

# Urban Firefighting Training

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**Report to:****Date:**

Investment & Finance Board.....	26 October 2023
Commissioner's Board.....	7 November 2023
Deputy Mayor's Fire and Resilience Board.....	21 November 2023
London Fire Commissioner .....	

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**Report by:**

Daniel Kipling, Deputy Assistant Commissioner, Learning and Professional Development

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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 6 December 2023

# PART ONE

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

### Executive Summary

This report provides a roadmap for delivering the Urban Firefighting Course – a modern, realistic, and challenging real fire training course. It explains the reasons why London Fire Brigade (LFB) need to invest in their training for fighting fires to achieve the industry standard, and comprehensively deliver on the recommendations of the Regulator, and learning from major incidents including the Grenfell Tower fire.

The report details the cost of upskilling operational staff to carry out Positive Pressure Ventilation (PPV). It proposes the next steps for developing this core skills course into a modern, future-proofed training Centre of Excellence in partnership with the Brigade's training partner, Babcock Training Limited (BTL).

### Proposed decision – the London Fire Commissioner

The London Fire Commissioner agrees to commit expenditure set out in Part Two for the purposes of developing the Urban Firefighting Course. This includes:

- delivering a two-day Positive Pressure Ventilation (PPV) course for station-based operational staff over a two-year period
- delivering a two-day advanced fire behaviour training course for firefighters on development
- procuring PPV fans and ancillary equipment for 142 pumping appliances, with associated vehicle modifications

In addition, it is recommended that the London Fire Commissioner explores long-term investment in partnership with LFB's training provider to develop a Centre of Excellence for fire behaviour training following the implementation of PPV.

## 1 Introduction and background

- 1.1** The London Fire Brigade (LFB) training offer, whether provided by Babcock or through local delivery, requires a radical overhaul to ensure it meets the demands of an emergency service responsible for the safety of a global city. LFB currently has a good baseline level of training provision, but it is clear from experiences over the last few years that it is no longer aligned to the risks faced today, or those anticipated for the future, so requires significant investments and resource to address this gap.
- 1.2** There is demonstrable evidence that failure to understand fire behaviour and adapt to changing circumstances leads to accidents, injuries, and firefighter fatalities. This evidence is detailed in Appendix 1.
- 1.3** The London Fire Brigade (LFB) Community Risk Management Plan (CRMP) 'Your London Fire Brigade' was published on 1 January 2023. The CRMP describes four pillars that the Brigade will work to over the life of the plan, from which derive eight commitments to London and Londoners.
- 1.4** The Delivery Plan explains how LFB will achieve those commitments. The commitment to 'adapt our services as your needs change' is delivered through modern fire and rescue technology, training, and tactics. Introducing PPV and building to the Urban Firefighting Course is critical to achieving this aim.

- 1.5** LFB's Response strategy details the organisation's Assessment of Risk, which notes fire involving purpose-built flats and fire involving houses and bungalows as the highest likelihood risks, with most serious consequences. The Urban Firefighting Course is listed as part of the mitigation for these risks, by ensuring *'that our firefighters have the necessary skills, equipment and vehicles to protect London, its people, and to work safely'* and allowing us to *'adopt the most modern fire and rescue technology and tactics, to enable us respond better to all types of emerging risks'*.
- 1.6** Understanding fire behaviour and its relationship to building construction is essential for firefighters to stay safe, be effective and save life. Fighting fires in the complex and changing built environment has become more challenging. An agile training strategy about fighting fires is required to ensure operational staff are competent in understanding fire behaviour and applying appropriate tactics in this environment.
- 1.7** The Grenfell Tower Inquiry recommended that LFB 'develop policies and training to ensure better deployments and use of resources' and 'that all fire and rescue services ensure that their personnel at all levels understand the risk of fire taking hold in the external walls of high-rise buildings and know how to recognise it when it occurs'.
- 1.8** The Lakanal House Rule 43 letter to the LFB recommended training on how 'to anticipate that a fire might behave in a manner inconsistent with the compartmentation principle and 'to be aware of the risks to those above and adjacent to the fire flat'.
- 1.9** Training must include the opportunity for staff to undertake a learning experience where they can make mistakes in a safe environment, practice their skills in realistic conditions with the appropriate level of scale and challenge and where those skills can be assessed and assured.
- 1.10** Transforming LFB into a modern fire service which uses the latest firefighting technology requires a training venue and training course which delivers realistic, challenging environments beyond what is currently provided by LFB's facilities.
- 1.11** In planning the Urban Firefighting Course, LFB has reviewed current delivery of training against the industry standard (National Operational Guidance – N.O.G). This course will allow LFB to train staff in N.O.G training specifications currently not achievable at existing training venues.
- 1.12** Specifically, this skills gap relates to firefighter's understanding of tactical ventilation to control fire behaviour, and the use of a technique known as Positive Pressure Ventilation (PPV). PPV is used by Fire Services worldwide to control the environment within a structure that is on fire or filled with hazardous fumes. Firefighters manipulate ventilation flow paths in a building to influence fire behaviour, often using mechanical fans to assist.
- 1.13** His Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) also recognised in broader terms the need to modernise LFB's operational response to improve service to Londoners. In their last inspection of LFB in 2021/22 they found that:
- The Brigade should make sure it puts in place and delivers a plan to adopt N.O.G
  - The Brigade should make sure its response strategy provides the most appropriate response for the public in line with its integrated risk management plan.
  - The Brigade needs to train all staff properly for their roles.
- 1.14** The restrictions of LFB's baseline training offer are recognised in a range of risks on LFB's corporate risk register, which can be mitigated by progressive, realistic, and challenging fire behaviour training:
- Failure to achieve minimum service standards delivery (N.O.G) places the wider community at risk: this proposal will address this gap.
  - Failure to identify organisational learning through investigation and review of the LFB's response to the Grenfell Tower fire means that poor performance is repeated in the future exposing staff and public to unacceptable safety hazards. This course progresses the work already carried out in response to Phase 1 of the Grenfell Tower Inquiry and provides a vehicle to sustain change.
  - The Grenfell Tower Public Inquiry results in further conclusions about Brigade policies or actions which reduce staff or public confidence. This course addresses some of the anticipated

outcomes of Phase 2 of the Grenfell Tower Inquiry.

- The Brigade's leadership is not sufficiently focused on delivering an effective and improving safety culture to prevent injuries and ill health. Investing in risk critical staff training, and providing modern techniques and technologies demonstrates a commitment to a health and safety culture.
- Failure to identify high impact, low frequency events and train for them which exposes the safety of our staff their competence to deal with them. A modern, flexible training facility provides the vehicle to train staff on incident types which replicate the complexity and scale of the risk in London. This is currently not possible at LFB's existing venues.
- In an emergent and unregulated alternative fuels market, the Brigade is unable to keep pace with new fire and rescue responses to alternative fuel technology applications, complex fire dynamics and commercial uptake which potentially exposes the safety of our staff and the public at incidents. The facilities provided by this new training initiative provide the flexibility and realism to test and train on new and emergent risks.
- Lack of support afforded to trainees during their apprenticeships leaves trainees isolated from the Brigade and at risk from harm, from the start of their career journey at training school through to end point assessment. This proposal creates a bespoke two-day advanced fire behaviour course for trainees, which will support trainees in their journey onto station.

**1.15** A full breakdown of these risks is detailed in Appendix 2.

**1.16** Investing in staff development is also key to driving behavioural change and professionalising the service following the findings of the Independent Review of Culture. Delivering a challenging and realistic training environment is totemic in demonstrating to staff that LFB is changing.

## **2 Existing training provision for fighting fires**

**2.1** Following the Firefighter Development (FFD) training programme, a firefighter should have an adequate level of knowledge to respond to emergencies under supervision. It is recognized that the existing 13-week programme requires enhancement, and this is recognized in the 2023-26 training plan.

**2.2** Continuous professional development (CPD) is currently provided through:

- Development and Maintenance of Operational Professionalism (DaMOP). Primarily watch-led and station-based training on basic core skills e.g. Pumps and pumping.
- Two-day firefighting course. An annual course combining classroom and practical application at a Real Fire Training Venue (RFTV) in London – Becton or Park Royal Training Centres.
- Borough exercises. Four-pump and large-scale exercises to practise DaMOP skills and support borough training plans and response to local risks.
- Breathing Apparatus (BA) exercises at area BA chambers

**2.3** The two-day firefighting course is currently the primary learning opportunity to understand fire behaviour and practise tactics. It also assists the London Fire Commissioner (LFC) to meet the minimum training requirement stipulated in the N.O.G breathing apparatus (NOGBA) training specification.

**2.4** This specification requires the competence of personnel who undertake BA roles to be 'assessed at least once within a two-year period...in realistic conditions, including heat and smoke.'

**2.5** The course content changes annually in response to learning from incidents; safety events; incident management process and national and international learning. All theory content is available on BigLearning to ensure legacy material is accessible.

**2.6** DaMOP content is also updated where practises change as a result of these learning opportunities.

**2.7** Some subject areas are complex and are built upon each year, as they take time to embed, for example,

understanding fire dynamics and anti-ventilation.

- 2.8 RFTVs can facilitate foundation training for firefighting skills. However, a gap analysis of N.O.G firefighting competencies identified areas of required improvement.
- 2.9 This analysis also identified efficiencies where RFTV can be optimized by using other venues to deliver content that does not require real fires (such as BA Chambers).
- 2.10 As well as contributing to the funding of the Urban Firefighting Course, these efficiencies will also enable the release of staff.

### **3 Objectives and expected outcomes**

- 3.1 The objective of this paper is to secure funding to introduce a real fire training course at a training venue where products of combustion can vent outside of the fire compartment. This course will be delivered to 4,320 fire station-based operational staff.
- 3.2 The delivery of this course represents an increase in the training delivery to operational staff, and as such capacity for staff release is an important factor. There are a range of measures that the project team have considered to manage this, including the phasing of the training, improving efficiencies in existing training delivery and the training plan for 2024/25.
- 3.3 A breakdown of the cost of this proposal is detailed in Part Two as Appendix 3 and includes the cost of procuring the equipment to introduce this skill.
- 3.4 Delivery of this course and capability will mitigate a range of corporate risks, as detailed in Appendix 1.
- 3.5 Initially, this will be a two-day course focused on introducing Positive Pressure Ventilation (PPV) for all operational staff. Training for this core skill cannot currently be carried out in London. PPV is a skills requirement within N.O.G and is a foundation skill from which more complex and challenging training can be built.
- 3.6 Training will be rolled out by Borough over a two-year period. The order in which Boroughs will participate in training will be based on the historic risk of fire in that Borough.
- 3.7 This proposal is included in the 2023-26 Training Plan (LFC-23-073) under Phase 1 of the 'Transforming our Future' section, which is a growth bid. BTL have committed to delivering the volume of courses alongside existing courses within the framework of the training contract.
- 3.8 Firefighters on development will also receive a separate two-day advanced fire behaviour course.
- 3.9 It is proposed this training takes place at the Fire Service College (FSC), delivered via the BTL training contract. The FSC has the capacity and facilities to deliver on the course requirements.
- 3.10 Work has been undertaken in partnership with BTL to investigate suitable training venues. This established that it is not possible to build a venue within London that meets the requirements of the course.
- 3.11 Venues outside of London in close enough proximity to facilitate the course were also considered. These included West Midlands Fire and Rescue Service, Northamptonshire Fire and Rescue Service and the services bordering London. However, these are unable to manage the capacity that would be required alongside their own training needs; others would not be able to deliver the required learning outcomes.
- 3.12 It is proposed that the existing two-day firefighting course delivered within London is reduced to one day, with content focused on foundation knowledge. This recognises that more advanced real fire training is delivered on the Urban Firefighting Course and delivers saving in Training Units equivalent to £2,328,300 per year.

### **4. Funding and Future development**

- 4.1 In order to truly realise its ambition to become a leading fire and rescue service in modern firefighting technologies and tactics, LFB must continue to train staff in complex and challenging real fire environments.

- 4.2** Due to the large-scale investment required in this area and past decisions made around training provision (notably the outsourcing to BTL in a long-term contract), it will not be achievable for LFB to deliver the level of capability uplift required from existing revenue budgets and also to deliver a balanced budget, without making significant reductions to services.
- 4.3** Therefore, at this point the LFB is proposing an investment bid to fund additional firefighter training to ensure modern day standards are upheld. The funding for this bid is subject to commercial sensitivities, and as such is detailed in Part Two.
- 4.4** After the delivery of the PPV course, LFB will look to build on the establishment of this core skill, as well as continue to deliver CPD.
- 4.5** This will take place in year three and will be delivered in partnership with BTL to develop the best commercial model which considers the need to minimise up front capital required from LFB, provide an exceptional bespoke urban training environment and balance the best value for money solution with an appropriate return for Babcock. This is intended to move LFB away from the Fire Service College and into its own facility.
- 4.6** As detailed in 3.11, LFB have identified the training unit equivalent of £2,328,300 efficiencies in training to support this and will look for support from central and local government to sustain this over the longer term.

## 5. Equality comments

- 5.1** 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.
- 5.2** 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.
- 5.3** 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.
- 5.4** 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.
- 5.5** 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.
- 5.6** 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.
- 5.7** 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.

- 5.8** The development of the Equalities Impact Assessment (EIA) for this proposal has identified that there are a number of impacts and opportunities for this course. For instance, as this is a residential course it will impact on people with caring responsibilities. Data indicates that women are proportionately more likely to be carers than men, so would be disproportionately affected. There is also an opportunity here to consider gender neutral facilities in the selection of training venue. The design of the course provides an opportunity to mitigate some of these impacts, such as thorough course planning (providing advance notice of any training) and selection of facilities.
- 5.9** The course's aim is to align LFB operational staff with modern, national standards of fire behaviour and fire equipment, which means that it will result in saving lives of Londoners more efficiently. That means that the course has potentially highly positive impact on the LFB customers (London communities) and LFB staff (less risk and fewer injuries). In particular, the residents of high rises and council estates, who are often immigrants and non-English speakers, but also those who are fragile, like the elderly and people with disabilities, meaning that this provides positive opportunities.
- 5.10** The EIA that has been produced is an initial assessment to identify potential impacts in securing the budget to design and deliver this course. This will continue to be developed in partnership with Inclusion colleagues as the course design matures to ensure as far as possible that the training is accessible to all relevant staff groups, and the opportunities of its delivery are fully realised for both staff and Londoners.

## 6 Other considerations

### Workforce comments

- 6.1** Workforce engagement indicates that investment in training is welcomed, as is the implementation of modern firefighting technology and tactics. Trade Unions, in particular the Fire Brigades Union (FBU) and Fire Officers Association (FOA), which represents the majority of station-based staff and officers, will require significant consultation as part of the course development, and will require a place on the project board.

### Sustainability comments

- 6.2** To ensure sustainability, all strategies, policies, and projects originating from the LFB should be analysed under the Sustainable Development Impact Assessment (SDIA) process. The SDIA process supports the Brigade to avoid or minimise environmental impact and take opportunities to improve social and economic outcomes in London through the service we provide.

### Procurement comments

- 6.3** The procurement process for the equipment required to deliver this course will be carried out by Babcock Critical Services and will be carried out under a competitive tender process. This will follow the usual process, where Babcock will produce a Tender Specification which details all the LFB requirements and gives them a score, which relates to the importance that the feature. In the case of PPV, this will be procured from a Framework.
- 6.4** Once the tenders are received, they will be scored using the scores detailed in the tender specification. Additional scores will be included which cover the company's financial standing and ability to support the product over its expected life. In this case it would be a 5-year operational life. The scoring is divided between technical compliance and financials, with a ratio of 60% of the score attributed to the procurement and financial aspects, with 40% on the products engineering aspects. The scoring process involves OP&A, FLEET and Babcock.
- 6.5** The product that scores the highest will usually be the one that is accepted; however, operational tests are also carried out which may highlight issues or concerns which might override the highest scoring product. Babcock will negotiate the contract to supply the product with the selected



supplier and will manage the ongoing support and repair of the product for the full operational life. The cost of this is covered within the slot price, which must be agreed as part of the procurement process.

- 6.6** The provision of training will be delivered by the Brigade's training partner, Babcock Training Limited, and will be delivered within the Framework of the training contract.

## **Communications comments**

- 6.7** Communication for this will be created closer to the launch of the equipment and training.

## **7. Financial comments**

- 7.1** Finance comments are included in Part Two of this paper.

## **8. Legal comments**

- 8.1** This report seeks approval for training of operational staff in Positive Pressure Ventilation, as part of a suite of Urban Firefighting skills.
- 8.2** By virtue of section 9 of the Policing and Crime Act 2017, the London Fire Commissioner (the "Commissioner") was established as a corporation sole with the Mayor appointing the occupant of that office. Under section 327D of the GLA Act 1999, as amended by the Policing and Crime Act 2017, the Mayor may issue to the Commissioner specific or general directions as to the manner in which the holder of that office is to exercise his or her functions.
- 8.3** 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"). Paragraph (b) of Part 2 of that direction requires the Commissioner to seek the prior approval of the Deputy Mayor before "[a] commitment to expenditure (capital or revenue) of £150,000 or above is identified in accordance with normal accounting practices...". Funding for the Urban Firefighting Course, as detailed in this report, exceeds the specified limit and, as such, requires prior approval of the Deputy Mayor.
- 8.4** Under section 1 of the Fire and Rescue Services Act 2004 ['the 2004 Act'], the Commissioner is the fire and rescue authority for Greater London. Section 7(2) of the 2004 Act, requires the Commissioner to secure provision of the necessary training for personnel to discharge the duty of firefighting.
- 8.5** On 14th June 2017 there was a fire at Grenfell Tower, which claimed the lives of 72 people. The subsequent inquiry – The subsequent Grenfell Tower Inquiry ['GTI'] established by virtue of the Inquiries Act 2005, examined factors leading to and causative of the fire - , was heard in two parts. Phase one examined the events on the night of the fire, how it was handled by the emergency services and how the building behaved in the fire.
- 8.6** Recommendation 5 of the GTI Phase One report cites LFB's high rise policy PN633, and modifications required therein, to avoid events on the night of Grenfell Tower being repeated in future. Training of operational personnel in Urban firefighting techniques form part of the skills covered by PN633.
- 8.7** In the 2018/19 inspection report on LFB by His Majesty's Inspectorate of Constabulary and Fire and Rescue Services ['HMICFRS'] alignment of policies with National Operational Guidance ['NOG'] was referenced. Training in Urban Firefighting is in part fulfilment of this objective.



## List of appendices

Appendix	Title	Open or confidential*
1	Fire behaviour findings from firefighter fatality and Senior Accident Investigations	Open
2	LFB corporate risks mitigated by urban firefighting course	Open
3	Cost breakdown (Part 2)	Confidential
4	Business Case	Confidential

## 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

**[Before beginning, please save this document to your personal drive otherwise you will make changes to the master document on Hotwire]**

The purpose of an EIA is to give as much information as possible about **potential** equality impacts, risks or opportunities that your policy, activity or project may have on different groups of people.

This Equality Impact Assessment should:

- demonstrate due regard for the provisions of the Public Sector Equality Duty;
- identify possible negative impacts of decisions on individuals and groups with protected characteristics and plan mitigating action accordingly; and,
- identify additional opportunities to advance equality within policies, strategies, and services.

## Summary

1. What is the name of the policy/project/decision/ activity and what is it about?	
<p>Urban Firefighting Course: the delivery of a two-day residential course at the Fire Service College for all fire station-based operational staff for the purposes of introducing Positive Pressure Ventilation (PPV) and modern firefighting tactics.</p> <p>Initially, this will be a two-day course for all station-based operational staff. Training for this core skill cannot currently be carried out in London. PPV is a skills requirement within National Operational Guidance (N.O.G) and is a foundation skill from which more complex and challenging training can be built.</p> <p>Training will be rolled out by Borough over a two-year period. The order in which Boroughs will participate in training will be based on the historic risk of fire in that Borough.</p> <p>This proposal is included in the 2023-26 Training Plan (LFC-23-073) under Phase 1 of the 'Transforming our Future' section, which is a growth bid. Babcock Training Limited (BTL) have committed to delivering the volume of courses alongside existing courses within the framework of the training contract.</p> <p>Firefighters on development will also receive a separate two-day advanced fire behaviour course. It is proposed this training takes place at the Fire Service College (FSC), delivered via the BTL training contract. The FSC has the capacity and facilities to deliver on the course requirements.</p> <p>Delivery of this course and capability will mitigate a range of corporate risks, as detailed in the business case.</p>	
2. What is its purpose and desired outcome	
<p>What is the aim and purpose of the policy, project, decision or activity?</p>	<p>The aim of this decision is to secure funding to develop the Urban Firefighting Course. The subsequent design of the course provides an</p>



LONDON FIRE BRIGADE

	opportunity to put mitigation in place for impacts and take opportunities for positive impacts.
Who is affected by this work (all staff, specific department, wider communities?)	This primarily affects fire station-based operational staff from firefighter through to level two officers. However, there are benefits for the communities that LFB serve and the development of this course will have an impact on both control staff and non-operational staff. As a result of the delivery of this course, LFB will better serve its communities.
What other policies/documents are relevant to this EIA?	Firefighting policies, PN717, PN867, Togetherness Strategy, EDI policies PN0973, PN0965
Additional comments	

<b>3. EIA owner</b>	
Name of EIA lead author	Daniel Kipling
Department and Team	Learning and Professional Development
Have you attended an EIA Workshop	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Name of EIA owner (responsible for signoff)	

## 4. Assessment

<b>Generic considerations</b>	<p>This is a residential course, so this will have more of an impact on certain staff groups. However, it will also improve firefighter safety and effectiveness at incidents, and provides a range of opportunities for staff and members of the public. This course is likely to result in saving the lives and properties of Londoners more efficiently.</p>
<b>Wellbeing considerations</b> <i>Consider how this piece of work may impact the physical and mental wellbeing of staff and/or the communities in London?</i>	<p>Attending a residential course outside of London has implications for attendees with caring responsibilities, or other personal matters that require them to be at home outside of work. The course is also a physically demanding course, which exposes firefighters to real fire.</p>
<b>Possible opportunities</b> <i>Consider how this piece of work may contribute to improving the efficiency/effectiveness/culture of the organisation?</i>	<p>Delivering this training course will improve LFB's response to fires by upskilling staff in modern firefighting tactics and technologies. This means communities will receive a more effective and efficient response. Improved firefighter training also has a significant impact on the professionalisation of the service, which is critical to the cultural change LFB is currently undergoing. Investment in real fire training for staff is totemic and a statement of our desire to change as an organisation.</p>

## 5. Impacts on groups protected **under** the Equality Act 2010

<b>SEX</b> (how might men and women be affected differently by your activity, project or policy?)	
<b>Assessment of Impact:</b>  <p>Analysis of data indicates that this proposal impacts men proportionately more than women, because men make up 89.7% of LFB's operational workforce. However, 2021 census data has found that women are proportionately more likely to be primary carers (59%), so a residential course is likely to disproportionately impact on women.</p>	<input type="checkbox"/> High impact <input checked="" type="checkbox"/> Medium impact <input type="checkbox"/> Low impact

<p>This proposal will make firefighters more effective at dwelling fires, improving their ability to create safe conditions at these incident types for people in need of rescue. Males are statistically more likely to die in fires in England – at 5.9 deaths per million population compared to 3.3 for females. Therefore this will proportionately positively benefit male members of public.</p>	<p><input type="checkbox"/> Opportunities</p> <p><b>Information used in assessment:</b>  <i>PowerBi</i>  <i>Census data</i>  <i>Gov.uk fire deaths statistics</i></p>
<p><b>Consultation</b>  <i>This paper secures funding for the course – full consultation with ESGs must take place as part of the course design, which will be subject to a separate EIA</i></p>	

<p><b>RACE</b> (including nationality, colour, national and/or ethnic origins - what are the ethnicities of the staff or community members who are likely to come into contact with your activity, project or policy? E.g., there are a disproportionate number of BAME staff at junior grades at LFB, does this proposal affect junior staff more? Does this policy/project/proposal affect anything where inequalities have been identified? E.g. COVID-19, low income professions, health or social inequality?)</p>	
<p><b>Assessment of Impact:</b>          Firefighters through to level one officers are the largest group affected by this strategy, and within that group there is a larger percentage of ethnic minority individuals than the other operational staff groups. Therefore, by virtue of the staff groups that make up of LFB's operational workforce, this proposal impacts staff from ethnic minority backgrounds proportionately more than other staff groups.</p> <p>This is both adverse and positive. The purpose of this course is to improve the training provision to operational staff so that they are more effective and safer at fires. This would be deemed a positive impact. Whilst ethnic minority groups are underrepresented in LFB, at Firefighter through to Level 1 officer (the main staff group this affects) there are proportionately more ethnic minority staff members than the other operational levels.</p> <p>There may therefore be a disproportionate impact on this staff group because there will be a requirement to travel outside of London to attend this course (currently scheduled to be one two day course every two years), but this is not believed to be adverse.</p>	<p><input type="checkbox"/> High impact  <input type="checkbox"/> Medium impact  <input checked="" type="checkbox"/> Low impact  <input type="checkbox"/> Opportunities</p> <p><b>Information used in assessment:</b>  <i>PowerBi</i></p>

<p><b>Consultation</b> <i>This paper secures funding for the course – full consultation with ESGs must take place as part of the course design, which will be subject to a separate EIA</i></p>	
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<p><b>AGE</b> (please refer to specific age group, and avoid using generic terms like 'younger' or 'older' - <i>will a particular age group be affected -i.e. does it relate to youth services, or pensions? e.g. This proposal will disproportionately impact one team in X department, as everyone in this team is over the age of 55</i>).</p>	
<p><b>Assessment of Impact:</b></p> <p>As training material is developed it must be done so in such a way that is not disadvantageous to this group who may have needs as a function of older age (for example using different learning styles, considering visual and hearing aids during practical training). In London, the average age of a firefighter is 41, with the largest proportion of the workforce in the 36-45 year age range (40%), with 66% under 46. Therefore it is this age group which is proportionately more impacted by the course being a residential course.</p> <p>This strategy will have a positive impact on this characteristic in the communities that we serve, by virtue of the fact that its delivery will make LFB staff more effective at operational incidents. A key element of the strategy will be to improve operational staff understanding of fire behaviour, which in turn will increase effectiveness in saving life. Those members of the community who, as a function of their age, are less mobile or more likely to require rescue in fire situations (both young and old) will be positively impacted by a more effective response.</p> <p>The likelihood of dying in a fire generally increases with age. In the year ending March 2023, 47% of all fire-related deaths in England were in people aged over 65, and this is a broadly consistent rate across previous years. In England, people aged 80 and over are the most likely to die from fires, at 16.4 deaths per million population. This is also the case for fire-related non-fatal casualties. This is as opposed to 4.7 for all ages. Therefore this will positively impact on this age group because the proposal will improve firefighter effectiveness at fires.</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> High impact</li> <li><input type="checkbox"/> Medium impact</li> <li><input checked="" type="checkbox"/> Low impact</li> <li><input checked="" type="checkbox"/> Opportunities</li> </ul> <p><b>Information used in assessment: Information used in assessment:</b> PowerBi Gov.uk fire death statistics Gov.uk Fire Statistics</p>



<p><b>Consultation</b> <i>This paper secures funding for the course – full consultation with ESGs must take place as part of the course design, which will be subject to a separate EIA</i></p>	
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<p><b>SEXUAL ORIENTATION</b> (applies to lesbian gay, bisexual and heterosexual people - Does your activity, project or policy involve employees or communities disclosing any information about their family or living situation?)</p>	
<p><b>Assessment of Impact:</b>  This proposal does not directly impact this group, however appropriate measures will be put in place to ensure people in this group are not adversely affected through any part of the training programme.</p>	<p><b>Information used in assessment: Information used in assessment:</b></p>
<p><b>Consultation</b> <i>This paper secures funding for the course – full consultation with ESGs must take place as part of the course design, which will be subject to a separate EIA</i></p>	<p> <input type="checkbox"/> High risk  <input type="checkbox"/> Medium risk  <input checked="" type="checkbox"/> Low risk  <input type="checkbox"/> Opportunities         </p>

<p><b>DISABILITY</b> (physical, sensory, mental health, learning disability, long term illness, hidden - what measures will you put in place to make sure policies are accessible to employees with a learning disability, or who are neurodiverse be able to access this policy easily? How will you evaluate this? What steps have you taken to make sure your activity or practice is accessible to those with physical impairments? If using stations or buildings, are these accessible?)</p>	
<p><b>Assessment of Impact:</b>  This paper provides an opportunity to positively impact on Neurodiverse staff because, following securing of funding for this course, there is an opportunity to give consideration to different learning needs during the development of course material. Whilst physical disabilities for operational staff should be considered in the EIAs for individual equipment items, they must also be taken into account when developing the training that falls out of this funding.</p>	<p> <input type="checkbox"/> High impact  <input type="checkbox"/> Medium impact  <input type="checkbox"/> Low impact  <input checked="" type="checkbox"/> Opportunities         </p> <p><b>Information used in assessment: Information used in assessment:</b></p>

<p>As with age characteristics, this strategy will have a positive impact on disabilities in the communities that we serve, by virtue of the fact that its delivery will make LFB staff more effective. A key element of the strategy will be to improve operational staff understanding of fire behaviour, which in turn will increase effectiveness in saving life. Those members of the community who, as a function of their disability, are less mobile or more likely to require rescue in fire situations will be positively impacted by a more effective response.</p>	
<p><b>Consultation</b> <i>This paper secures funding for the course – full consultation with ESGs must take place as part of the course design, which will be subject to a separate EIA</i></p>	

<p><b>RELIGION OR BELIEF</b> (people of any religion, or no religion, or people who follow a particular belief - does this proposal affect things like uniform, appearance, or facilities?)</p>	
<p><b>Assessment of Impact:</b> Whilst the bid for funding doesn't directly impact on this group, there is an opportunity in the design of the course to make mitigations for religious groups who require prayer time, or provisions around equipment and PPE.</p>	<p> <input type="checkbox"/> High impact  <input type="checkbox"/> Medium impact  <input type="checkbox"/> Low impact  <input checked="" type="checkbox"/> Opportunities         </p>
<p><b>Consultation</b> <i>This paper secures funding for the course – full consultation with ESGs must take place as part of the course design, which will be subject to a separate EIA</i></p>	<p><b>Information used in assessment: Information used in assessment:</b></p>

<p><b>MARRIAGE / CIVIL PARTNERSHIP</b> (married as well as same-sex couples does this activity, policy or practice require information about people's marriage or civil partnership status, if so is this necessary and justifiable?)</p>	
<p><b>Assessment of Impact:</b></p>	<p><input type="checkbox"/> High impact</p>

<p>This proposal has a low impact on this characteristic – however mitigations will be put in place for the low impact such as 28 days' notice to support work/life balance, and where possible running the course across day shifts to minimise the impact of a residential course.</p>	<p><input type="checkbox"/> Medium impact  <input type="checkbox"/> Low impact  <input checked="" type="checkbox"/> Opportunities</p>
<p><b>Consultation</b>  <i>This paper secures funding for the course – full consultation with ESGs must take place as part of the course design, which will be subject to a separate EIA</i></p>	<p><b>Information used in assessment: Information used in assessment:</b></p>

<p><b>PREGNANCY AND MATERNITY</b> (in what way may your activity, project or policy impact (or potentially exclude) pregnant staff or those on maternity leave? How will they access this policy if they need to?)</p>	
<p><b>Assessment of Impact:</b>  The course for which this funding is intended will place firefighters in challenging real fire environments. This type of training cannot be undertaken by pregnant people or those on maternity. Therefore this will require mitigation as part of the return to operational duties process.</p> <p>As with other groups, there is a positive impact for communities containing these groups because these groups may be more vulnerable to the effects of fire, particularly during post fire recovery. The development and review of training for firefighters will make operational staff more effective, and therefore improve effectiveness during rescue operations.</p>	<p><input type="checkbox"/> High impact  <input type="checkbox"/> Medium impact  <input checked="" type="checkbox"/> Low impact  <input checked="" type="checkbox"/> Opportunities</p> <p><b>Information used in assessment:</b></p>
<p><b>Consultation</b>  <i>This paper secures funding for the course – full consultation with ESGs must take place as part of the course design, which will be subject to a separate EIA</i></p>	

<p><b>GENDER REASSIGNMENT</b> (someone proposing to/undergoing/ undergone a transition from one gender to another or who identifies as non-binary)</p>
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<p><b>Assessment of Impact:</b> Part of this strategy requires the assessment and review of training venues. Whilst in some cases the facilities are outside the scope of this project (i.e. Fire Stations), elements of this strategy will include the development of new training venues, and redevelopment of some new venues. This represents an opportunity to provide gender neutral facilities, but also review provision in the context of accessibility to this group.</p>	<p><input type="checkbox"/> High impact <input type="checkbox"/> Medium impact <input type="checkbox"/> Low impact <input checked="" type="checkbox"/> Opportunities</p>
<p><b>Consultation</b> <i>This paper secures funding for the course – full consultation with ESGs must take place as part of the course design, which will be subject to a separate EIA</i></p>	<p><b>Information used in assessment:</b></p>

## 6. Impacts on groups **outside** the Equality Act 2010

<p><b>Consider the impact on: carers, parents, care leavers, ex-offenders, people living in areas of disadvantage, homeless people, people on low income / in poverty.</b></p>
<p>2021 Census data found that 75% of carers in employment worry about continuing to juggle work and care. Therefore this group will need to be considered in the design of the course to maintain normal working patterns where possible, and introduce flexibility.</p>

<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> <i>This box is about any direct/ indirect discrimination, considerations where bias may impact decisions/delivery, how to make processes avoid discrimination etc.</i></p>	<p>It is anticipated that the development and implementation of this course will have an overall positive impact across all staff groups (albeit primarily firefighter through to level two officer) as well as the relevant characteristics in the community identified above.</p>
<p><b>Advance equality of opportunity between different groups?</b> <i>This box is about positive action – how can you improve communication between protected characteristic groups, access, education, furthering work in communities to support them etc?</i></p>	<p>The strategy is intended to improve outcomes relating to health, safety and wellbeing management for all staff on the incident ground and this includes staff in underrepresented groups as highlighted above in this EIA.</p>
<p><b>Foster good relations between different groups?</b> <i>This box is about working with ESGs, and community groups (internal and external)</i></p>	<p>This EIA has been developed at the outset of this project in order to secure funding to develop a course. The design of the course must be subject to consultation with heads of department, equality support groups and representative bodies, which will be recorded in a separate EIA prior to the launch of the course.</p>

<b>8. Mitigating and justifying impacts</b> (where an adverse impact has been identified, please record the steps that are being taken to mitigate or justify it?)		
<b>Protected characteristic and potential adverse impact</b>	<b>Action being taken to mitigate or justify</b>	<b>Lead person responsible for action</b>
Age	28 days' notice for course attendance, course run on day shifts where possible, training provider to deliver accessible training materials. Accommodation provided night before.	Daniel Kipling
Sex	28 days' notice for course attendance, course run on day shifts where possible, training provider to deliver accessible training materials. Accommodation provided night before.	Daniel Kipling

Disability	Training provider will be required to develop accessible training materials.	Daniel Kipling
Gender Re-assignment	Gender neutral facilities to be provided	Daniel Kipling
Pregnancy and maternity	Staff returning from maternity to be provided two-day advanced fire behaviour course to prepare for full PPV course.	Daniel Kipling
Race	Opportunity to explore mitigations in PPE for staff requiring adjustments for religion, and to design the course to make allowances for requirements of worship.	Daniel Kipling
Marriage/civil partnership	28 days' notice for course attendance, course run on day shifts where possible, training provider to deliver accessible training materials. Accommodation provided night before.	Daniel Kipling

<b>9. Follow up actions and evaluation</b> (where contributors have recommended <b>specific actions</b> to demonstrate due regard, these must be recorded here and delivered in accordance with time scales. These actions will be monitored and outcomes evaluated by the Inclusion team who will report to various stakeholders such as the leadership team, trade unions and ESGs).		
<b>Action recommended and person responsible for delivery</b>	<b>Target date Action to be completed by</b>	<b>Date action completed</b>
Design of the course this paper secures funding for must be subject to a separate EIA which relates to the course specifics	April 2024	

**For completion by Inclusion team:**

## Document Control

**RAG rating:** *Overall Equality Impact of this policy, project, decision or activity*



**High:** Evidence of significant adverse impact. This activity should be stopped until further work is done to mitigate the impact.

**Medium:** Some potential adverse impact against one or more groups. The risk of impact may be removed or reduced by implementing the mitigating activities below.

**Low:** No adverse impacts have been identified



**Review date:**

<b>Lessons learnt and evaluation</b>			
Signed (lead for EIA / action plan)		Date	
Sign off by Inclusion Team		Date	
Linked policies/EIAs			

## Appendix 1: Fire behaviour findings from firefighter fatality and Senior Accident Investigations

This table outlines the Rule 43 coroner's recommendations related to fire behaviour following a UK firefighter fatality since 2009. It also includes the recommendations from Senior Accident Investigations within LFB related to fire behaviour.

Date	Location	Incident	Findings
12 July 2009	Balmoral Bar, Edinburgh	Firefighter fatality	Scotland Fire and Rescue Service (SFRS) were fined for breaches of the Health and Safety at Work etc Act (1974) for failing to adequately monitor and record firefighter training, and to adequately train firefighters in BA operations. This led to SFRS introducing tactical ventilation training and develop a three-yearly fire behaviour course in line with national standards.
6 April 2010	Shirley Towers, Hampshire	Two firefighter fatalities	The coroner's rule 43 letter recommended a review of firefighter training on techniques for cooling compartment fires, tactical ventilation, search patterns and proceeding past the fire.
8 <sup>th</sup> January 2011	89 East Hill, Wandsworth	Four firefighters injured	SAI report recommended a fundamental review of BA training to ensure compartment firefighting policy is captured, as well as a review of training on weight of attack, water application techniques, compartment entry and maintaining escape routes.
11 <sup>th</sup> August 2012	Spirit Men's and ladieswear, Ilford	Four firefighters injured	SAI report found that incorrect weight of attack was in place to protect BA teams. BA team remained in compartment that was excessively hot, where flashover and/or backdraught conditions existed. There was a failure to recognise the signs and symptoms of backdraught conditions, leading to ineffective execution of firefighting tactics.
13 July 2013	Paul's Hair and Beauty World, Manchester	Firefighter fatality	<p>Coroner's recommendation:            Training and guidance for all operational personnel to recognise the effects of heat both on themselves and on their colleagues and the appropriate steps to take upon such recognition, including withdrawal and self-withdrawal.</p> <p>Review training in the appropriate use of thermal imaging cameras to include the limited extent to which they can be relied upon to measure ambient temperature.</p>

26 November 2013	Harding's Newsagent, Tottenham	Two firefighters injured	SAI report found the assessment of weight of attack to deal with fire conditions was insufficient. The firefighting tactics selected were not sufficient to protect firefighters from fire conditions. Thermal imaging cameras were not used to their full potential. Incorrect use of covering jet appeared to accelerate conditions for flashover.
23 December 2017	London Zoo, London	Four firefighters, one watch manager, one group manager injured.	SAI report found that the <i>'hazard presented by the unburnt products of a fire were not understood by those dealing with the fire.'</i> It recommended training was reviewed to ensure firefighters' ability to recognise the hazards such as fire development is sufficient. This included indications from smoke conditions and the risk posed by fire gases in roof spaces and voids. It also recommended a review of training provided in tactical ventilation, thermal imagery, weight of attack and covering jets

In London there have been a number of significant incidents where subsequent investigations have made recommendations for the improvement of training. The Grenfell Inquiry recommended that LFB 'develop policies and training to ensure better deployments and use of resources' and 'that all fire and rescue services ensure that their personnel at all levels understand the risk of fire taking hold in the external walls of high-rise buildings and know how to recognise it when it occur'.

The Lakanal House Rule 43 letter to the LFB recommended training on 'to anticipate that a fire might behave in a manner inconsistent with the compartmentation principle and 'to be aware of the risks to those above and adjacent to the fire flat'.

The deaths of two firefighters on 20<sup>th</sup> July 2004 at 419 Bethnal Green Road was, in part, attributed by the serious accident investigation to an insufficient understanding of the firespread potential of burning materials. It went on to recommend more effective real fire training, in particular around flashover, backdraught and tactical ventilation.

## Appendix 2: LFB Corporate Risks mitigated by Urban Firefighting

Risk ID	Risk Description	Likelihood	Impact	Score	How Urban Firefighting Course mitigates this risk
FSN11	Failure to achieve minimum service standards delivery places the wider community at risk and damages the reputation of the Brigade	3	5	15	Delivers a training venue which allows training on full range of N.O.G training specification
GT2	Failure to identify organisational learning through investigation and review of the LFB's response to the Grenfell Tower fire means that poor performance is repeated in the future exposing staff and public to unacceptable safety hazards	2	3	6	Urban Firefighting Course provides training facilities and content which responds to recommendations of GT1 and is the vehicle to sustain change.
GT7	The Grenfell Tower Public Inquiry results in further conclusions about Brigade policies or actions which reduce staff or public confidence	2	3	6	Urban Firefighting Course will launch in April '24, responding to anticipated recommendations from Phase 2.
HS1	The Brigade's leadership is not sufficiently focused on delivering an effective and improving safety culture to prevent injuries and ill health	3	4	12	Investing in risk critical staff training, and providing modern techniques and technologies demonstrates a commitment to a health and safety culture
OP2	Failure to identify high impact, low frequency events and train for them which exposes the safety of our staff their competence to deal with them	3	5	15	A modern, flexible training facility provides the vehicle to train staff on incident types which replicate the complexity and scale of the risk in London.
OP7	In an emergent and unregulated alternative fuels market, the Brigade is unable to keep pace with new fire and rescue responses to alternative fuel technology applications, complex fire dynamics and commercial uptake which potentially exposes the safety of our staff and the public at incidents	4	5	20	In order to test and train on new and emergent risks, LFB must have access to a training venue which is flexible and able to recreate realistic conditions.
P1	Lack of support afforded to trainees during their apprenticeships leaves trainees isolated from the Brigade and at risk from harm, from the start of their career journey at training school through to end point assessment	3	5	15	Urban Firefighting Course provides a two day advanced fire behaviour course for trainees so they are better prepared for station life.

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