

Full Equality Impact Assessment (EIA) Form

When completing this form please use the [EIA guidance notes](#) and check our other resources on our dedicated [EIA Hotwire pages](#)

Part one

You will only be required to complete a full EIA assessment if:

- a) as a result of completing the initial screening form, potential adverse impacts have been identified in an area of your activity requiring adjustments

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

- a) eliminate discrimination, harassment, and victimisation;
- b) advance equality of opportunity; and,
- c) foster good relations between people who share a relevant protected characteristic and people who do not share it.

In your full EIA, you are only required to complete an assessment of any negative impacts that has been identified against any protected characteristics. Any positive impacts should be fully explained in the initial screening form. You must be able to show that your activity meets the three conditions of the due regard by providing relevant information to show how it caters for people with protected characteristics (where applicable), through eliminating potential discrimination and promoting opportunities to build equity between all groups.

A. Summary of EIA

Annual Review of Assessment of Risk 2025

The Brigade's Assessment of Risk (AoR) underpins the Community Risk Management Plan (CRMP), and the six service strategies that have their basis in the CRMP; Prevent, Protect, Respond, Prepare, Recover and Engage. The AoR is intended to support a common understanding of operational risk across services and departments. Annual review of the AoR is used to inform departmental planning, production of business cases and in local risk management plans and reviews of service strategies and the CRMP.

This EIA relates to the process used to update the AoR for 2025

The review of the AoR in 2025 retains the layered structure and method proposed in the paper, "Proposed Process; Assessment of Risk 2024" presented to Commissioners Board in October

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2023. Because of the different types of risk that LFB must prepare for and respond to the AoR presents different types of risks as, “layers”. A layered structure allows specific risk types to be highlighted separately and presented in the most appropriate way for the end user of the risk information

Layers are outlined below.

Layer One. Public Concerns and Public Risk Perception. This layer identifies the risks that Londoners are most concerned about in relation to fire and rescue service-related emergencies. These concerns will not necessarily reflect the likelihood or severity of actual incidents but reflect the concerns held by members of the public.

The purpose of this layer is to:

- Establish the primary concerns of the public as they relate to the fire service.
- Inform risk communication work and public engagement.
- Allow public concerns to be considered when setting organisational risk priorities.
- Use the lived experience of communities to inform Hazard Identification.

There is a need to produce a simple and repeatable measure of public risk perception that can be used to track changes year on year and to highlight any differences in risk perception or concern between different geographies or demographics. It is proposed to collect this data through planned engagement with the public. The tool for data collection is Mentimeter, along with qualitative data collected from community engagement activities. The expected outcome is the identification and measurement of the public perception of risk across London.

Layer 2. Risks relating to property, place and incident type. This is a data-led risk assessment using the most recent five calendar years of incident data on casualties and of demand on LFB resources at incidents. This layer highlights risks which are relatively common under normal requirements. This layer highlights the type of incidents and locations associated with high likelihood of casualties (e.g. road traffic accidents and domestic fires) and of larger draws on resources (e.g. fires in rural areas). The purpose of this layer is to:

- Assess which property types and locations and which incident types are associated with the most casualties under normal requirements.
- To assess which property types and locations and which incident types, have the potential for the greatest wider impacts and resourcing implications for LFB under normal requirements.

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- To inform prioritisation work within LFB service strategies.

Layer 3.1: Extraordinary risks and risks from the London Risk Register. This is a risk assessment of rare or “worst-case” scenarios which may not occur with sufficient frequency to appear in LFB incident data or are yet to have occurred. Worst-case risks are assessed against a range of impacts e.g., human welfare, behavioral impact, economic, infrastructure, environmental and security. Risks are taken directly from the London Risk Register (LRR), produced by the London Resilience Forum (LRF).

Layer 3.2: Extraordinary risk scenario modelling. Modelling in this section is a development of the existing optimisation model and dynamic cover tool. This layer provides an operational stress test for reasonable worst-case scenarios under differing demand conditions. The purpose layers 3.1 and 3.2 is to allow the Brigade to plan and prepare for:

- Response to low frequency but high impact events.
- Plan for combinations of events leading to a high overall demand on LFB resources.

Layer 4: New and Emerging Risks. This layer describes trends identified in incident data and the outcomes of workshops undertaken throughout early 2025. These workshops drew together the Brigade’s various sources of expertise, information and horizon scanning functions to identify early warning signs of changes to risk or to the operating environment that may not yet be apparent in incident data or existing risk registers, but which have been identified by Brigade subject matter experts and policy owners. This allows for longer term planning to be undertaken and controls to be identified in the early stages of a risk’s development. The purpose of this layer is:

- To gather information about emerging trends and developments that could have an impact on the Brigade.
- To explore how these trends and developments might combine and what impact they might have.
- To involve a range of people in futures thinking. To increase the knowledge and insight within LFB about new and emerging risks relevant to LFB operations.
- To develop a shared understanding of emerging risk across the Brigade’s various functions and departments.

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The reason for an EIA is to review the EIA, to ensure it remains current, suitable and sufficient. It should be noted that there has been no change to the previous AoR methodology.

B. Team responsible for the activity

EIA Author(s):

Name: Thomas Ronan

Job title: Station Commander Strategic Planning

Department: Transformation

EIA Owner(s) - individual in charge of the overall activity:

Name: Thomas Ronan

Job title: Station Commander Strategic Planning

Department: Transformation

Name: Susan Ellison-Bunce

Job title: Assistant Director Strategic Planning

Department: Transformation

C. What supporting policies/documents are relevant to this EIA? (Please hyperlink each document, policy, and guideline referenced below)

Assessment of Risk 2024 – <https://www.london-fire.gov.uk/media/3axbqf1e/lfc-24-082-assessment-of-risk-2024-report-and-appendices-for-publishing.pdf>

Community Risk Management Plan; Your London Fire Brigade - <https://www.london-fire.gov.uk/about-us/your-london-fire-brigade-our-plan-for-2023-29/>

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D. Equality and diversity considerations

Describe the ways your activity is anticipated to disproportionately affect any groups with a protected characteristic listed under the Equality Act 2010.

You must make sure to list any sources you have used to complete your analysis.

Do not provide databases, graphs, or tables in this section. Just key findings and the outcomes of your learning about these different groups.

The below paragraphs apply to all characteristics listed in this section

The exposure of individual members of the public to various risks will differ significantly with their location and activity, this exposure may be correlated or independent to any individual protected characteristic. The layered approach adopted to assessing risk ensures that each type of risk an individual may be exposed to, for whatever reason, is assessed allowing mitigation to be planned.

The NFCC have developed a national approach to assessing risk for dwelling fires and road traffic collisions. The AoR adopts this approach as a means of identifying geographic areas across London most likely to be associated with higher risk. The findings of the NFCC work indicate that some of the key factors linked to likelihood of dwelling fires include car or home ownership, (un)employment, deprivation, property type and tenure. Similar factors are associated with consequence; however, these differ for life and property consequences, and neither provide robust predictions as for likelihood. Individually, the correlated factors that have been identified do not necessarily contribute to higher risk, however, when considered collectively, these factors can be used to identify areas that are statistically more likely to contain people who are higher risk. Using the NFCC methodology ensures that a robust approach to dwelling fire risk is adopted. Any risks associated with protected characteristics whilst not directly addressed in the NFCC work is addressed through the including and aggregation of the identified factors that correlate with likelihood and consequence of a fire.

Key factors associated with risk on individual road segments include: Road class and type Urban/rural category (based on ONS data) Speed limit data (from Basemap Ltd) Values for Likelihood Values for Consequence RTC risk score and category (H/M/L). The AoR uses the NFCC methodology to map RTC risk onto London road maps.

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Because key factors associated with dwelling fire and RTC risk are included in the NFCC definition of risk work and mapped pan London for the AoR, data sets on individual personal vulnerability are not assessed separately within the AoR document.

Specific individual personal vulnerability data sets are used by the prevention team when planning the allocation of Home Fire Safety Visits and other prevention work. This process is outlined in LFB Policy 1010.

Because individuals may experience or perceive risk uniquely as a function of their lived experience, and because this may differ from assessments made using historical incident data, 2024s assessment of risk includes as its first layer, Public Concerns and Public Risk Perception. This layer identifies the risks that Londoners are most concerned about in relation to fire and rescue service-related emergencies. These concerns will not necessarily reflect the likelihood or severity of actual incidents but reflect the concerns held by members of the public.

The purpose of this layer is to:

- Establish the primary concerns of the public as they relate to the fire service.
- Inform risk communication work and public engagement.
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- Use the lived experience of communities to inform Hazard Identification.

By including this layer any experience of risk that falls outside the data based assessment can be assessed.

Layer one has a separate EIA in appendix five of the Assessment of Risk 2024.

Age

The 2021 census showed that 24% of London residents are aged 19 and under, and 12% are aged 65 and over.

Sources used: [Census 2021](#)

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Disability

The 2021 census showed that 16% of London residents identified themselves as disabled, with 5% of households having two or more disabled people/people with disabilities.

Sources used: [Census 2021](#)

Gender reassignment

The 2021 census showed that 1% of London residents identified with a gender different to that which they were assigned at birth.

Sources used: [Census 2021](#)

Marriage or civil partnership

It is unlikely that persons in a marriage and civil partnership could be disproportionately impacted by risk assessment activity. However, in designing the engagement for layer one it must be ensured that it won't exclude this group in any way.

Sources used:

Pregnancy and maternity

Persons experiencing pregnancy and maternity may have specific perceptions of risk related to this.

Sources used:

Race

The 2021 census showed that 37% of London's population identifies as White British, with White groups making up a total of 54% of London's population. Of the remaining 46%, Asian groups made up 21%, Black groups 14%, Mixed groups 6%, and other ethnic groups 6%. In addition, 22% of London residents spoke a main language other than English, and for 4% of London residents they reported not being able to speak English well at all. Further, 41% of London's population was born outside of the UK.

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Sources used: [Census 2021](#)

Religion or belief

The 2021 census showed that 40% of London residents are Christian, 15% Muslim, 5% Hindu, 2% Jewish, 2% Sikh, 1% Buddhist, and 1% other religion, with 27% reporting that they do not have a religion. In addition, these numbers were often concentrated in boroughs – for example, 40% of residents in Tower Hamlets are Muslim, 14% of residents in Barnet are Jewish, and 25% of residents in Harrow are Hindu.

Sources used: [Census 2021](#)

Sexual orientation

The 2021 census showed that 4.8% of London residents identified as LGB+, with a lower proportion of people identifying as heterosexual in London compared with the rest of England.

Sources used: [Census 2021](#)

Socioeconomic backgrounds

The 2021 census showed that just over half of all households in London are deprived on at least one dimension, with 13,000 households showing all aspects of deprivation (across four dimensions) – a higher proportion than any other region in England.

Sources used: [Census 2021](#)

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Caring responsibilities

The 2021 census showed that 8% of London residents provide unpaid care to someone in their lives.

Sources used: [Census 2021](#)

E. Evidencing Impact: please answer the following:

E. (a) List all stakeholders and organisations (internal/external) you have consulted or contacted regarding your activity, making sure to seek feedback from groups that may be the most impacted by the activity.

External stakeholders

1. YouGov polling was undertaken with approximately 1000 members of the community representing a wide cross section of ages, ethnicities, religions.
2. Expert Review Panel (consisting of academics, members of London Resilience Group, and external members of the fire sector).
3. Community engagement sessions
Between November 2024 to March 2025 London Fire Brigade's Community Engagement team, Strategic Planning team and a number of borough teams, will hold 15 focus groups on the public perception of risk. Groups given the opportunity to feedback on the AoR 2024 process, included:
 - LFB Community Forum
 - Christian Family Concern
 - Board of Deputies of British Jews
 - London Councils Community Engagement Network
 - London Resilience group
 - Kensington and Chelsea Over 50s Forum
 - GLA Deaf and Disabled People's Organisations group
 - Pollards Hill Youth Centre
 - Open public session

Internal Stakeholders

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	<p>Internal staff focus groups will be held to gather views of staff perception. The groups to be consulted included:</p> <ul style="list-style-type: none"> • Control staff • Operational Sounding Board • Fire Stations • Layer 4 workshops.
<p>(b) Explain the insights gained, how you have/will evaluate and whether you intend seek post-activity feedback from those stakeholders/organisations?</p>	<p>Feedback was sought from External academics with regards the robustness and defensibility of the methodology. A statement of support was provided for the approach.</p> <p>With regards to the Layer 1 process, insights were gained on the language used in the sessions, the explanations and examples given of risk types, any the additional fire safety information that people would appreciate receiving. All participants were given the opportunity to provide post-session feedback, but we only received it from some attendees.</p>
<p>F. Clearly record any gaps in evidence which has limited this assessment being completed in full.</p> <p>I.e. Was there any information or data you were unable to find/collect?</p> <p>Consider whether you can justify continuing the activity without this information, or if a mitigating action plan is required?</p>	<p>We did not identify any gaps limiting the EIA being completed in full. This activity is iterative, so it is completed annually but can develop based on feedback and learnings from the previous year.</p>
<p>G. Clearly record the following:</p>	<p>Although not primally a risk communication tool, when published the AoR will be available as a PDF with alternative text provided for charts and tables. This will</p>

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<ul style="list-style-type: none"> List any adjustments you will be putting in place for people with protected characteristics. Use each characteristic as a sub-heading, and any activity to promote equity of access, opportunity, experience and outcomes? 	<p>make it accessible to users with automated reading software.</p> <p>The points below mainly refer to activities associated with Layer 1 of the AoR (a separate EIA exists for the AoR Layer 1):</p> <ul style="list-style-type: none"> Age – simple and accessible language, use of both print and digital resources, offer of both online and in-person sessions. Disability – online and in-person sessions offered, reasonable adjustments available on request (i.e., BSL interpretation) Race – offer of translation / interpretation on request Religion – timing and location take into account religious holidays and times Socioeconomic – engagement at zero cost where possible – online sessions to improve access, and offer to refund expenses
<p>H. Clearly record how you will communicate the activity to those involved, especially if their protected characteristic may be a factor. You may need to consider diverse formats such as audio, large print, easy read, and other accessibility options in various materials?</p> <p>Please ensure you utilise and reference the below documentation:</p> <p>Inclusive and Accessible Documents for Neurodivergent Individuals - Tips and Resources 2024.pdf</p>	<p>The AoR is intended to be used primarily as a technical document by LFB staff to direct and prioritise work. It is available to the public, but it is acknowledged that due to it's complexity it is not intended to be a public risk communication tool.</p> <p>Teams involved in direct risk communication work with the public should refer to the AoR when planning and prioritising their communication but use appropriate tools for the specific audience they are communicating with.</p> <p>When published, the AoR will be in a PDF format with alternative text for images and charts to allow accessibility to those members of the public choosing to engage with the document.</p> <p>The Layer 1 activity is primarily communicated directly to groups invited to take part (on the basis of the EIA, and of risks identified by LFB). This can be email, phone, or in-person, dependent on preference. The session is then</p>

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The-LFB-key-EDI-terminology2024.pdf	<p>communicated to members of the group on the basis of how they usually receive communications, with any adjustments already in place.</p> <p>For the session itself, we take advice from each group on accessibility needs of the group, and any specific communication needs there may be – such as print copies, interpretation, etc.</p>
I. 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	Action being taken to mitigate or justify
1. Age – the activity (Layer 1 specifically) is inaccessible for older persons or young persons	The language used will be simple and accessible, help and assistance will be available where required, and there will be multiple ways to participate in the engagement to avoid exclusion.
2. Disability – the activity (Layer 1 specifically) is inaccessible for people with disabilities	Varying methods of engagement will be considered where necessary, alternative materials for visual/hearing impairments will be available upon request, and the presentation of information will be considered for neurodiverse accessibility.
3. Race (including ethnicity and nationality) – the activity (Layer 1 specifically) is inaccessible/exclusionary for certain ethnic groups	Information may be provided in different languages if requested, the activity will be advertised in a variety of spaces catering to different groups, and engagement will be offered at varying times/places.
4. Religion – the activity (Layer 1 specifically) is inaccessible/exclusionary for people of certain religions.	The time and day of the engagement will be considered, and if in-person the location of the engagement and the facilities available (such as private spaces, prayer rooms, etc.) will be taken into account.
5. Socioeconomic backgrounds (Layer 1 specifically)	Varying options for engagement will be considered, taking into account time and place. The engagement will be advertised in a range of different places.
To be completed by the Inclusion Team	
Review date:	

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Part two: Inclusion team to complete - feedback and recommendations

J. EIA Outcomes

☐ **Recommendation 2:**

Adverse impact(s) identified - activity continues with agreed justification or mitigation in place

☐ **Recommendation 3:**

Adverse impact(s) identified - activity paused until justification or mitigation provided

☐ **Recommendation 4:**

Adverse impact(s) identified - activity paused due to potentially unlawful or adverse effects which cannot be reasonable justified/mitigated.

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.

Name: [text here] Sign-off Date: [text here]	[text to be completed by the EIA Team]
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