

Transport Training

Report to:

Service Delivery Board
Commissioner's Board
London Fire Commissioner

Date:

21 August 2024
11 September 2024

Report by:

Assistant Commissioner for Learning and Professional Development, Keeley Foster

Report classification:

For decision

For publication

I agree the recommended decision below.



Andy Roe
London Fire Commissioner

**This decision was remotely
Date signed on 19 September 2024**

PART ONE

Non-confidential facts and advice to the decision-maker

Executive Summary

This report outlines a strategy to upscale driver training at London Fire Brigade (LFB). The strategy considers capacity, throughput, development, and revalidation/license to operate (L2O) for driver training. It will also safeguard future driver training demands in LFB and ensure driving establishment requirements are maintained. In doing so, all relevant staff will have the appropriate knowledge and skills to effectively carry out their driving responsibilities safely, whilst also providing corporate assurance.

Recommended decisions

For the London Fire Commissioner

That the London Fire Commissioner:

1. Delegates authority to the Assistant Commissioner for Learning and Professional Development to enter into a Memorandum of Understanding (MOU) with Babcock Training Limited (Babcock) as set out in this report and to make minor amendments to the MOU attached to this report as required.
2. Delegates authority to the Assistant Commissioner for Learning and Professional Development to amend the Babcock training contract, following consultation with General Counsel and Procurement, as required to effect the MOU
3. Delegates authority to the Assistant Commissioner for Learning and Professional Development to make any amendments to policy, that do not increase costs to the London Fire Commissioner, to effect the secondment of London Fire Commissioner employees to Babcock as set out in this report. No secondment is to occur without the agreement of Assistant Commissioner for Fire stations.
4. Delegates authority to Assistant Commissioner for Learning and Professional Development to set up and operate the assurance framework set out in this report.
5. Notes that the Assistant Commissioner for Learning and Professional Development has authority to re-organise their department in line with approved budgets and staffing numbers.

1 Introduction and background

1.1 In LFB, all firefighters (FFs) are now contractually required to become fire appliance drivers (Motor Drivers - MDs) as part of their development. They must have obtained their Large Goods Vehicle (LGV) provisional license by the time of their end point assessment, notwithstanding any reasonable adjustments. The current required establishment for MDs within London Fire Brigade is 1,956, out of which 1,563 are currently trained. This means there is currently a skills gap of 393 MDs. This report sets out a clear pathway and the

required support functions to close the skills gap.

1.2 Achieving the recommendations in this report requires multiple key stakeholders to support closing the skills gap, including functions outside of Learning and Professional Development.

1.3 The process for becoming an MD is as follows. The delegate must:

- apply for the LGV qualification via the Driving Vehicle Standards Agency (DVSA)
- take and pass an LGV medical with a recognised provider.
- complete an LGV theory test with a recognised provider.
- attend a 5-day practical LGV course (delivered by Babcock Training Limited (Babcock)).

This must be done within two years of completing the theory test.

1.4 Once a delegate has obtained their LGV license, they must complete a Driver Development Module (DDM). This consists of twenty daytime drives and ten nighttime drives over a minimum of six months in normal driving conditions as part of their daily routines.

1.5 The delegate will then be eligible to attend an Emergency Fire Appliance Driving course (EFAD). This eight-day course trains the driver to respond on blue lights. There is a pre-course learning requirement for this course. Once they have successfully completed the course, they are available to be fire appliance drivers.

1.6 As of May 2024, LFB has 1,563 staff on fire stations qualified as EFAD: capable of responding under blue light conditions.

1.7 There are currently 81 LGV-qualified drivers who are available for EFAD courses. There are 789 FFs eligible to become MD who have not obtained their LGV license. This excludes those employed prior to 1 April 2004 and therefore not contractually required to drive.

1.8 This means that there is a pool of 789 FF's who are available to become appliance drivers. However, they cannot do so quickly because of restrictions at various points in the process, which are explained below.

2 Restrictions on LGV driver throughput

2.1 There are restrictions in getting the 789 eligible FF's ready to attend the EFAD courses because of delays in obtaining the LGV license.

2.2 LFB recruit a significant amount of people who then need to become LGV drivers. Over the next three years this is forecast to be 280 per year.

2.3 As explained in 1.3 above, to access the LGV courses (delivered by Babcock) delegates need to have:

- LGV application
- medical
- theory test.

2.4 LFB's training provider, Babcock, have sufficient capacity to deliver the required volume of LGV courses. However, restrictions are created due to difficulties in FF's gaining the required pre-requisites for this course for the following reasons:

- staff find it difficult to complete the LGV application: the DVSA process is complex, and delegates often need assistance.
- there is no formal booking process for LGV medicals. This means LFB is reliant on individuals contacting Occupational Health to book onto medicals rather than LFB organising and prioritising based on operational need.
- individual delegates book their own theory tests. This means they apply with the general

public, creating issues in obtaining a timely LGV theory test. If LFB facilitated the booking process, staff would be prioritised over the general public because they are an emergency service. It would also gain access to centres across the UK.

- 2.5 There is also a challenge with the vehicles Babcock use to deliver LGV courses. Currently they use four Mk II fire appliances. These are legacy vehicles which do not meet the Mayor of London's emission targets and will be decommissioned in October 2025 in line with the Mayor's strategic priorities.
- 2.6 These older vehicles not only incur significant maintenance expenses but also exhibit reliability issues. Although breakdowns have not yet led to the cancellation of any courses, there is a considerable risk that future courses could be impacted. Such incidents could severely undermine the confidence of course participants. Consequently, there is a requirement for a plan to replace these vehicles.

3 EFAD Instructors

- 3.1 When a delegate qualifies for EFAD, they are enrolled by LFB on a training program conducted by Babcock. The instructors for these courses must have advanced driving certifications, making them highly skilled and sought after throughout the UK. Additionally, there is a nationwide shortage of LGV instructors, which further delays the development process.
- 3.2 Babcock have staff with LGV instructor qualifications who could train as Emergency Response Driving (EFAD) Instructors. However, under the current system this is challenging for Babcock because they are an independent training provider not a fire and rescue service. They are not able to utilise road traffic exemptions without a member of LFB staff in the vehicle because there is no formal agreement between the LFC and Babcock in place to do this. This would be a basic requirement for Babcock to develop their own instructor course.
- 3.3 Currently LFB cannot provide a large number of delegates to Babcock for LGV courses (for the reasons highlighted in 2.4 above). Therefore, whereas in the long-term relying on LGV instructors for EFAD training may decrease the availability of LGV training slots (essentially sacrificing one priority for another), currently there is a window to increase trainer availability.
- 3.4 Looking to the medium to long term, it will be necessary for LFB, in partnership with Babcock, to identify individuals who can be trained as EFAD instructors. LGV blue light trained staff currently working within LFB represent an efficient pool from which to take prospective candidates for EFAD instruction because they already have the foundation skills.

4 Recommendations

- 4.1 To resolve the LGV bottleneck, it is recommended that an FRS(C) administrator is recruited, who will:
 - in liaison with Station and Borough Commanders, facilitate regular application workshops at station or regional hubs to ensure timely applications for LGV.
 - administer LGV medical bookings in liaison with individuals and line managers. The LGV medical is currently booked by the delegate through their GP and the cost reimbursed by the LFB. LGV medicals cannot be completed as part of the pre-employment process.
 - administer theory test bookings on behalf of individuals. This means that the tests are booked by LFB, giving individuals priority over the general public.
- 4.2 Replacing the current 4 Mk II fire appliances with specialised white goods vehicles equipped with blue light systems and adjusted weight to mimic the response of fire appliances is a more cost-effective, versatile, environmentally friendly, scalable solution that is also quicker to procure, offering access to a broader market.

4.3 Currently no budget has been identified for this recommendation, and it could be met in a variety of ways (leasing vehicles, purchasing vehicles). Therefore, it is recommended that a robust business case is created in partnership with Procurement and FLEET, and consulted via Change Group before presented as part of a separate report in advance of the 2025 deadline for ULEZ compliance.

4.4 To address the shortage of EFAD instructors, it is recommended that:

- LFB offers secondment opportunities to eligible station-based staff to work with Babcock delivering LGV courses (and subsequently EFAD should this be appropriate)
- These secondments would need to be a minimum of three years, which would exceed the current maximum secondment time period. Babcock meets the cost of these secondments and their training, which reflects existing arrangements in the training contract. There is an opportunity cost because seconding FFs creates a vacancy in LFB, but this is balanced against the outcome of increased driver throughput. The cost of back filling a FF post is £67,081 based on the 2025-26 salary cost – recoverable from Babcock.
- Currently secondments are for two years, with an option to extend for a further year following a review. Therefore, this extension review should be carried out prior to offering the secondment and include a full road map back to operational competency at the conclusion of the secondment.
- Babcock are currently developing an Emergency Response Driving Instructor Course that they will be able to deliver so that they can upskill their own staff in this qualification.
- To achieve this, it is advised that the London Fire Commissioner supports Babcock by authorising LFC staff, at their discretion, to claim that the EFAD driver training on road driving element is a 'fire brigade purpose' for the purposes of road safety legislation. This will allow Babcock to undertake more realistic driver training including driving at speeds above the posted limit, utilisation of bus lanes, etc. The proposed agreement, and relevant legislation is detailed in Appendix 1 – Driving Memorandum of Understanding (MOU).
- As with all driver training, Babcock are responsible for insuring the vehicles while in use by instructors.

5 Benefits and Risks of delegating blue light training authority.

5.1 Legislation makes allowances for the claiming of driving legal exemptions when '*being used for fire and rescue authority...purposes, if the observance of that provision would be likely to hinder the use of the vehicle for the purposes for which it is being used.*'

5.2 There is risk associated with allowing Babcock to claim these exemptions for their staff on behalf of the London Fire Commissioner (LFC), who would normally discharge these for their own employees. The risk is that the LFC is allowing the use of these exemption for Brigade purposes to a third party, who are therefore not directly accountable to LFB.

5.3 Blue light training is, however, a critical fire and rescue purpose currently discharged by Babcock. To mitigate this risk, the LFC will maintain robust oversight of Babcock activities in this space. This means:

- LFC receiving notification of all blue light training activity and discharging authorisation.
- LFC maintaining oversight and assurance of quality, capability, and currency of Instructor trainers.
- Clearly defined roles of LFC and Babcock in the event of an accident.

5.4 The MOU details how the above controls will be implemented.

5.5 In practise, this represents an improved level of assurance to what is currently in place, whereby a member of LFB staff must be present for Babcock to carry out blue light runs. The MOU effectively replaces this with an assurance framework. A business case is currently going through the 2025/26 budget setting process to expand the training assurance team. This will further

enhance the monitoring of the MOU's implementation.

6 Costs

6.1 These recommendations will attract the following costs:

- The FRS C post should be identified within existing staff costs as part of a restructure of the Training Operations function with Learning and Professional Development. This forms part of the business case growth bids for that team currently submitted in the 2025/26 budget process.
- The procurement or lease of new driver training vehicles will be raised in a separate report and subject to a business case.
- The secondments to Babcock will be cost neutral. Babcock will reimburse LFB for the cost of each seconded trainer.

6.2 It is not anticipated that these recommendations and delivery model will require additional location requirements and will therefore not impact the LFB estate over and above existing driver training.

7 Summary

7.1 This report introduces an MD delegate support function that includes application workshops, administration of theory test and medical bookings, ensuring a consistent throughput of FFs gaining their LGV provisional Licence.

7.2 This will enable Learning & Professional Development to plan for and train the required number of MDs to maintain the required MD establishment - again coordinated through Training Operations via the FRS C support function.

7.3 Being able to forecast the required number of MD's will also assist with maintaining the establishment of specialist drivers (Command Units, Prime Movers, Turntable Ladders etc).

7.4 The additional throughput of LGV drivers will create a greater demand for blue light driver training. With the current national shortage of blue light driver instructors, there is a need for Babcock to train and develop their own instructors. This can be achieved through agreement, via an MoU, for Babcock to undertake blue light driver training without LFB staff present.

7.5 Allowing Babcock to use the required exemptions (with an assurance programme) will allow them to maintain the competence of current blue light trainers and increase their establishment of trainers.

7.6 By seconding LFB staff to Babcock, it will upskill our staff in driver training qualifications but also boost Babcock's ability to train new blue light instructors and maintain the current LGV provision.

7.7 The requirement for the procurement of new driver training vehicles is for information purposes only at this stage but is a critical element in improving and safeguarding the provision of driver training.

8 Equality comments

8.1 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.

8.2 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.

8.3 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.

8.4 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.

8.5 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.

8.6 The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include steps to take account of disabled persons' disabilities.

8.7 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 to the need to:

- tackle prejudice
- promote understanding.

8.8 An Equality Impact Assessment (EIA) has been completed, and is attached at appendix two. The Equality Impact Assessment Inclusion Team confirmed that no further action or correspondence is necessary at this point. The team will follow up in six months to review the actions listed in section G3 of the EIA, and the mitigation action plan, to check they have been fulfilled. This is to ensure alignment with our legal obligation under the Public Sector Equality Duty.

9 Other considerations

Workforce comments

9.1 The implementation of the driver training improvement strategy will necessitate changes within our workforce, including the recruitment of an FRS(C) administrator and potential secondments for station-based staff to work with Babcock. These changes will:

- Require careful planning to ensure that the recruitment and secondment processes are transparent, fair, and open to all eligible staff, with particular attention paid to equality and diversity principles.
- Involve consultations with representative bodies and FBU to address any concerns and to ensure that the proposals align with existing workforce agreements and practices.
- Include the development of support mechanisms for staff taking on new roles or responsibilities, ensuring they have access to the necessary training and resources

Sustainability comments

9.2 The replacement of four Mk II fire appliances with environmentally friendly, white goods vehicles is a significant step towards reducing the LFB's carbon footprint. This move aligns with the Mayor's emission targets and demonstrates the LFB's commitment to sustainability. Additional sustainability considerations include:

- Assessing the environmental impact of the new vehicles, including life cycle analysis and potential for future upgrades to even more sustainable options.
- Ensuring that the installation of EV charging units at driver training sites is done in an environmentally responsible manner, considering energy sources and efficiency.
- Exploring opportunities to incorporate sustainability principles into all aspects of the driver training program, from material selection to waste reduction.

Procurement comments

9.3 It is anticipated that the Procurement requirements from these changes will be limited to the purchase of additional Fleet Items. Once this paper is approved, responsible officers will complete a FLEET request form and develop a requirements specification. This will allow the FLEET team to engage in sourcing an appropriate vehicle through the Babcock V&E contract. The Procurement Assets and Estates Category will support this process and ensure commercial compliance and best value are achieved.

Communications comments

9.4 This proposal, if agreed, will require an internal communications plan to ensure the workforce are aware of the strategy to improve the availability of MDs in the organization, and upcoming secondment opportunities.

10 Financial comments

10.1 The recommendations outlined in this report represent additional investment requirements for the Learning and Professional Development Department and a potential budget pressure as well as opportunity on operational overtime allowance within Firestations.

10.2 The FRS C position does not currently form part of the Learning and Professional Development Department's establishment. A growth bid for this post has been submitted by the department as part of the 2025/26 budget setting process.

10.3 Secondments to Babcock are expected to be cost neutral for the Learning and Professional Development department. However, additional costs are likely to be incurred through overtime which will have to be calculated as part of the overall costs of this paper. However, it should be considered that driver training will likely close the skills gap on drivers which will reduce the overall reliance on PAO in the longer term.

10.4 The procurement or lease of new driver training vehicles will be raised in a separate report and subject to a business case.

10.5 Upon consideration and approval of this paper a full cost appraisal will need to be completed and considered as part of the 25/26 budget setting process.

11 Legal comments

11.1 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. Section 327D of the Greater London Authority Act 1999, as amended, 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.

- 11.2** 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").
- 11.3** Section 1 of the Fire and Rescue Services Act 2004 states the Commissioner is the fire and rescue authority for Greater London. The statutory basis for the actions proposed in this report is provided by sections 7 and 5A of the Fire and Rescue Services Act 2004 ("FRSA 2004"). Section 7 (2)(a) FRSA 2004 provides the Commissioner has the power to secure the provision of personnel, services, and equipment necessary to efficiently meet all normal requirements for firefighting. Furthermore, section 7 (2)(b) of the FRSA 2004 requires that the Commissioner must secure the provision of training for personnel. Section 5A allows the Commissioner to procure personnel, services, and equipment they consider appropriate for purposes incidental or indirectly incidental to their functional purposes.
- 11.4** This report identifies the current issues in training Motor Drivers (MD) within London Fire Brigade. The report sets out the proposed path to increase the throughput of delegate training on Large Goods Vehicles (LGV) Emergency Fire Appliance Driving (EFAD) and specialist vehicles.
- 11.5** The legal exemption to exceed the posted speed limit derives from Section 87 of the Road Traffic Regulation Act 1984 and the MoU attached to this report sets out all the relevant legislation pertaining to driving exemptions.
- 11.6** If the MOU attached to this report is complied with, the Commissioner will support the 'Response driver training' as being a Fire Brigade 'purpose' under this legislation.
- 11.7** If, at the Commissioner's sole discretion, the Commissioner determines that the MOU has not been complied with or the Commissioner's standards for driving are not complied with or the relevant legislation and guidance has not been complied with then the Commissioner reserves the right to not support the use of the exemption.
- 11.8** The Commissioner cannot guarantee that the claim of an exemption will be accepted by an issuing authority or by a court and makes no warranty or promise to that effect.
- 11.9** The penalties set out in the legislation may still be levied against offenders and the Commissioner does not, in supporting the 'Response driver training' as being a Fire Brigade 'purpose' undertake to pay any fine or take on any liability incurred except where it applies to the Commissioner or its employees under extant Commissioner policy.
- 11.10** For all employees who drive using blue lights and claim any legal exemptions for a fire and rescue service purpose, to have been trained in a consistent way so that they drive safely, in line with the requirements of their role and in accordance with relevant legislation.
- 11.11** For all response driver training instructors and assessors to be qualified in accordance with the relevant legislation.

List of appendices

Appendix	Title	Open or confidential*
1	Driver Training Memorandum of Understanding	Confidential
2	Equality Impact Assessment	Open

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



LONDON FIRE BRIGADE

Part 1: Equality Impact Assessment – submitter to complete

Before carrying out an Equality Impact Assessment (EIA), you should familiarise yourself with the guidance notes and our other resources located within the [EIA section on Hotwire](#)

An EIA should be carried out whenever you are starting (or reviewing) any major new activity/programme/policy/project/strategy/campaign *, or where you propose changes or a review of the previous one.

*In this document, any kind of activity/programme/policy/project will be called an ACTIVITY for an easy read, while you specify the type of your event from your end.

The purpose of an EIA is to meet and justify the legal obligation required under the [Public Sector Equality Duty \(PSED\)](#), namely, the 'DUE REGARD' that documents that your activity/programme/policy will:

- **1. eliminate discrimination, harassment, and victimisation**
- **2. advance equality of opportunity**
- **3. foster good relations between people who share a relevant protected characteristic and people who do not share it.**

In the EIA, you need to show that your activity meets the 3 conditions of the due regard, as listed above, and provide any relevant information showing that your activity caters for people with protected characteristics (where applicable), but also that it promotes equality and eliminates potential discrimination and offers additional opportunities to advance equality.

Where you identified any possible negative impacts on individuals and groups with protected characteristics, you need to complete a mitigating action plan (Section H below). After your mitigating action plan has been implemented, you need to inform the EAI Team by sending the same form again with the notification of the date when the mitigation action plan was completed.

A. Name, goal and the expected outcomes of the programme/ activity

Transport Training Paper. This paper identifies the current issues in training Motor Drivers (MD) within London Fire Brigade. The paper clearly defines the path to increase the throughput of delegate training on Large Goods Vehicles (LGV) Emergency Fire Appliance Driving (EFAD) and specialist vehicles.



LONDON FIRE BRIGADE

B. Reason for Equality Impact Assessment

Please delete as applicable:

- Proposed changes to the existing activity.

C. Names of the team responsible for the programme/ activity

Responsibility for the EIA:

Name: David Bracewell

Job title: Group Commander

Department: Learning & Professional Development

Name: Dan Kipling

Job title: Deputy Assistant Commissioner

Department: Learning & Professional Development

Responsibility for the whole activity:

Name: Keeley Foster

Job title: Assistant Commissioner

Department: Learning & Professional Development

D. Who is this activity for, who is impacted by it (all LFB staff, specific department, external communities)

LFB staff. This activity impacts Fire fighters in Development (FFD) approaching their 18-month end point assessment, Fire fighters that are contractually obliged to drive and Fire fighters that are not contractually obliged to drive but want to undertake the skill.

E. What other policies/documents are relevant to this EIA?

[Public Sector Equality Duty](#)



LONDON FIRE BRIGADE

[Equality Act 2010](#)

[Your London Fire Brigade – Our plan for 2023-2029 \(CRMP\)](#)

[LFB Values](#)

[Grey Book](#)

[People Services Strategy](#)

[Policy No. 973 LFB Equity policy](#)

[Protected characteristics resource library](#)

[Policy No. 370 Policies and procedures guidance](#)

[Policy No.290 Translation and interpretation](#)

[Inclusive and accessible documents for neurodivergent individuals – tips and resources 2024](#)

[The LFB key EDI terminology](#)

[HRE136 Meeting the religious, spiritual and pastoral care needs of staff](#)

[Role to rank collective agreement 2019](#)

[Policy No. 1005 Supporting health and wellbeing](#)

[Policy No. 323 Trans inclusion policy](#)

[Policy No. 555 Family support leave \(including maternity\) policy](#)

[Policy No. 313 Maternity provisions – breast feeding policy](#)

[Policy No. 969 Menopause policy](#)

[Policy No. 448 Working with choice – flexible working options policy](#)

[Policy No. 813 Driving Brigade Vehicles](#)

[Policy No. 788 Electronic Personal Record File \(E-PRF\) Policy](#)

[No. 965 – Equality support groups](#)



LONDON FIRE BRIGADE

F. Equality and diversity considerations

Describe the ways how your activity meets the conditions of the due regard of the PSED and how LFB employees and communities of London may be affected by your activity, especially those ones with protected characteristics. Explain whether your programme/activity may disproportionately affect any group named below?

Protected characteristics Equality Act 2010:

- Age
- Disability/Barrier
- Gender and gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race including ethnicity and nationality
- Religion or belief
- Sexual orientation

Also considering:

- Caring responsibilities
- Socio-economic backgrounds

At the end of your explanation, please, list the sources you have used.

Age

The majority of staff are between the 30 – 49 age ranges (68%) with 18% between 50 – 59 and 1% aged 60 and over, and 12% under 29 across all staffing groups.

Staff within the 50 – 59 (18%) and over 60 (1%) will be subject to additional medicals on obtaining and renewing their LGV licence. Whilst this requirement disproportionately impacts this age group, this proposal introduces positive mitigations through the provision of a dedicated FRS C role to support this process.

There is a legal minimum age requirement to drive a Light Goods Vehicle along with the minimum age of joining the Fire and Rescue Service is 18 there is no restrictions.

Having no age restrictions promotes good relations between the age ranges providing opportunity for access with no restrictions together. This means that all staff across all ranks have access to these provisions.

Disability/Barrier

The total percentage of staff across all staffing groups who have self-declared as having a disability is 8% with 4% either preferring not to say or have not provided their information.



LONDON FIRE BRIGADE

The training offer will have no direct barriers for those staff who have declared a disability (8%) and will be in line with the PN1005 Supporting health and wellbeing policy so that workplace adjustments can be considered/provided as well as recorded on the new workplace adjustment passport to enable access. This eliminates discrimination and provides advancement of opportunity for those with a disability (8.%) and those within this protected characteristic group to access these provisions. This in turn means that those within this protected characteristic and those without have access to these provisions and support, together fostering good relations.

Policy No. 860 Unit 9 of the Firefighter role map (FF9) sets alternative to driving within this policy provides a direct reasonable adjustment for this protected characteristic group.

Gender and gender reassignment

The gender breakdown of staff is 11% female and 89% male as a total across all staffing groups. The LFB does not currently record EDI staff data for gender reassignment but for the purposes of this EIA, it has been considered there are staff in this group within the workforce across all staffing areas.

The training offer has no gender restrictions between the mix of genders so eliminates discrimination and provides advancement of opportunity for those in the female minority. Having no gender restrictions promotes good relations between the genders provides access to these provisions together. Support is available through this policies provisions and PN1005 Supporting health and wellbeing policy.

The LFB does have staff who have and are transitioning and the PN323 Trans Inclusion policy has been applied within these provisions and there are no barriers identified that cannot be managed within PN323 and PN1005 when applied to this training offer.

Marriage and civil partnership

The LFB does not currently record EDI staff data for marriage and civil partnership but for the purposes of this EIA, it has been considered there are staff married and in a civil partnership within the workforce across all staffing groups.

The training offer has no restrictions for those with these characteristics and those who do not so eliminates discrimination and provides advancement of opportunity for those that do by having access. Having no restrictions promotes good relations between those that are married, in civil partnerships and those who are not by providing access to these provisions together.

Pregnancy and maternity

The LFB does not currently record EDI staff data for pregnancy and maternity but for the purposes of this EIA, it has been considered there are/have been staff pregnant and/or on maternity within the workforce across all staffing groups.



LONDON FIRE BRIGADE

The training offer has no restrictions for those with these characteristics and those who do not so eliminates discrimination and provides advancement of opportunity for those that do by having access. Having no restrictions promotes good relations between those that are pregnant, absent on maternity leave or returned from maternity leave, and those who are not by providing access to these provisions applied together. Support is available within this policy as well as PN1005 for this protected group.

Policy No. 860 Unit 9 of the Firefighter role map (FF9) sets alternative to driving within this policy provides a direct reasonable adjustment for this protected characteristic group.

Race including ethnicity and nationality

The breakdown of staff race and ethnicity is 16% Black, Asian and minority ethnic and 80% white with 4% preferring not to say or not providing information. The LFB does not record EDI staff data for nationality but for the purposes of this EIA, this has been considered within the workforce across all staffing groups.

The training offer has no race/ethnicity/nationality restrictions across any of these characteristics so eliminates discrimination and provides advancement of opportunity for those groups within the minority by having access. Having no restrictions promotes good relations between the staff and their different races, ethnicities and nationalities providing access to these provisions together.

Religion or belief

The majority of staff are recorded as no religion at 40% with Christian recorded as the highest percentage at 31%. Other is 3%, Muslim 2% and Jewish, Buddhist, Sikh, Hindu at 1% with 20% either not providing their information or preferring not to say. These are the totals across all staffing groups within the workforce.

The training offer has no religion or belief restrictions across any of these characteristics so eliminates discrimination and provides advancement of opportunity for those groups within the minorities by having access. Having no restrictions promotes good relations between the staff and their different races, ethnicities and nationalities providing access to these provisions together.

Sexual orientation

There is 6% of the workforce across all staffing groups recorded as LGB with 24% preferring not to say or not providing the information. The data refers to LGB.

The training offer has no sexual orientation restrictions for the 6% of the workforce recorded as LGB so eliminates discrimination and provides advancement of opportunity for those in this minority of the workforce. Having no sexual orientation restrictions promotes good relations between the genders providing access to these provisions together.



LONDON FIRE BRIGADE

Caring responsibilities

The LFB does not currently record EDI staff data for caring responsibilities but for the purposes of this EIA, it has been considered that there are staff with caring responsibilities within the workforce across all staffing groups. These responsibilities are within the Carer Act and extend beyond it.

The Carer Act 2014 covers employees in England, Wales and Scotland. Employees are entitled to 1 week's unpaid leave per year if providing or arranging care for someone with long term care needs. This can be taken flexibly (in half or full days) for planned and unforeseen caring commitments.

Policy No. 0512 Special leave and public duty leave policy supports carers requiring paid or unpaid leave to undertake caring responsibilities.

The training offer has no restrictions for staff with caring responsibilities so eliminates discrimination and provides advancement of opportunity for those in this minority of the workforce. Having no caring responsibility restrictions promotes good relations between the groups providing access to these provisions together.

Socio-economic backgrounds

The LFB does not currently record EDI staff data for socio-economic backgrounds but for the purposes of this EIA, this has been considered within the workforce across all staffing groups.

PN 973 Togetherness Policy – Togetherness means moving beyond being compliant, or 'box-ticking' on equality and diversity. It means we are taking steps to move LFB towards being ambitious, bold organisation, which is truly inclusive of everyone of us, one which is inspired by our diverse staff and communities, and which doesn't just accept, but expects, difference.

The training offer has been developed with PN973 Togetherness policy in mind and does not create barriers because it applies to all employees capturing the widest selection of staff possible. There are no restrictions such as pre-required qualifications and the provisions are communicated using inclusive language so that they are clear. The provisions facilitate staff with various socio-economic backgrounds to interact in line with PN973 positively.

To support staff obtaining the LGV licence, they're able to request the LGV licence fee in advance which they will receive in their monthly wage.

It should be noted that holding a driving licence is a barrier to joining London Fire Brigade but this will not be resolved through the transport training paper.



LONDON FIRE BRIGADE

Policy No. 860 Unit 9 of the Firefighter role map (FF9) sets alternative to driving within this policy provides a direct reasonable adjustment for this protected characteristic group.

Sources

[EIA - Equalities Data Summary by occupational group LFB LIVE](#)

[Key data sources](#)

G. Evidencing Impact

Please answer the following four questions:

G1.

a. List all the internal/external stakeholders and organisations you have consulted or contacted regarding your activity, along with the insights gained from these interactions?

b. Explain how you have gained and evaluated your insights and whether you intend to conduct a follow-up or seek post-activity feedback from those stakeholders?

FBU - trade union

FOA - trade union

Prospect - trade union

Disability Working Group – Staff Equality Support Group

Asian Fire Services Association– Staff Equality Support Group

Mental Health Support Group – Staff Equality Support Group

Emerald Society - Irish Group – Staff Equality Support Group

LGBTQ+ Network – Staff Equality Support Group

Women in the Fire Service - – Staff Equality Support Group

Menopause Action Group – Staff Equality Support Group

Neurodiverse Support Group – Staff Equality Support Group

Phoenix – Domestic Abuse Support Group – Staff Equality Support Group

Black and Ethnic Minority Members Support Group - – FBU Equality Support Group

Women Advisory Committee – FBU Equality Support Group

LGBT+ Section - – FBU Equality Support Group

People Services

Central Operations

The trade unions experiences and insights were obtained and reviewed/evaluated against the purpose and arrangements of the policy provisions. This has been completed over a number of months at the monthly training/ trade union meeting.



LONDON FIRE BRIGADE

The Transport Training paper, MoU and EIA has been shared with the ESG's – we currently awaiting responses

Face to face feedback from lived experience has been gained from number of the ESG members to help inform/ review and evaluate the paper to ensure it is supporting all staff to access driver training.

G2. Have you faced any gaps in evidence for assessing your activity's impact, and if so, can you justify proceeding with the EIA without addressing them or are you considering a mitigation action plan?

The LFB does not currently monitor staff data in relation to nationality, gender reassignment, marriage, civil partnerships, caring responsibilities or socio-domestic backgrounds. This did not stop us from assessing the impact on people with these protected characteristics, as the assumption was made that people with these PCs exist within our workforce.

G3. What adjustments have you considered for people with protected characteristics, and how does your activity promote equality of opportunity and caters for equity for them?

Age

This proposal introduces positive mitigations through the provision of a dedicated FRS C role to support this staff entering the process of becoming MD's for London Fire Brigade.

Disability/ Barrier

The paper is supported by LFB policies regarding individual personal adjustments including PN553 Learning support

This proposal introduces positive mitigations through the provision of a dedicated FRS C role to support staff undertaking the process to become LGV and EFAD drivers.

PN1005 Supporting health and wellbeing policy so that workplace adjustments can be considered/provided as well as recorded on the new workplace adjustment passport to enable access.

Gender and gender reassignment

The LFB does have staff who have and are transitioning and the PN323 Trans Inclusion policy has been applied within these provisions and there are no barriers identified that cannot be managed. Policy PN323 Ensures gender neutral language is used across our whole training provision.

Marriage and civil partnership

The London Fire Brigade (LFB) is committed, and aspires, to be a great place to work as an organisation which celebrates and supports difference and creates a culture where everyone feels a sense of belonging. We therefore take a firm, and consistent, stand against harassment, bullying or discrimination. This means that, incidents connected (directly or indirectly) to age,



LONDON FIRE BRIGADE

race, sex, sexual orientation, gender identity and expression, disability, religion and any other characteristic related to identity will be treated seriously and in accordance with the Equality Act (2010).

Pregnancy and maternity

PN555/313 Maternity –

PN448 Flexible working which can be recorded in the staff's workplace adjustment passport. This allows staff to manage caring responsibilities and the requirement to become a MD.

Race including ethnicity and nationality

The London Fire Brigade (LFB) is committed, and aspires, to be a great place to work as an organisation which celebrates and supports difference and creates a culture where everyone feels a sense of belonging. We therefore take a firm, and consistent, stand against harassment, bullying or discrimination. This means that, incidents connected (directly or indirectly) to age, race, sex, sexual orientation, gender identity and expression, disability, religion and any other characteristic related to identity will be treated seriously and in accordance with the Equality Act (2010).

Religion or belief

The London Fire Brigade (LFB) is committed, and aspires, to be a great place to work as an organisation which celebrates and supports difference and creates a culture where everyone feels a sense of belonging. We therefore take a firm, and consistent, stand against harassment, bullying or discrimination. This means that, incidents connected (directly or indirectly) to age, race, sex, sexual orientation, gender identity and expression, disability, religion and any other characteristic related to identity will be treated seriously and in accordance with the Equality Act (2010).

Sexual orientation

The London Fire Brigade (LFB) is committed, and aspires, to be a great place to work as an organisation which celebrates and supports difference and creates a culture where everyone feels a sense of belonging. We therefore take a firm, and consistent, stand against harassment, bullying or discrimination. This means that, incidents connected (directly or indirectly) to age, race, sex, sexual orientation, gender identity and expression, disability, religion and any other characteristic related to identity will be treated seriously and in accordance with the Equality Act (2010).

Caring responsibilities

The Carer Act 2014 covers employees in England, Wales and Scotland. Employees are entitled to 1 week's unpaid leave per year if providing or arranging care for someone with long term care needs. This can be taken flexibly (in half or full days) for planned and unforeseen caring commitments.



LONDON FIRE BRIGADE

Policy No. 0512 Special leave and public duty leave policy supports carers requiring paid or unpaid leave to undertake caring responsibilities.

Socio-economic backgrounds

PN 0514 expenses - To support staff obtaining the LGV licence, they're able to request the LGV licence fee in advance which they will receive in their monthly wage.

It should be noted that holding a driving licence is a barrier to joining London Fire Brigade, but this will not be resolved through the transport training paper.

eG4. How do you communicate the activity to those involved, especially with protected characteristics, and have you considered diverse formats such as audio, large print, easy read, and other accessibility options in various materials?

The Transport Training paper has been produced in line with the LFB's policy standards on writing policies using the 'Key EDI terminology' and accessible communication guidance ([2425305963Inclusive and Accessible Documents for Neurodivergent](#)). It is self-service accessible both internally and externally, and available in a range of diverse formats in line with the Communications policy PN290 (customer service level 0).

Training Helpdesk is available for staff to contact for advice and support in the provision of training.

An HR Helpdesk is available for all staff to contact for advice and support (customer service level 1) as well HR staff available to meet with staff to explain policy provisions (customer service level 2). The LFBs specialist HR Inclusion team is also available to provide specialist advice relating to protected characteristics (customer service level 3).

This ease of accessibility supports the People Services strategic priority of 'creating a positive and inclusive culture' to achieve its aim of enabling our people to be the best that they can be to serve its people and the communities in line with the LFB delivery plan 2023-2029.



LONDON FIRE BRIGADE

H. Mitigating action plan (where an adverse impact has been identified, please record the steps that are being taken to mitigate or justify it?)

Protected characteristic and potential adverse impact	Action being taken to mitigate or justify	Lead person/department responsible for the mitigating action
N/A	N/A	N/A

I. Signed by the Submitter

Name: David Bracewell

Rank/Grade: Group Commander

Date: 01/05/2024



LONDON FIRE BRIGADE

Part 2: Inclusion team to complete - feedback and recommendations

J. EIA Outcomes

Select one of the four options below to indicate next steps:

Recommendation 2: Continue and correct the activity accordingly following our feedback – this involves taking steps to remove any barriers to better advance equality and/or to foster good relations.

K. Feedback

Please specify the actions required to implement the findings of this EIA and how the programme/ activity's equality impact will be monitored in the future. It may be helpful to complete the table.

[text to be completed by the EIA Team]

L. Sign off by EIA Inclusion team

Date: