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 opportunity to review arrangements for the OCC capability is an opportunity to consider how this response can be provided with greater regard to the known risks and characteristics of London. Thereby providing a contingency arrangement which better reflects the needs of London and Londoners. The emphasis on using the existing LFB estate as attendance locations is intended to provide better equity of cover than is currently possible by using third party locations to deploy from.
- 3.9 An Equality Impact Assessment (EIA) has been carried out and has identified several adverse impacts. Following meetings with the Equalities team and further consultation with community safety the adverse impacts are all believed to be around the groups who are already vulnerable to fire. For these groups there is an inherent risk for any period where fire cover is reduced from normal business.
- 3.10 The groups identified in the EIA and the data drawn from Community Safety will be used to inform the departmental products. This is a work-stream which will take place before implementation of the new arrangements and which will aim to mitigate some of the increased risk by implementing further control measures for these groups.

## 4. Other considerations

### Procurement

- 4.1 The procurement route undertaken is a one stage Open Procedure in line with the Public Contract Regulations (as amended). It is not anticipated due to the nature of this contract and the current market that there will be a large number of potential tenderers and so a restricted procedure was not required.
- 4.2 The procurement and legal resource required for this project has been considerable, with the necessary procurement manager funded as part of the project during the drafting stage of the documentation. The project is now supported by an additional Procurement Project Manager as a development opportunity within the Procurement Department with the Head of Commercial - Operations leading this Procurement
- 4.3 Tenders were received on 16<sup>th</sup> August. Following this a thorough evaluation process will be undertaken with representatives from Operational Resilience, Training and Development, Fleet & OSG, Health and Safety and People Services. It is anticipated that the evaluation process will be completed by 30 September 2022 to allow sufficient time to award and secure a full year implementation process with a view to the new arrangement being in place prior to the deadline of 13 November 2022.
- 4.4 This implementation and launch of this project will be key and will require dedicated resource from a range of Brigade Departments. A formal project plan will be published following award.
- 4.5 Once implementation commences a full review of Capital Guard will be required to ensure all products meet with the new requirement. All Departments who own products will have to engage in the process which will be led by Operational Resilience.

## **Sustainability**

- 4.6 The procurement activity will be undertaken in accordance with the Public Contract Regulations (as amended), LFC's Scheme of Governance and the GLA group Responsible Procurement policy. Where new policies and/or corporate projects arise, they are subject to the Brigade's sustainable development impact assessment process (SDIA).
- 4.7 The nature of the Contract means that for any periods during which it has been deployed the Contractors carbon footprint is likely to be significantly lower than that which LFB would normally operate with due to the more modest size of the workforce in operation as well as the reduction in estate use and vehicle movements.

## **Strategic Drivers**

- 4.8 The London Fire Commissioner (LFC) has a duty to provide contingency arrangements to cater for periods of industrial action or other occasions when normal resourcing arrangements are unable to be met.
- 4.9 Following a briefing paper (OCA) which was presented at CB on 10 March 2021 it has been decided that a blended approach should be pursued with a view to replacing and improving the current EFCC arrangements by November 2023.
- 4.10 The proposals in this paper focus on the operational contingency arrangements provided by the Contractor for the core service. This is part of a wider project to consider all contingency arrangements and further work on resilience contracts and provision of specialist assets will be forthcoming as part of that wider project for Operational Contingency Arrangements (OCA).

## **Workforce Impact**

- 4.11 As this paper outlines the need to engage with the Representative Bodies there is an impact upon the workforce.
- 4.12 The area of contingency arrangements for periods of industrial action is a sensitive topic which must be explored with care and due consideration to avoid unnecessary confrontation with representative bodies.

## **Communications comments**

- 4.13 The LFC workforce will need to be informed that the future arrangements will be referred to as Operational Contingency Crew (OCC) rather than Emergency Fire Crew Capability (EFCC).
- 4.14 Arrangements for how the OCC and LFC crews will work alongside each other are not expected to change from previous arrangements so there are no new operational training requirements which will require communication.
- 4.15 Communication to LFC staff is expected to be required at two key junctures. On implementation of the new arrangements and prior to any expected deployment of such arrangements. It is envisaged that previous mediums would be sufficient, and that Hotwire and Big Learning can be used to do this.

## **5. Financial comments**

- 5.1 This report recommends that annual revenue funding is agreed to cover the implementation of the new arrangements for Operational Contingency Crews (OCC). This will be incurred in the 2023/24 financial year and end in the 2029/30 financial year.
- 5.2 Full details of the upper cost envelope are contained within Part Two of this report due to the commercial sensitivity.

## 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.
- 6.2 Section 1 of the Fire and Rescue Services Act 2004 ("FRSA") states that the Commissioner is the fire and rescue authority for Greater London.
- 6.3 Section 7 of the FRSA places a duty on the Commissioner to make provision for the purposes of extinguishing fires in its area and protecting life and property in the event of fires in its area.
- 6.4 In making provision, the Commissioner must, in particular, secure the provision of the personnel, services, and equipment necessary efficiently to meet all normal requirements (i.e., requirements for normal fire risks in their area) as regards protecting life and property, including during abnormal times. A similar duty is imposed upon the Commissioner in respect of rescuing people in the event of road traffic accidents in its area under s.8 FRSA. There is a broad operational discretion as to how to make the required provision.
- 6.5 The above duties are 'target duties'. In the case of such 'target duties' there is not an absolute standard that must be attained. There will not necessarily be a breach if there is just and reasonable excuse, which may be constituted by a temporary lack of provision on account of industrial action or other circumstances such as sickness caused by a pandemic. The grounds for non-provision must, however, objectively be considered to be 'compelling and reasonable'. Everything must be done that can reasonably be done to remedy the situation, including taking reasonable steps to provide cover, and making contingency plans that are reasonably reliable.
- 6.6 The Commissioner also has duties under the Civil Contingencies Act 2004 ("CCA") to carry out contingency planning for emergencies. In particular the Commissioner must assess the risk of an 'emergency' occurring (the definition of which includes an event or situation which threatens serious loss of human life/injury/homelessness/ damage to property) and maintain plans for the purpose of ensuring so far as reasonably practicable that if such an emergency (as defined above) occurs, the Commissioner is able to continue to perform its functions. These duties apply in relation to emergencies (as defined) if the emergency would be likely to seriously obstruct the Commissioner in the performance of its functions.
- 6.7 Additionally, when carrying out its functions, the Commissioner is required to have regard to the Fire and Rescue National Framework for England ("National Framework") prepared by the Secretary of State (FRSA, section 21). The National Framework states that:
- Fire and rescue authorities must have effective business continuity arrangements in place in accordance with their duties under the Civil Contingencies Act 2004. Within these arrangements, fire and rescue authorities must make every endeavour to meet the full range of service delivery risks and national resilience duties and commitments that they face.*
- 6.8 Although the above duties do not distinguish between life and property, life must be accorded a higher priority than property. The right to life under Article 2 of the European Human Rights Convention is absolute whereas property rights are qualified.
- 6.9 To fulfil these duties, including notably the requirements of the National Framework the Commissioner may enter into contractual arrangements with third parties. This report sets out the nature of those contractual arrangements. The procurement activity will be undertaken in accordance with the Public Contract Regulations (as amended), LFC's Scheme of Governance and the GLA group Responsible Procurement policy.
- 6.10 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. 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").

- 6.11 Paragraph 2.1(b) of Part 3 of the direction requires the prior approval of the Deputy Mayor for Fire shall be obtained before a decision is taken for a commitment to expenditure (capital or revenue) of £150,000 or above as identified in accordance with normal accounting practices.
- 6.12 This report will include a request to commit expenditure of over £150,000 and once the cost envelope is known, the Deputy Mayor's prior approval will be required. The cost envelope will be provided to the Finance and Investment Board to consider prior to this report progressing to the Commissioner and Deputy Mayor to take the decisions set out in this paper.
- 6.13 The Commissioner's Scheme of Governance reserves to the Commissioner the following decision-making powers: "To agree all matters that have a significant impact on the organisation or service delivery, as determined by a Director". Consequently, internal decision making on this report rests with the Commissioner.

## List of appendices

Appendix	Title	Open or confidential*
1	Equality Impact Assessment	

## 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:** YES

## 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?
Operational Contingency Arrangements (OCA) project

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

<b>High</b>		<b>Medium</b>	<b>Yes</b>	<b>Low</b>	
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2. Contact details	
Name of EIA author	Charlie Hanks
Department and Team	Operational Resilience
Date of EIA	11.08.22

3. Aim and Purpose	
What is the aim and purpose of the policy, project, decision, or activity?	The Project is for the re-tendering of the legally required operational contingency arrangements to cover periods of workforce disruption. The current contract is called EFCC and is provided by Securitas and the replacement must be in place by Nov 2023.
Who is affected by this work (all staff, specific department, wider communities?)	Predominantly members of the public as interface between LFC staff and Contractor is minimal. The primary area for concern is the same groups who have been identified as vulnerable to fire during normal business. These are identified below along with the justification for the paper to proceed and the available control measures.



LONDON FIRE BRIGADE

**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?

Project Board has been consulted and scrutinised the work every month since August 2021. PB is made up of senior representation from across Directorates and departments. Togetherness team have met with PM and Community Safety team have also assisted with data to highlight the parts of the community most exposed.

Community Safety team have been consulted with to make sure high risk characteristics are adequately considered as ultimately there will be an amplified risk across the board during periods which the contingency arrangements are operational. The consistent and underlying impact of OCA is with any group who are normally vulnerable to fire and so much of the data contained within this report is consistent with the EIA for community fire safety across London.

## 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>
<b>Age</b> (Younger, older, or age group)		<p>Data shows that individuals over the age of 50 are more vulnerable to fire and the effects of fire.</p> <p>The current (as at June 2021) HFSV booking page<sup>1</sup> does list age, specifically being over the age of 70 as one of the questions asked to people requesting a HFSV, to assess fire risk. This is because the data shows that older people are an increased risk of experiencing and being injured during a fire. This is due to their reduced ability to notice a fire, raise the alarm or escape quickly. Older people also have an increased chance of having one or more characteristics</p>	<a href="https://data.london.gov.uk/dataset/fire-facts--fire-deaths-in-greater-london/">https://data.london.gov.uk/dataset/fire-facts--fire-deaths-in-greater-london/</a>

<sup>1</sup>London Fire Brigade (Accessed June 2021), Assessing the risk, <https://www.london-fire.gov.uk/safety/the-home/home-fire-safety-visits/covid-19-and-home-fire-safety-visits-hfsvs/>

associated with an increased risk of experiencing an accidental fire in the home, such as dementia or significantly impaired mobility.

The below table<sup>2</sup> demonstrates that people in older age groups (65 and over) are overrepresented in fatal fires than people in younger age groups. The chart below has been formatted to show higher numbers of deaths in red, lower numbers in amber/yellow and the lowest in green to illustrate the afore mentioned association with age and increased risk of experiencing a fire.<sup>2</sup>

**Table 3: Fire deaths, by age, since 2010**

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Average distribution
	59	55	42	49	29	32	46	102	45	37	
00 to 01	-	-	-	-	-	-	-	2	-	-	0%
01 to 04	1	1	-	1	-	-	-	5	-	-	2%
05 to 09	-	2	-	-	-	-	-	4	1	-	1%
10 to 14	-	2	-	-	-	-	-	6	-	1	2%
15 to 19	-	-	-	1	-	-	-	2	-	1	1%
20 to 24	-	3	1	2	-	-	2	4	-	-	2%
25 to 29	1	3	-	2	1	1	1	8	-	-	3%
30 to 34	4	2	4	5	1	1	2	8	-	1	6%
35 to 39	2	3	1	2	3	1	1	4	4	2	5%
40 to 44	5	4	2	2	-	3	1	4	4	5	6%

<sup>2</sup> London Fire Brigade (2019) Fire Facts, Page 37, Table 3.2, <https://data.london.gov.uk/dataset/fire-facts--fire-deaths-in-greater-london/>

45 to 49	1	3	4	1	1	1	2	3	4	4		5%
50 to 54	5	3	4	5	1	5	5	5	2	5		8%
55 to 59	4	5	2	4	4	-	2	5	4	3		7%
60 to 64	8	3	2	2	3	1	4	11	2	3		8%
65 to 69	7	1	4	2	3	5	3	8	2	2		7%
70 to 74	5	2	3	5	2	3	8	8	4	1		8%
75 to 79	2	4	3	7	-	3	5	8	5	2		8%
80 to 84	7	5	6	3	3	3	3	4	9	1		9%
85 to 89	3	6	1	1	4	3	4	3	3	2		6%
90 plus	4	3	5	4	3	2	3	-	1	1		5%
Unknown	-	-	-	-	-	-	-	-	-	3		1%

**Justification**

*The Operational Contingency Arrangements (OCA) are necessary for the LFB to fulfil its statutory duty. The arrangements can only be provided through a private sector solution which is procured and this has a budgetary impact. The current level of resourcing has been identified as appropriate to the legal requirements and any increase in this would have further financial consequences which would have to be drawn from existing budgets which provide business as usual arrangements. It is therefore recommended that the current level of OCA are proportionate and offer the best value for money.*

**Control measures available**

	<p><i>It is recommended that this demographic are considered in the departmental products which will be reviewed and updated in light of the future arrangements. These products are focused on risk mitigation for London in the event the contingency arrangements are required.</i></p>																																											
<p><b>Disability</b> (Physical, sensory, mental health, learning disability, long term illness, hidden)</p>	<p><i>Data shows that individuals who are disabled and suffer impaired eye sight, hearing or mobility are more vulnerable to fire and the effects of fire.</i></p> <p><i>People with disabilities have an increased risk of experiencing a fire, due to similar reasons to older people. Disabilities, whether physical or psychological will reduce a person's ability to notice a fire, raise the alarm and/or escape. Home Fire safety visits aim to provide guidance and where appropriate interventions (such as smoke alarms), to mitigate the risk of people experiencing a fire which might result in injury or death.</i></p> <p><i>The below table<sup>3</sup> shows the prevalence of disability, in London, by age group and disability type. This table was generated by the GLA Transport Committee in 2010. This dataset this table is drawn from is the most comprehensive report of differentiated disability types for London available. It is the basis for the "Accessibility of the transport network 2010" report which makes predictions about disability prevalence in London until 2031.</i></p> <p><b>Table 4: Prevalence of disability, in London, by age group and disability type (2010)</b></p> <table border="1" data-bbox="501 906 1617 1158"> <thead> <tr> <th></th> <th>05-16</th> <th>17-24</th> <th>25-44</th> <th>45-59</th> <th>60+</th> </tr> </thead> <tbody> <tr> <td><b>01 None</b></td> <td>1,060,150</td> <td>712,930</td> <td>2,595,597</td> <td>1,126,821</td> <td>869,323</td> </tr> <tr> <td><b>02 Wheelchair user</b></td> <td>3,816</td> <td>706</td> <td>8,272</td> <td>9,954</td> <td>62,647</td> </tr> <tr> <td><b>03 Mobility</b></td> <td>2,873</td> <td>2,189</td> <td>34,212</td> <td>61,407</td> <td>216,496</td> </tr> <tr> <td><b>04 Visual</b></td> <td>652</td> <td>0</td> <td>4,227</td> <td>4,855</td> <td>17,892</td> </tr> <tr> <td><b>05 Hearing</b></td> <td>2,445</td> <td>0</td> <td>5,296</td> <td>5,537</td> <td>13,140</td> </tr> <tr> <td><b>06 Learning</b></td> <td>8,491</td> <td>4,057</td> <td>7,183</td> <td>2,286</td> <td>1,142</td> </tr> </tbody> </table> <p><i>The Brigade delivered 80,559 HFSVs in 2014 to a diverse range of people and housing tenure types. HFSVs are likely to be delivered to people with disabilities, as they would be deemed</i></p>		05-16	17-24	25-44	45-59	60+	<b>01 None</b>	1,060,150	712,930	2,595,597	1,126,821	869,323	<b>02 Wheelchair user</b>	3,816	706	8,272	9,954	62,647	<b>03 Mobility</b>	2,873	2,189	34,212	61,407	216,496	<b>04 Visual</b>	652	0	4,227	4,855	17,892	<b>05 Hearing</b>	2,445	0	5,296	5,537	13,140	<b>06 Learning</b>	8,491	4,057	7,183	2,286	1,142	<p><a href="https://data.london.gov.uk/dataset/londoners-reduced-mobility">https://data.london.gov.uk/dataset/londoners-reduced-mobility</a></p> <p><a href="https://www.nationalfirechiefs.org.uk/News/nfcc-warns-of-fire-risk-when-using-emollients">https://www.nationalfirechiefs.org.uk/News/nfcc-warns-of-fire-risk-when-using-emollients</a></p>
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<sup>3</sup> GLA (2010), <https://data.london.gov.uk/dataset/londoners-reduced-mobility>



high risk individuals. The table below<sup>5</sup> shows the diversity of disability types and tenure types, in the UK. Although not all of the disability types are linked directly to fire risk, it is important to have an awareness of the range of disability types for people, staff delivering HFSVs will encounter, when developing the TCAP specification.

Although some of the disability types may not seem relevant to home fire safety, such as skin conditions, they link to behaviours and environmental factor that can increase fire risk such as the use of flammable emollient products<sup>6</sup>. Chris Bell, NFCC's Emollient Lead, said: "If you use an emollient skin product, or care for somebody who does, stay away or be extra careful when near to naked flames or potential ignition sources, for example, lighting a cigarette. People need to be aware that washing does not remove the risk"<sup>7</sup>

**Table 5: Housing situation of disabled people aged 16 to 64 by main impairment type (UK, 6 months ending June 2020)**

		Estimate (%)	Unweighted sample
<b>Problems or disabilities connected with arms or hands</b>	Owner occupier	54.9	522
	Social rented housing	23.9	189
	Private rented housing	13.6	98
	Living with parents	4.2	28
	Other	3.4	21
<b>Problems or disabilities connected with legs or feet</b>	Owner occupier	53.8	712
	Social rented housing	25.1	278
	Private rented housing	11.6	114
	Living with parents	6.0	57

<sup>5</sup> ONS (Accessed June 2021), Disability and housing, <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/datasets/disabilityandhousinguk>

<sup>6</sup> National Fire Chiefs Council (accessed June 2021), <https://www.nationalfirechiefs.org.uk/News/nfcc-warns-of-fire-risk-when-using-emollients>

		Other	3.4	33	
	<b>Problems or disabilities connected with Back or neck</b>	Owner occupier	48.0	843	
		Social rented housing	25.8	333	
		Private rented housing	16.6	219	
		Living with parents	6.5	72	
		Other	3.1	39	
		<b>Difficulty in seeing</b>	Owner occupier	41.9	71
	Social rented housing		29.9	32	
	Private rented housing		11.6	14	
	Living with parents		13.3	12	
	Other		3.3	5	
	<b>Difficulty in hearing</b>	Owner occupier	47.8	58	
		Social rented housing	14.7	13	
		Private rented housing	..	..	
		Living with parents	23.6	19	
		Other	..	..	
	<b>Severe disfigurements, skin conditions, allergies</b>	Owner occupier	37.3	62	
		Social rented housing	10.2	16	
		Private rented housing	20.4	23	
		Living with parents	30.2	36	
		Other	2.0	4	
	<b>Chest or breathing problems, asthma, bronchitis</b>	Owner occupier	44.0	436	
		Social rented housing	28.6	229	
		Private rented housing	12.4	95	

		Living with parents	12.6	87
		Other	2.4	21
<b>Heart, blood pressure or blood circulation problems</b>	Owner occupier	50.9	398	
	Social rented housing	24.6	163	
	Private rented housing	14.2	75	
	Living with parents	7.9	35	
	Other	2.5	18	
<b>Stomach, liver, kidney or digestion problems</b>	Owner occupier	47.4	332	
	Social rented housing	21.7	118	
	Private rented housing	12.3	65	
	Living with parents	14.1	74	
	Other	4.4	23	
<b>Diabetes</b>	Owner occupier	38.2	203	
	Social rented housing	28.6	91	
	Private rented housing	19.3	53	
	Living with parents	9.2	37	
	Other	4.7	14	
<b>Depression, bad nerves or anxiety</b>	Owner occupier	27.8	765	
	Social rented housing	26.3	576	
	Private rented housing	20.8	426	
	Living with parents	19.9	371	
	Other	5.1	88	
<b>Epilepsy</b>	Owner occupier	25.0	47	
	Social rented housing	34.2	41	

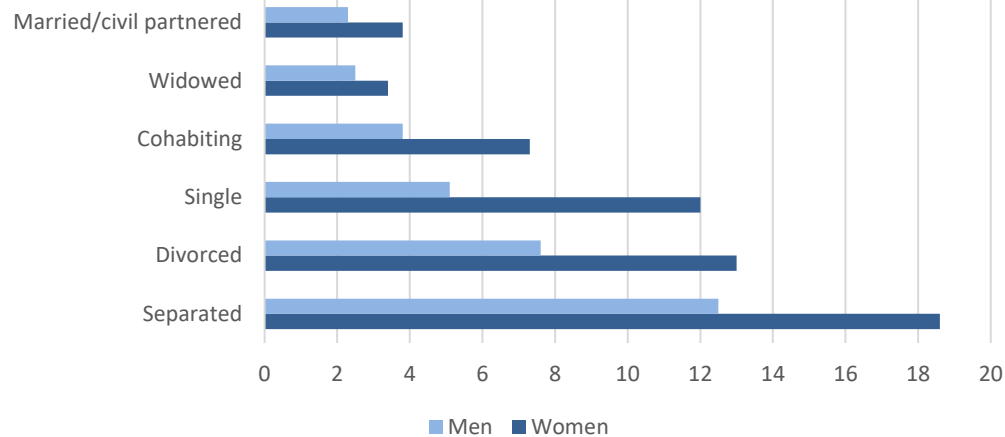
		Private rented housing	..	..
		Living with parents	24.0	32
		Other	..	..
	<b>Autism</b>	Owner occupier	4.7	8
		Social rented housing	7.8	13
		Private rented housing	11.5	18
		Living with parents	74.5	154
		Other	1.6	6
	<b>Severe or specific learning difficulties</b>	Owner occupier	9.7	25
		Social rented housing	10.2	24
		Private rented housing	3.5	7
		Living with parents	67.1	122
		Other	9.5	21
	<b>Mental illness or other nervous disorders</b>	Owner occupier	18.5	150
		Social rented housing	35.7	255
		Private rented housing	17.7	115
		Living with parents	24.5	164
		Other	3.6	26
	<b>Progressive illness n.e.c.</b>	Owner occupier	48.9	390
		Social rented housing	27.0	161
		Private rented housing	12.6	69
		Living with parents	10.6	54
		Other	1.0	10
		Owner occupier	44.0	879

		<table border="1"> <tr> <td data-bbox="497 199 882 400" rowspan="4"><b>Other problems, disabilities</b></td> <td data-bbox="882 199 1160 264">Social rented housing</td> <td data-bbox="1160 199 1364 264">22.4</td> <td data-bbox="1364 199 1563 264">327</td> </tr> <tr> <td data-bbox="882 264 1160 330">Private rented housing</td> <td data-bbox="1160 264 1364 330">13.1</td> <td data-bbox="1364 264 1563 330">197</td> </tr> <tr> <td data-bbox="882 330 1160 363">Living with parents</td> <td data-bbox="1160 330 1364 363">16.9</td> <td data-bbox="1364 330 1563 363">234</td> </tr> <tr> <td data-bbox="882 363 1160 400">Other</td> <td data-bbox="1160 363 1364 400">3.6</td> <td data-bbox="1364 363 1563 400">49</td> </tr> </table> <p data-bbox="497 475 658 502"><b>Justification</b></p> <p data-bbox="497 544 1608 772"><i>The Operational Contingency Arrangements (OCA) are necessary for the LFB to fulfil its statutory duty. The arrangements can only be provided through a private sector solution which is procured and this has a budgetary impact. The current level of resourcing has been identified as appropriate to the legal requirements and any increase in this would have further financial consequences which would have to be drawn from existing budgets which provide business as usual arrangements. It is therefore recommended that the current level of OCA are proportionate and offer the best value for money.</i></p> <p data-bbox="497 815 853 842"><b>Control measures available</b></p> <p data-bbox="497 884 1585 979"><i>It is recommended that this demographic are considered in the departmental products which will be reviewed and updated in light of the future arrangements. These products are focused on risk mitigation for London in the event the contingency arrangements are required.</i></p>	<b>Other problems, disabilities</b>	Social rented housing	22.4	327	Private rented housing	13.1	197	Living with parents	16.9	234	Other	3.6	49		
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<p data-bbox="199 1019 353 1310"><b>Gender reassignment</b> (Someone proposing to/undergoing/undergone a transition)</p>	<p data-bbox="376 1019 479 1078">Adverse</p>	<p data-bbox="497 1019 1615 1283"><i>Although there is no publicly available data that shows a clear link between transphobic offences and fire risk, there are individual media reports showing that fire has historically been used as a weapon in homophobic attacks, in private dwellings<sup>8</sup>. It would be reasonable to conclude that trans people might be at an increased risk of hate crime related arson attacks, compared to non-trans people. The Brigade do provide guidance and fire arson reduction letterboxes for people at a high risk of experiencing arson attacks, where appropriate, as part of HFSVs. As well as smoke alarms where appropriate, which could provide early warning during a domestic arson attack. Writing a TCAP specification that has due regard for groups of people</i></p>	<p data-bbox="1639 1019 2024 1147"><a href="https://www.pinknews.co.uk/2020/02/18/man-jailed-arson-fire-transgender-hate-crime-attack/">https://www.pinknews.co.uk/2020/02/18/man-jailed-arson-fire-transgender-hate-crime-attack/</a></p>														

<sup>8</sup> Pink News (2020), Nick Duffy, <https://www.pinknews.co.uk/2020/02/18/man-jailed-arson-fire-transgender-hate-crime-attack/>

<p>from one gender to another)</p>		<p><i>who are likely to experience violent hate crime such as trans people; and how to provide them with the necessary interventions is likely to have a positive impact on trans people.</i></p>	
<p><b>Marriage / Civil Partnerships</b> (Married as well as same-sex couples)</p>		<p><i>Although there is no publically available could be found that shows a clear link between marital status offences and fire risk in the UK, It would be reasonable to conclude that based on the Crime Survey for England and Wales data, that people belonging to certain marital status groups might be at an increased risk of arson attacks, compared to other groups. Specifically, the evidence shows that separated and divorces individuals had the highest rates of domestic abuse.</i></p> <p><i>Many of the request for arson reduction letterboxes come from partner agencies, referring people who have received threats of, or recently experienced arson. The source of the threat is often cited as a partner or ex-partner. As part of the HFSV delivered to people at risk of domestic abuse related arson threat, smoke alarms may be fitted where appropriate, which could provide early warning during a domestic arson attack. Writing a TCAP specification that has due regard for how to engage with groups of people who are likely to experience this type of attack; as well as provide them with the appropriate interventions would likely have a positive impact for people in certain marital status groups.</i></p> <p><i>The below graph shows this association between marital status and experience of domestic abuse.</i></p>	

**Prevalence of domestic abuse in the last year for adults aged 16 to 74 years, by marital status and sex, England and Wales, year ending March 2020**



**Justification**

*The Operational Contingency Arrangements (OCA) are necessary for the LFB to fulfil its statutory duty. The arrangements can only be provided through a private sector solution which is procured and this has a budgetary impact. The current level of resourcing has been identified as appropriate to the legal requirements and any increase in this would have further financial consequences which would have to be drawn from existing budgets which provide business as usual arrangements. It is therefore recommended that the current level of OCA are proportionate and offer the best value for money.*

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<b>Pregnancy and Maternity</b>		<i>There is no published data that demonstrates a clear link between fire risk, pregnancy and maternity status. Nor is it always the case that said people will exhibit physical or mental issues</i>	n.a																																																																																																																																															
<b>Race</b> (including nationality, colour, national and/or ethnic origins)		<p><i>In terms of fire risk white people (who make up 86% of the population<sup>9</sup>) are consistently disproportionately at a higher risk of dying in a fire. The reason for this is uncertain.</i></p> <p><b>Table 8 : Ethnicity of victim (Fire related deaths), from 2010</b></p> <table border="1"> <thead> <tr> <th></th> <th>2010</th> <th>2011</th> <th>2012</th> <th>2013</th> <th>2014</th> <th>2015</th> <th>2016</th> <th>2017</th> <th>2018</th> <th>2019</th> </tr> </thead> <tbody> <tr> <td></td> <td><b>59</b></td> <td><b>55</b></td> <td><b>42</b></td> <td><b>49</b></td> <td><b>29</b></td> <td><b>32</b></td> <td><b>46</b></td> <td><b>102</b></td> <td><b>45</b></td> <td><b>37</b></td> </tr> <tr> <td>Arab*</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>1</td> <td>-</td> <td>2</td> <td>-</td> <td>-</td> </tr> <tr> <td>Bangladeshi</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>Black African</td> <td>4</td> <td>1</td> <td>-</td> <td>1</td> <td>1</td> <td>-</td> <td>-</td> <td>1</td> <td>5</td> <td>1</td> </tr> <tr> <td>Black Caribbean</td> <td>1</td> <td>2</td> <td>4</td> <td>4</td> <td>2</td> <td>6</td> <td>4</td> <td>-</td> <td>4</td> <td>3</td> </tr> <tr> <td>Black Other</td> <td>1</td> <td>1</td> <td>1</td> <td>-</td> <td>2</td> <td>1</td> <td>1</td> <td>1</td> <td>1</td> <td>2</td> </tr> <tr> <td>Chinese</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>1</td> <td>-</td> <td>-</td> </tr> <tr> <td>Indian</td> <td>2</td> <td>5</td> <td>-</td> <td>1</td> <td>2</td> <td>2</td> <td>3</td> <td>-</td> <td>3</td> <td>2</td> </tr> <tr> <td>Latin American*</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>Other</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>1</td> <td>1</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>Other Asian</td> <td>4</td> <td>14</td> <td>2</td> <td>6</td> <td>2</td> <td>3</td> <td>6</td> <td>4</td> <td>1</td> <td>5</td> </tr> <tr> <td>Pakistani</td> <td>-</td> <td>1</td> <td>-</td> <td>1</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>1</td> </tr> </tbody> </table>		2010	2011	2012	2013	2014	2015	2016	2017	2018	2019		<b>59</b>	<b>55</b>	<b>42</b>	<b>49</b>	<b>29</b>	<b>32</b>	<b>46</b>	<b>102</b>	<b>45</b>	<b>37</b>	Arab*	-	-	-	-	-	1	-	2	-	-	Bangladeshi	-	-	-	-	-	-	-	-	-	-	Black African	4	1	-	1	1	-	-	1	5	1	Black Caribbean	1	2	4	4	2	6	4	-	4	3	Black Other	1	1	1	-	2	1	1	1	1	2	Chinese	-	-	-	-	-	-	-	1	-	-	Indian	2	5	-	1	2	2	3	-	3	2	Latin American*	-	-	-	-	-	-	-	-	-	-	Other	-	-	-	-	-	1	1	-	-	-	Other Asian	4	14	2	6	2	3	6	4	1	5	Pakistani	-	1	-	1	-	-	-	-	-	1	
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		White	43	28	34	33	19	18	30	22	28	12	
		White - Gypsy or Irish Traveller	-	-	-	-	-	-	-	-	-	-	
		Not recorded	4	3	1	3	1	-	1	71	3	11	
<b>Religion or Belief</b> (people of any religion, or no religion, or people who follow a particular belief (not political))		<p><b>Known Fire Risk Associated with Particular Religions or Beliefs</b></p> <p><i>It is recognised that in many religions or as part of the expression of personal beliefs, flammable paraphernalia such as incense sticks (such as Hindu Agarbatti) or candles (such as the Hanukkah menorah)<sup>10</sup>. Advice is currently given by Brigade staff covering the fire risk associated with candles and incense.</i></p> <p><i>Although illegal in the UK, believers of some religious and belief systems (such as Rastafarianism) engage personal use of cannabis. Cannabis use involves the use of matches and lighters, which can, along with the rolled cannabis, be an ignition source. Cannabis smoking has similar risk factors to tobacco smoking and should be considered for inclusion in the section of the training covering smoking.</i></p> <p><i>London's diverse religious and belief groups are spread across the capital. However some London boroughs have a higher number of people of a particular group than others. This is something that should be taken into consideration when planning HFSVS, as different groups have different customs and associated fire risks. Awareness of these differences and how they may vary depending on borough should be taken into account.</i></p> <p><b>Table 9: Population by Religion, London Borough<sup>11</sup></b></p>											<a href="https://data.london.gov.uk/dataset/percentage-population-religion-borough">https://data.london.gov.uk/dataset/percentage-population-religion-borough</a>

<sup>10</sup> NFCC (2008), Religion, Belief and Culture in our Community, Page 33,

[https://www.nationalfirechiefs.org.uk/write/MediaUploads/NFCC%20Guidance%20publications/Workforce/Equality/Faithguide\\_National\\_FINAL.pdf](https://www.nationalfirechiefs.org.uk/write/MediaUploads/NFCC%20Guidance%20publications/Workforce/Equality/Faithguide_National_FINAL.pdf)

<sup>11</sup> ONS (2011), 2011 Census, Population by Religion, Borough, <https://data.london.gov.uk/dataset/percentage-population-religion-borough>

Area	Christi an	Budd hist	Hind u	Jewi sh	Musli m	Sik h	Other religio n	No religi on	Religio n not stated
Barking and Dagenham	104,101	842	4,464	425	25,520	2,952	533	35,106	11,968
Barnet	146,866	4,521	21,924	54,084	36,744	1,269	3,764	57,297	29,917
Bexley	144,093	1,377	3,547	234	5,645	4,156	724	55,995	16,226
Brent	129,080	4,300	55,449	4,357	58,036	1,709	3,768	33,054	21,462
Bromley	*187,656	1,580	4,987	957	7,841	736	1,138	80,303	24,194
Camden	84,737.3	3,154.7	3,591.5	11,226.3	30,384.6	518.6	1,423.2	64,064.5	21,237.4
City of London	3,344	92	145	166	409	18	28	2,522	651
Croydon	205,022	2,381	21,739	709	29,513	1,450	2,153	72,654	27,757
Ealing	148,055	4,228	28,915	1,131	53,198	26,778	1,987	50,848	23,309
Enfield	167,417	1,824	10,927	4,412	52,141	1,078	1,950	48,522	24,195
Greenwich	134,632	4,223	9,087	492	17,349	3,490	1,013	65,034	19,237
Hackney	95,131	3,075	1,577	15,477	34,727	1,872	1,311	69,454	23,646
Hammersmith and Fulham	98,808	2,060	2,097	1,161	18,242	442	857	43,487	15,339
Haringey	114,659	2,829	4,539	7,643	36,130	808	1,303	64,202	22,813
Harrow	89,181	2,700	60,407	10,538	29,881	2,752	5,945	22,871	14,781
Havering	155,597	760	2,963	1,159	4,829	1,928	648	53,549	15,799



LONDON FIRE BRIGADE

Hillingdon	134,81 3	2,386	22,0 33	1,753	29,06 5	18,2 30	1,669	46,49 2	17,495
Hounslow	106,66 0	3,617	26,2 61	651	35,66 6	22,7 49	1,540	40,35 1	16,462
Islington	90,107 .3	2,298. 8	2,30 6.9	2,089 .6	21,47 0.2	625. 5	1,052.0	67,97 3.5	18,201. 2
Kensington and Chelsea	86,005	2,447	1,38 6	3,320	15,81 2	263	778	32,66 9	15,969
Kingston upon Thames	84,684	1,771	7,50 2	775	9,474	1,23 6	802	41,18 3	12,633
Lambeth	160,94 4	2,963	3,11 9	1,134	21,50 0	440	1,682	84,80 3	26,501
Lewisham	145,58 8	3,664	6,56 2	643	17,75 9	531	1,478	75,15 5	24,505
Merton	111,99 3	1,884	12,2 03	791	16,26 2	498	810	41,23 1	14,021
Newham	123,11 9	2,446	26,9 62	342	98,45 6	6,42 1	1,090	29,37 3	19,775
Redbridge	102,75 5	1,840	31,6 99	10,21 3	64,99 9	17,3 77	1,348	30,69 1	18,048
Richmond upon Thames	103,31 9	1,577	3,05 1	1,409	6,128	1,58 1	890	53,19 5	15,840
Southwark	151,46 2	3,884	3,66 8	1,006	24,55 1	653	1,350	77,09 8	24,611
Sutton	111,08 6	1,368	8,03 8	486	7,726	325	796	46,81 7	13,504
Tower Hamlets	75,087 .1	2,994. 4	4,71 7.4	1,396 .2	96,15 6.7	911. 9	908.2	54,36 3.4	17,560. 4
Waltham Forest	124,93 9	1,987	5,91 7	1,259	56,54 1	1,20 9	993	46,46 2	18,942
Wandswort h	162,59 0	2,574	6,49 6	1,617	24,74 6	832	1,283	82,74 0	24,117
Westminste r	97,877	3,194	4,17 8	7,237	40,07 3	496	1,280	44,54 2	20,519

<p><b>Sex</b> (Men and women)</p>	<p><i>This will not adversely affect any group more than another. The contingency arrangements are for pan-London operational cover.</i></p>	<p><b>na</b></p>																																			
<p><b>Sexual Orientation</b> (straight, bi, gay, and lesbian people)</p>	<p><i>A recent Met Police freedom of information request revealed that there has been a significant increase in the number of total homophobic offences between 2017/2018 to 2019/20<sup>12</sup>. These incidents were not broken down into type (for example arson, physical assault etc).</i></p> <p><b>Table 12: Homophobic Offences with Outcome Description and recorded date set between 01/04/2017 and 31/03/2020</b></p> <table border="1" data-bbox="506 533 1630 839"> <thead> <tr> <th>Outcome</th> <th>FY 2017/2018</th> <th>FY 2018/2019</th> <th>FY 2019/2020</th> <th>MPS</th> </tr> </thead> <tbody> <tr> <td>Caution - adult</td> <td>23</td> <td>12</td> <td>17</td> <td></td> </tr> <tr> <td>Caution - youth</td> <td>1</td> <td>0</td> <td>2</td> <td></td> </tr> <tr> <td>Charged/Summoned</td> <td>242</td> <td>182</td> <td>180</td> <td></td> </tr> <tr> <td>Outcome Pending</td> <td>1</td> <td>2</td> <td>80</td> <td></td> </tr> <tr> <td>Other Outcomes</td> <td>1,813</td> <td>2,175</td> <td>2,739</td> <td>6</td> </tr> <tr> <td><b>MPS Total</b></td> <td><b>2,080</b></td> <td><b>2,371</b></td> <td><b>3,018</b></td> <td><b>7</b></td> </tr> </tbody> </table> <p><i>Although there is no publically available data that shows a clear link between homophobic offences and fire risk, there are individual media reports showing that fire has historically been used as a weapon in homophobic attacks, in private dwellings<sup>13</sup>. It would be reasonable to conclude that bi, gay and lesbian people might be at an increased risk of hate crime related arson attacks, compared to straight people. The Brigade do provide guidance and fire arson reduction letterboxes for people at a high risk of experiencing arson attacks, where appropriate, as part of HFSVs. As well as smoke alarms where appropriate, which could provide early warning during a domestic arson attack.</i></p>	Outcome	FY 2017/2018	FY 2018/2019	FY 2019/2020	MPS	Caution - adult	23	12	17		Caution - youth	1	0	2		Charged/Summoned	242	182	180		Outcome Pending	1	2	80		Other Outcomes	1,813	2,175	2,739	6	<b>MPS Total</b>	<b>2,080</b>	<b>2,371</b>	<b>3,018</b>	<b>7</b>	<p><a href="https://www.met.police.uk/SysSiteAssets/foi-media/metropolitan-police/disclosure_2020/july_2020/information-rights-unit---hate-crime-against-people-who-identify-as-transgender-or-based-on-sexual-orientation-from-april-2017-to-march-2020">https://www.met.police.uk/SysSiteAssets/foi-media/metropolitan-police/disclosure_2020/july_2020/information-rights-unit---hate-crime-against-people-who-identify-as-transgender-or-based-on-sexual-orientation-from-april-2017-to-march-2020</a></p>
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<sup>12</sup> Met Police (2020), FOI Reference Number: Reference No: 01.FOI.20.014700, Table 1, [https://www.met.police.uk/SysSiteAssets/foi-media/metropolitan-police/disclosure\\_2020/july\\_2020/information-rights-unit---hate-crime-against-people-who-identify-as-transgender-or-based-on-sexual-orientation-from-april-2017-to-march-2020](https://www.met.police.uk/SysSiteAssets/foi-media/metropolitan-police/disclosure_2020/july_2020/information-rights-unit---hate-crime-against-people-who-identify-as-transgender-or-based-on-sexual-orientation-from-april-2017-to-march-2020)

<sup>13</sup> This is Local London (2008), Staff Reporter, <https://www.thisislocallondon.co.uk/news/2058929.homophobic-arson-attack-victim-tells-of-his-pain/>

	<p><b>Justification</b></p> <p><i>The Operational Contingency Arrangements (OCA) are necessary for the LFB to fulfil its statutory duty. The arrangements can only be provided through a private sector solution which is procured and this has a budgetary impact. The current level of resourcing has been identified as appropriate to the legal requirements and any increase in this would have further financial consequences which would have to be drawn from existing budgets which provide business as usual arrangements. It is therefore recommended that the current level of OCA are proportionate and offer the best value for money.</i></p> <p><b>Control measures available</b></p> <p><i>It is recommended that this demographic are considered in the departmental products which will be reviewed and updated in light of the future arrangements. These products are focused on risk mitigation for London in the event the contingency arrangements are required.</i></p>	
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<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.
<i>There is the potential for a negative impact for non-binary people, who may experience hate crime in the form of arson, due to their sexual orientation or gender-reassignment status.</i>
<i>Negative impact for high fire risk individuals. This includes people: who have a reduced ability to respond to an alarm or fire, escape in the event of a fire occurring or who have Characteristics associated with an increased risk of experiencing an accidental fire in the home.</i>

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

<p><b>Eliminate discrimination?</b></p>	<p><i>There are no opportunities currently identified through having a reduced level of operational cover although through departmental products the possibility of such arrangements being put in place will provide a platform for positive messaging and risk reduction advice to be provided to the general public.</i></p>
<p><b>Advance equality of opportunity between different groups?</b></p>	<p><i>There are no opportunities currently identified through having a reduced level of operational cover although through departmental products the possibility of such arrangements being put in place will provide a platform for positive messaging and risk reduction advice to be provided to the general public.</i></p>
<p><b>Foster good relations between different groups?</b></p>	<p><i>There are no opportunities currently identified through having a reduced level of operational cover although through departmental products the possibility of such arrangements being put in place will provide a platform for positive messaging and risk reduction advice to be provided to the general public.</i></p>

<p><b>8. Mitigating and justifying impacts</b></p>		
<p>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>?</p>		
<p><b>Characteristic with potential adverse impact (e.g., age, disability)</b></p>	<p><b>Action being taken to mitigate or justify</b></p>	<p><b>Lead person responsible for action</b></p>
<p>All adversely affected characteristics.</p>	<p><i>It is recommended that these groups are considered in the departmental products which will be reviewed and updated in light of the future arrangements. These products are focused on risk mitigation for London in the event the contingency arrangements are required.</i></p>	<p>Community Safety department under guidance of OCA work-stream lead, GC Chris Drew.</p>

**Now complete the RAG rating at the top of page 1:**



LONDON FIRE BRIGADE

**High:** because 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:** because 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:** because 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: