



LONDON FIRE BRIGADE

LFC-24-039

Annual Fitness Testing

Report to:

Service Delivery Board
Commissioner's Board
Deputy Mayor's Fire and Resilience Board
London Fire Commissioner

Date:

10 April 2024
17 April 2024
30 April 2024

Report by:

Assistant Commissioner for Fire Stations

Report classification:

For decision

For publication

I agree the recommended decision below.

Andy Roe

London Fire Commissioner

Date This decision was remotely
signed on 17 May 2024

PART ONE

Non-confidential facts and advice to the decision-maker

Executive Summary

LFB does not currently have a programme of periodic fitness testing and has limited assurance that operational staff meet the standards required to be safe and effective in their roles, in accordance with national guidance.

This note sets out a plan for the phased implementation of Annual Fitness Testing (AFT) for all operational staff, including a cultural change initiative to support staff in the commitment to regular exercise necessary to meet and maintain the standards required.

Recommended decisions

For the London Fire Commissioner

That the London Fire Commissioner:

Delegates authority to the Assistant Commissioner for Fire Stations to:

1. Implement the introduction of Annual Fitness Testing for all operational staff in line with the recommendations detailed within this report making any modification as required following consultation with the representative bodies, staff groups and General Counsel,
2. Amend policy 935 as required to effect recommendation 1 of this report, and
3. Commence a sourcing exercise for the specified equipment in this report.

1 Introduction and background

- 1.1.** In 2016 the Home Office/ National Joint Council for Local Authority Fire & Rescue Services (the Secretariat comprising the LGA and the FBU) published the 'Firefighter Fitness Best Practice Guide', detailing best practice on the management of fitness for operational firefighters.
- 1.2.** The standards contained within this guidance are a product of the report entitled 'Development of Occupational Fitness Standards for the UK Fire and Rescue Services' which was produced in 2014 and was the result of expert studies undertaken by the University of Bath (Dr. Bilzon et al).
- 1.3.** In 2009, 'Fitness for Fire and Rescue: Standards, Protocols and Policy' was published, establishing the Chester Treadmill Test as a national industry-standard method of testing, being a bespoke testing solution, which increases in intensity incrementally, and which is a reliable indicator of a subject's VO2 max.

- 1.4. The minimum standard required for operational firefighters to be able to carry out their role safely and effectively was established as equivalent to a **VO2 max of 42.3**ml.kg-1.min-1.
- 1.5. A minimum standard required for incident commanders (operational staff holding the rank of Station Commander and above) to be able to carry out their role safely and effectively was established as equivalent to a **VO2 max of 36.8**ml.kg-1.min-1.
- 1.6. These minimum standards assure both the wellbeing and operational effectiveness of staff. They were derived by measuring the metabolic load (millilitres of oxygen consumed in a minute per kilogram of bodyweight - VO2ml.kg-1.min-1) in test subjects while performing certain tasks. The mean metabolic loads were then established as objective, minimum standards based on these specific tasks.
- 1.7. The VO2 national threshold for firefighter fitness was established based on the physical demands of what were identified as a selection of the most arduous, critical tasks undertaken in the role of a firefighter. The tasks were a mixture of strength-based carrying tasks and those known to elicit a high aerobic demand. They were used to identify the minimum level of cardiorespiratory fitness required to ensure the safety of firefighters and their effectiveness in their role. The following tasks were selected: hose run, equipment carry, stair climb and casualty evacuation exercise. The tasks selected were, in part, chosen because they could be replicated in a test environment and results could be reliably measured. Other tasks are more difficult to replicate in a test setting, for example, a wild-land fire exercise was originally included as a fifth test activity but was discounted due to difficulties in replicating the task in a controlled environment. Repeatability and reliability issues limit the number of activities which may be successfully utilised in a test setting, and the tasks selected were therefore chosen in part on account of this consideration, as well as for being indicative of the type of strenuous tasks carried out by all firefighters, including in London.
- 1.8. In London, hose-rolling (one of the four selected tasks) is performed differently and requires less physical exertion. Tests were undertaken in London (2019) substituting the London hose-rolling method and these resulted in the adjusted mean VO2 threshold being lower than the national standard. However, it is recognised that the activities selected for the purpose of calculating the national VO2 were, for the reasons set out above, indicative of the type of arduous activity required for the role, and therefore they remain relevant to the London Fire Brigade, notwithstanding the difference in hose rolling.
- 1.9. Furthermore, there are other activities, for example high-rise firefighting (prevalent in London) which also require considerable physical exertion. These could equally have been used to test the standard of fitness required of fire fighters but as explained above, they are potentially more difficult to replicate and measure in a test setting.
- 1.10. The physical exertion and cardio-respiratory fitness required in high rise building fire scenarios is of particular relevance to London firefighters given the London built environment. Research has recently been undertaken on behalf of the London Fire Brigade on the Physiological Demands of High-Rise Operations (report dated 08 Mar 2021) by Dr Bilzon of Bath University (on whose research the national VO2 standard is based). Dr Bilzon's report noted that:

'The results of this study again highlight the importance of cardiorespiratory fitness for performing arduous firefighting tasks. The overall size and diversity of the sample recruited for this study allowed us to split the group into those that were above and below the national firefighter fitness threshold of 42.3 ml.kg-1.min-1. This created a higher fitness group with a mean (SD) VO2max of 47.5 (3.5) ml.kg-1.min-1 and a lower fitness group with a mean (SD) VO2max of 38.3 (2.8) ml.kg-1.min-1. The higher fitness group were able to complete this simulated high-rise ascent and descent 20% and 23% faster than the lower fitness group, in SDBA and EDBA, respectively. The higher fitness group also managed their air supply more efficiently in SDBA, with less of them going under

whistle on the ascent phase.

It is also worth noting that individuals with a high relative cardiorespiratory fitness tend to have a higher thermal tolerance. This is partly because their regular exercise training results in sustained daily hyperthermic episodes, where core body temperature regularly exceeds 39.0°C. Consequently, they are partially heat acclimatised, which has a number of advantages. Endurance trained (and acclimatised) individuals tend to have a greater thermal range, characterised by a lower resting core body temperature and a higher tolerable maximum core temperature. They also have an earlier onset of sweating to a hyperthermic challenge and greater cardiovascular stability, making them less prone to low blood pressure and fainting.'

1.11. The 2021 report on high-rise operations does not seek to revise the national VO₂ standard, but it is used as the baseline for commenting on the implications of firefighter fitness and high-rise fire fighter activities and clearly concluded that:

'... the role of physical fitness cannot be over-emphasised, ensuring more efficient use of limited air supply, ensuring optimal operational performance and effectiveness, while minimising the risk of heat-related illness or exhaustion.'

1.12. Accordingly, taking into account the particular nature of fire-fighting activities in London and Bilzon's observations about the importance of the level of physical fitness in relation to those specific activities, there is a reasonable justification for adopting the national VO₂ standard in London, irrespective of the differences of approach to hose carrying on the ground. It is in the interests neither of the firefighters, nor of the communities they serve, to adopt a lower VO₂ standard in London based solely on the fact that one of the specific tasks chosen to be evaluated as part of the national research is undertaken differently in London.

1.13. The 2009 report entitled 'Fitness for Fire and Rescue - Standards, Protocol and Policy' came to a conclusion regarding VO₂ standards required of firefighters remarkably similar to the current national guidance, stating that: *'The recommended National standard of aerobic fitness is 42 mlSO₂ /kg/min and applicable to all Firefighters irrespective of age, gender or duty system'*. The national guidance regarding the level of required fitness required has therefore remained consistent for several years, further justifying the adoption by London of the national standard.

1.14. The current national guidance document, entitled 'Firefighter Fitness Best Practice Guide (2016)' recognised that:

'In the longer term, new technologies and further such developments may impact on the fitness requirements of firefighters'. But the guidance goes on to comment that 'However for the present such innovations are unlikely to impact greatly on the fitness requirements for firefighters, or change any aspect of the fitness testing covered in previous sections of this guidance. FRAs will however wish to consider supporting the principle for the future of ensuring the reduction of physical burden is a priority'.

This is a clear recognition of the continued need for high levels of physical fitness amongst firefighters irrespective of local variances in technique.

1.15. The national standards are currently employed nationally by the majority of UK FRS.

1.16. While the guidance and background material recognise the possible disparity in the ability of some groups (for example women and older staff of both sexes) to undertake the tasks and achieve the target as easily as others, there is no other 'industry standard' available to measure the level of fitness considered necessary to undertake a firefighter's functions.

1.17. It is also recognised that, due to average physiological differences between groups defined by

reference to particular protected characteristics (especially sex and age), any test designed to measure physical capacity to undertake the tasks is likely to result in a similar position.

- 1.18.** It is therefore considered that the national V02 test is a necessary and proportionate means of ensuring fitness to undertake the roles and there is currently no other appropriate available test that can be adopted which would have a less disproportionate impact.
- 1.19.** Having regard to the nature of the roles and the standards required to undertake them, it is therefore considered reasonable to adopt the national standards though, for reasons set out in this report, the tests and outcomes will be kept under review, particularly in the first 12-month transitional period (phase one). This may include discussion with those who conducted the Bath University research to explore further their conclusions and the basis on which they were reached.
- 1.20.** As physical fitness can decline over a short space of time, periodic fitness testing at regular intervals is an important factor in supporting firefighters to maintain their required fitness levels. Adults who are physically active have a 20 to 30 percent reduced risk of premature death, and up to a 50 percent reduced risk of developing major chronic diseases such as coronary heart disease, stroke, diabetes, and cancers (NHS information source 30 November 2022).
- 1.21.** Fitness levels may decline with age, though this may be addressed by a commitment to regular exercise and maintaining a healthy lifestyle. Pregnancy, maternity, and menopause will impact ability to maintain cardiovascular fitness for a time. A wealth of tailored support and guidance is currently available to all staff via referral to the LFB Fitness Advice Team, based at Paddington fire station.
- 1.22.** LFB implemented a centralised model of periodic fitness testing in 2020 based at Paddington fire station. This was paused during the Covid 19 pandemic (detailed below), and fitness testing has not yet re-started. In summary fitness testing:
 - Started 20 January 2020, paused 16 March 2020 (620 staff tested during this period).
 - Restarted 14 June 2021, paused 13 December 2021 (606 staff tested during this period).
- 1.23.** The People Board since agreed to devolve LFB's periodic fitness testing programme to fire stations for ranks Firefighter to Station Officer, while retaining the Fitness Hub at Paddington for Re-testing (RT) of staff who do not meet the required standard and periodic fitness testing of staff with specific and known medical issues likely to affect their performance (minute 11, 17 May 2022 of People Board).

2 Objectives and expected outcomes

2.1 The objectives of this proposal are to:

- Ensure all operational staff meet national fitness standards.
- Support cultural change promoting commitment to regular exercise.
- Provide opportunities for exercise, and support staff in doing the same.
- Provide tailored fitness advice to all staff where required.
- Provide focused support for underrepresented groups (such as women and older members of staff who will, on average, find it more challenging to maintain the standard required for physiological reasons).
- Support a measurable reduction in staff sickness, work related injuries, stress, anxiety,

and depression.

2.2 A phased approach to implementation is required and summaries of the two phases are detailed below. Phase one is planned to commence on 01 June 2024, following the communications plan.

2.3. Phase one (first annual cycle) will:

2.3.1. Establish the station based, AFT of Firefighters to Station Officers. This will be undertaken at a local fire station (or other suitable venue) and be administered & recorded by:

- Watch Officers [minimum rank LFF(D)] for AFT of Firefighters and subordinate Watch Officers (the test administrator must be a minimum of one rank above the test participant),
- Station Commanders for AFT of senior Watch Officers (Sub Officers at one appliance and Station Officers at two appliance stations).

2.3.2. Institute a comprehensive and transparent system of tailored support and management for staff who do not meet the minimum standard pertaining to their rank (see appendix one for draft Fitness Support and Management process map).

2.3.3. Launch 'LFB Move' (appendix two) – a multi-faceted and long-term cultural change initiative designed to support and incentivise LFB staff to engage in a wide range of exercise and fitness activities.

2.4. Phase two (second annual cycle – estimated to commence in June 2025) will:

2.4.1. Establish the AFT of Station Commanders and above, at a local fire station or other suitable venue (commencement of testing for Station Commanders may be achievable during phase one, depending on availability of resources, and this timescale will be kept under review).

2.4.2. Offer voluntary Elective Fitness Testing (EFT) for all other (both temporarily and permanently non-operational) LFB staff, including FRS staff.

2.4.3. Establish the bespoke AFT of staff and teams for whom an enhanced minimum fitness level is required (e.g. SERT).

2.4.4. Internally train and certificate LFB Physical Training Instructors (PTIs) to support colleagues and the testing regime, with a long-term goal of achieving at least one on every fire station.

2.4.5. Amend PN 0935 Fitness Policy for Uniformed Operational Staff to include full details of Annual Fitness Testing and the support and management processes for underperforming staff (see appendix one).

2.4.6. Work with People Services and representative bodies to review arrangements for the re-deployment of staff at the conclusion of Fitness Support and Management processes.

2.5. Key changes recommended to the model employed during the 2020 roll-out (non-exhaustive)

2.5.1. Devolvement to fire stations

2.5.1.1. To reinstitute periodic fitness testing, employing a devolved model wherein testing for ranks of Firefighter Development to Station Officer is administered and recorded by line managers at fire stations (or other local venue, subject to a risk assessment).

2.5.2. Annual testing cycle

2.5.2.1. Evidence demonstrates that testing which takes place annually is more likely to be effective in supporting firefighters to maintain their required fitness levels than that which takes place less frequently, and annual testing is stipulated as best practice in the national guidance. As a result, LFB's periodic fitness testing will now be annual, rather than every 18 months, as was the case during the 2020 roll out.

2.5.3. Three primary test modalities (choice for staff)

2.5.3.1. Positive staff engagement has identified that operational staff favour being offered choice in terms of test modality and, due to differences in individual physiology, any single test modality is bound to prove disproportionately difficult for some.

2.5.3.2. Though the Chester Treadmill Test was designed specifically for use by UK FRS in periodic fitness testing, there are other suitably reliable test modalities which are currently used by other UK FRS and the Metropolitan Police, alongside the Chester Treadmill Test. All of these may be used to reliably test for the VO₂ max standards established in the national guidance.

2.5.3.3. For these reasons it is recommended that LFB will offer the following three primary Annual Fitness Testing modalities to provide staff with the desired flexibility:

- Chester Treadmill Test (CTT),
- Multi-Stage Fitness (Bleep) Test (MSFT),
- 1.5 Mile Run Test (1.5MR).

2.5.3.4. The MSFT and 1.5MR will be subject to a health and safety impact assessment and appropriate representative body consultation prior to go-live.

2.6. National guidance attributes a 'Red/Amber/Green' (RAG) system to periodic fitness test outcomes. For the ranks of FF(D) to Station Officer they are as follows:

2.6.1. Green - Fit - estimated VO₂ max of 42.3 or greater:

Outcome for candidates who complete either:

- The full 12 minutes of the CTT,
- Level 8.8 of the MSFT, or
- 1.5MR in 12 minutes 25 seconds or less.

2.6.2. Amber - Potentially Unfit - estimated VO₂ max of between 35.6 and 42.2:

Outcome for candidates who:

- Achieve between 9 minutes 50 seconds and 11 minutes 59 seconds of the CTT,
- Achieve between level 6.8 and 8.7 of the MSFT, or

- Take between 12 minutes, 26 seconds and 15 minutes, four seconds, to complete the 1.5MR.

2.6.3. Red - Unfit - estimated VO₂ max of 35.5 or less:

Outcome for candidates who:

- Achieve less than 9 minutes 50 seconds of the CTT,
- Achieve less than level 6.8 of the MSFT, or
- Take longer than 15 minutes and four seconds to complete the 1.5MR.

2.7. Metabolic Gas Analysis Testing and Fire Ground Drill test upon referral to the Fitness Advice Team

2.7.1. Staff who are unable to achieve a green outcome by way of any of the three primary test modalities outlined above will be referred to the Fitness Advice Team.

2.7.2. The Fitness Advice Team will first carry out a more detailed Physical Activity Risk Assessment (PAR) than was administered prior to testing at station, including measurement of the test candidate's blood pressure, to ensure it is safe for them to engage in rigorous exercise.

2.7.3. If the outcome of the PAR indicates it is safe to do so, the Fitness Advice Team will use Metabolic Gas Analysis Testing (MGAT) which analyses the breath gas of candidates during exercise to precisely measure VO₂ max in real time (in contrast to the primary test modalities which only predict it).

2.7.4. MGAT enables the Fitness Advice Team to tailor the re-testing of staff to individual needs by providing extensive flexibility of test modality. Candidates may choose to cycle, row, or use any available exercise equipment to load their cardiovascular system, ruling out the possibility that for some candidates, the three primary test modalities may be an issue, rather than a VO₂ max deficit. MGAT is an additional step to those set out in the national guidance, providing greater accuracy and inclusivity.

2.7.5. Two portable, wearable Metabolic Gas Analysis units including all required ancillaries for the first 12 months projected use will cost approximately £15,055. This will be funded from fire stations' budget under delegated authority.

2.7.6. Metabolic Gas Analysis Testing will only be administered upon referral to the Fitness Advice Team by suitably qualified staff, who are trained in the use of the equipment.

2.7.7. The national guidance recognises the Fire Ground Drill test as a secondary means of testing those with amber VO₂ max test outcomes. Whilst this is included in the LFB proposal, the position will need to be carefully monitored, as it is recognised that this is likely to have a disproportionate impact on women, and possibly older men, since it is more difficult for people with a relative lack of upper body and or grip strength. It also presents other issues, including potential physical harm for some, due to the nature of the test. While it will only be undertaken following a positive PAR and amber MGAT, the risks associated with the Fire Ground Drill Test need to be fully understood and considered.

2.8. Scheduling of Annual Fitness Testing

- 2.8.1.** Annual Fitness Testing will be scheduled by Central Operations in collaboration with EPT.
- 2.8.2.** Each of the 412 operational watches will be assigned a calendar month in which to complete the Annual Fitness Testing of all their staff. More time will be provided for larger watches such as Wembley.
- 2.8.3.** Watches will be given a minimum of 28 days' notice prior to the start of their inaugural Annual Fitness Testing month and will retain their assigned testing month year on year. For example: Red Watch at Chelsea will undertake the AFT of their entire watch in March every year. This approach provides a level of certainty for the watch.
- 2.8.4.** Annual Fitness Tests will appear in the LFB Diary of each watch 28 days prior to the start of the month they are due to be completed, in the form of a new Best Practice Assessment (BPA) for each member of staff.
- 2.8.5.** Staff who transfer to other watches will have to complete an Annual Fitness Test during their new watch's testing month, or a year after their last Annual Fitness Test, whichever occurs sooner, after which they will adopt the testing month of their new posting.

2.9. Managing the potential impact on staff and resources

The national guidance provides that staff with red test outcomes must be removed from operational duties while they are supported in working towards achieving a green outcome, whilst staff with amber outcomes must undertake the Fire Ground Drill Test, the outcome of which will decide whether or not they may be permitted to remain on full operational duties whilst working towards achieving a green outcome, or whether they must be removed from operational duties also (candidates must complete the Fire Ground Drill test in 11:14 seconds to pass, this corresponds to the VO2 of 42.3).

- 2.9.1.** It is considered in the interests of the wellbeing of staff and the effectiveness of LFB operations, for LFB to remove staff with red test outcomes from operational duties, and to take additional steps in respect of those who obtain amber outcomes. This is in line with the national guidance. The LFB Annual Fitness Testing process map is attached as appendix three.
- 2.9.2.** For LFB, aligning to national guidance will substantially increase the minimum standard required of all female staff over the age of 20, and all male staff over the age of 30. Engagement with other UK FRS' identifies that many were in a comparable position when first adopting the national guidance.
- 2.9.3.** Based on the 2020/2021 data in which 120 staff had red outcomes, it is reasonable to expect that some staff will need to be placed on light duties for a period of time in the early stages of testing. Sickness may see an associated increase, as it is reasonable to expect that the causal issue for some of the staff who are at first unable to meet the standard required will be an underlying health condition.
- 2.9.4.** However, it is also reasonable to expect that provision of appropriate support and or

medical treatment will mean that, for many, only a short period on light duties will be necessary, thus reducing the overall number.

2.9.5. Furthermore, the necessity Annual Fitness Testing places on a commitment to regular exercise may encourage staff to seek early interventions for emerging medical conditions, and as early interventions promote favourable outcomes, this coupled with the aforementioned benefits to health and wellbeing should, in the fullness of time, contribute to a reduction in staff sickness, as well as stress, anxiety and depression.

2.9.6. As explained elsewhere in this report, the tests, testing mechanisms, equality impact, and data relating to outcomes, will all remain under review, with a particular focus on the first annual cycle. Careful monitoring of the number of staff available for operational duties will be undertaken and appropriate steps taken where necessary.

2.10. LFB processes for staff who are unable to meet the required standard under the national guidance.

2.10.1. Staff with red outcomes will be placed on Light Duties (LD) immediately, pending a referral to the Fitness Advice Team who will:

- Carry out a Physical Activity Risk Assessment.
- Refer to Occupational Health when indicated.
- Employ Metabolic Gas Analysis Testing where appropriate.
- Administer the Fire Ground Drill Test where appropriate.
- Provide a tailored Fitness Action Plan.
- Provide an outcome to the candidate's line manager indicating whether the candidate must remain on LD or whether they may be restored to full operational duties whilst working towards a green outcome.

2.10.2. Staff with amber outcomes will remain on full duties initially, pending a referral to the Fitness Advice Team who will:

- Carry out a Physical Activity Risk Assessment.
- Refer to Occupational Health when indicated.
- Employ Metabolic Gas Analysis Testing where appropriate.
- Administer the Fire Ground Drill Test where appropriate.
- Provide a tailored Fitness Action Plan.
- Provide an outcome to the candidate's line manager indicating whether the candidate may remain on full duties or whether they must be placed on Light Duties whilst working towards a green outcome.

2.10.3. In ALL cases:

- When staff with red or amber outcomes progress to being able to demonstrate a better outcome, their line manager must arrange for a test to be witnessed by a Station Commander, who may then restore the member of staff to full duties (if they have progressed from red to amber), or sign them off as fully fit for duty (if they achieve a green outcome), depending on the outcome of the witnessed test.

2.11. First annual cycle as a pilot

- 2.11.1.** An audit of LFB's treadmill estate has been undertaken which indicates that the current estate cannot be solely relied upon for the purpose of the CTT. The aging treadmills are almost universally out of acceptable tolerance in respect of elevation, which is a key requirement of the CTT, and cannot be recalibrated.
- 2.11.2.** It is therefore recommended that we procure 52 new treadmills initially (one for every other station plus one for LFB headquarters), at a unit cost of approx. £4,400: total approx. cost: £228,800 (including VAT). This proposal and cost will be subject of a separate report, estimated to be presented at Service Delivery Board in July 2024.
- 2.11.3.** To avoid delaying the roll-out of Annual Fitness Testing through the procurement and governance process required for the new treadmills, the first annual cycle (phase one) will be rolled-out with the current treadmill estate.
- 2.11.4.** This first annual cycle will be a pilot during which all support systems will be live, but managerial action (see appendix one for draft Fitness Support and Management process map) will be limited.
- 2.11.5.** This pilot phase will be a transitional period, allowing LFB to gather data and assess any impact which the application of the national standards may have by reference to protected characteristics.
- 2.11.6.** By the start of the second annual cycle (phase two) new treadmills, accurate in both speed and elevation, will be available to all staff, enabling the exclusive use of specific and accredited (new) treadmills for fitness testing in order to ensure reliability.
- 2.11.7.** The support offered to all staff during phase one, and consideration of the data relating to the impact of the national standards by reference to protected characteristics, will enable an informed decision to be taken on whether it is appropriate to conclude the pilot phase of Annual Fitness Testing.
- 2.11.8.** Only when the pilot phase is concluded will the 'managerial action' elements of the Fitness Support and Management Process be extended to include all staff who are unable to achieve a green outcome (see appendix one).

2.12.Support and management of underperforming staff

- 2.12.1.** Annual Fitness Testing aligned to the national guidance represents an increase in the standard of fitness required of almost all our staff.
- 2.12.2.** The draft Fitness Support and Management Process (detailed in appendix one) provides a system of support and management for staff who are, at first, unable to achieve a green outcome.
- 2.12.3.** Support is tailored to individual needs by subject matter advisors. The management process is consistent and transparent, and ample time will be given for staff to address underperformance, ensuring both equity and accountability for all operational staff.

2.13. Assurance

- 2.13.1.** A concern inherent in devolved models is potential falsehood, or failure to follow the guidance. For this reason, it is recommended that during the first annual cycle a programme of assurance is instituted by LFB's Assurance Team in which a percentage of the 412 operational watches (and other teams) will be selected for re-testing by assurance staff.

2.14. Key recommendations for approval

The following recommendations form the key changes and areas for approval:

- The choice of test modalities to include the Chester Treadmill Test, 1.5 Mile Run and the Multi-stage Fitness (bleep) Test,
- The phased implementation of AFT with the first annual cycle as a pilot,
- Use of the draft Fitness Support and Management Process for underperforming staff (appendix one),
- Metabolic Gas Analysis testing to facilitate more inclusive testing upon referral.
- Delegation of authority to AC for fire stations to amend PN 0935 – fitness policy for uniformed operational staff, to include full details of the AFT and the Support and Management Process for underperforming staff.

2.15. Conclusion

- 2.15.1.** At the completion of the second annual cycle, Annual Fitness Testing will provide LFB with high levels of assurance that its operational staff meet the standards required to be safe and effective in their roles, in accordance with national guidance.
- 2.15.2.** The phased implementation takes into account the risk for individuals and the ongoing operational needs of the brigade and enables time for the cultural change around health and fitness while moving to a high level of assurance. It will also provide data for a review of any additional courses of action and time for the new accurate treadmills to be put in place, subject to approval of spend.
- 2.15.3.** The supporting cultural change initiative 'LFB Move' will support and incentivise staff to commit to regular exercise, the benefits of which will be far-reaching and could potentially include a measurable reduction in staff sickness, work related injuries, stress, anxiety, and depression.

3. Equality comments

- 3.1** The LFC and the Deputy Mayor for Fire and Resilience are required to have due regard to the various needs set out in 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 by reference to the protected characteristics set out in the Act, taking this into account in decision-making and evidencing how decisions were reached.
- 3.2** It is important to note that compliance with the Public Sector Equality Duty is not a one-off task. The duty must be fulfilled before taking a decision, at the time of taking a decision, and after the decision has been taken.
- 3.3** The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, marriage, and civil partnership (but only in respect of the requirements to have due

regard to the need to eliminate discrimination), race (ethnic or national origins, colour or nationality), religion or belief (including lack of belief), sex, and sexual orientation.

3.4 The Public Sector Equality Duty requires decision-takers in the exercise of all their functions, to have due regard to the need to:

- eliminate discrimination, harassment and victimisation and other prohibited conduct.
- advance equality of opportunity between people who share a relevant protected characteristic and persons who do not share it.
- foster good relations between people who share a relevant protected characteristic and persons who do not share it.

3.5 Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:

- remove or minimise disadvantages suffered by persons who share a relevant protected characteristic where those disadvantages are connected to that characteristic.
- take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it.
- encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

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

3.7 Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:

- tackle prejudice
- promote understanding.

3.8 An Equality Impact Assessment has been completed (appendix four). In summary:

- Annual Fitness Testing will be carried out in alignment with the national guidance which stipulates one singular, role related standard of VO₂ max for all ranks between FF(D) and Station Officer, and another for all ranks of SC and above, irrespective of age and sex.
- Though the VO₂ max standards required of staff in accordance with the national guidance are role related, VO₂ max can differ significantly between the sexes (typically higher in males than females, due to physiological differences), and will naturally decline with age.
- This will disadvantage older and female staff as the standards required do not account for these differences, though due consideration must be given to the fact that these differences may be offset by a commitment to regular exercise.
- The communications strategy associated with the roll-out of Annual Fitness Testing will promote the availability to older and female staff of fitness advice tailored to individual needs by the Fitness Advice Team.
- The cultural change initiative 'LFB Move' will support and incentivise staff to commit to regular exercise. LFB PTIs will be established to offer further support.
- These enablers will assist older and female staff in maintaining the required standards, including by committing to a suitable regime of regular exercise.

4 Other considerations

Workforce comments

- 4.1 A side meeting was held between project staff and FBU staff side representatives on 30 January 2024 in which informal comments were offered, which included:
- Supportive of the proposed flexibility of test modality.
 - Underperformance should not be under 'capability'.
 - Concerns regarding the safety of their members carrying out the Multi-Stage Fitness (bleep) Test in fire station yards owing to the risk of slips trips and falls.
 - Preference for staff with fitness wearables (watches or otherwise) being able to present their vo2 max as indicated by their device in lieu of testing.
- 4.2 An early briefing note was shared with the FBU on 22 March 2024 and comments have been received including on the testing types, process, and resourcing and these will be discussed with representatives through the usual channels (JCF, JCMM, BJCHSW).
- 4.3 Consultation with staff side representatives will continue through to adoption of policy.

Sustainability comments

- 4.4 This report details the devolved model of testing to fire stations which greatly reduces the necessity to travel to a centralised testing hub, which will result in a positive impact on staff travel requirements.
- 4.5 The procurement and disposal of 52 new treadmills will be outlined in a separate report, this will need to take into consideration responsible disposal routes of the 52 treadmills. The Sustainable Development Team will need to be contacted prior to disposal options are agreed.
- 4.6 Where new policies and/or corporate projects arise, they are subject to the Brigade's sustainable development impact assessment process.

Procurement comments

- 4.7 The procurement of the Treadmills and the Metabolic Gas Analysis Units will be conducted in accordance with the LFB's Schedule of Governance and the Public Contract Regulations (PCR). This paper explains that level of spend in relation to Metabolic Gas Analysis Units is within officer delegation, and accordingly if authority is granted to proceed with the plans to introduce annual fitness the Scheme of Delegation provides for the officers to enter into a compliant contract for the supply and delivery of those.

Communications comments

- 4.8 PN 0935 fitness policy for uniformed operational staff will require review to include full details of Annual Fitness Testing and the Support & Management Process for underperforming staff detailed within this report. This review is necessary to ensure guidance is current and available to be acted upon.

- 4.9** This will need to be communicated to all operational staff and stakeholders prior to conclusion of the pilot and the commencement of the second annual cycle of AFT.
- 4.10** A comprehensive communications strategy is being designed in collaboration with the Communications team.

5. Financial comments

- 5.1** This report recommends that Annual Fitness Testing is agreed for all operational staff. The report notes that this will be at a one-off revenue cost of £15,055, which will be contained within the existing Fire Station's budget, along with any ongoing costs for future years.
- 5.2** The report also notes that 52 additional treadmills are required at a total capital cost of £228,800. This will be the subject of a later report to Service Delivery Board in July and will also need to be considered as part of the Capital Programme for future years. This expenditure will also need to be approved in line with Governance requirements.

6. Legal comments

- 6.1** Under section 9 of the Policing and Crime Act 2017, the London Fire Commissioner (the "Commissioner") is established as a corporation sole with the Mayor appointing the occupant of that office. Under section 327D of the GLA Act 1999, as amended by the Policing and Crime Act 2017, the Mayor may issue to the Commissioner specific or general directions as to the manner in which the holder of that office is to exercise his or her functions.
- 6.2** By direction dated 1 April 2018, the Mayor set out those matters, for which the Commissioner would require the prior approval of either the Mayor or the Deputy Mayor for Fire and Resilience (the "Deputy Mayor").
- 6.3** Paragraph 3.1 of Part 3 of the said direction requires the Commissioner to consult with the Deputy Mayor as far as practicable in the circumstances before a decision is taken on (inter alia) any "[c] decision that can be reasonably considered to be novel, contentious or repercussive in nature, irrespective of the monetary value of the decision involved (which may be nil)".
- 6.4** The statutory basis for the actions proposed in this report is provided by section 7 (2)(a) of the Fire and Rescue Services Act 2004, under which the Commissioner must secure the provision of personnel, services and equipment necessary to efficiently meet all normal requirements for firefighting.
- 6.5** The Commissioner's general power to appoint staff can be found in s112 Local Government Act 1972 which states, at subsection 2, that: "An officer appointed under subsection (1) above shall hold office on such reasonable terms and conditions, including conditions as to remuneration, as the authority appointing him think fit."
- 6.6** It is noted that that during the earlier pilot, there were different standards for female employees and older staff, however, the report proposes increasing the fitness standard to align it with the national standard. There is therefore the risk that the above groups will be disproportionately impacted by the increased standard. The attached EIA notes this and provides means of addressing this. The report recognises that Phase 1 is a 12-month pilot, during which time data will be collected and reflected upon in any final policy changes. An EIA should be completed on the final policy position.

6.7 It is also noted that the current fitness Policy for Uniformed staff PN 935 will require a significant re write to set out the proposed testing regime and what process will be followed if staff fail the fitness standard. The representative bodies will have to be consulted on the changes to the policy.

List of appendices

Appendix	Title	Open or confidential*
1	Draft Fitness Support & Management Process Map	Open
2	LFB Move	Open
3	Annual Fitness Testing Process Map	Open
4	EIA	Open

Part two confidentiality

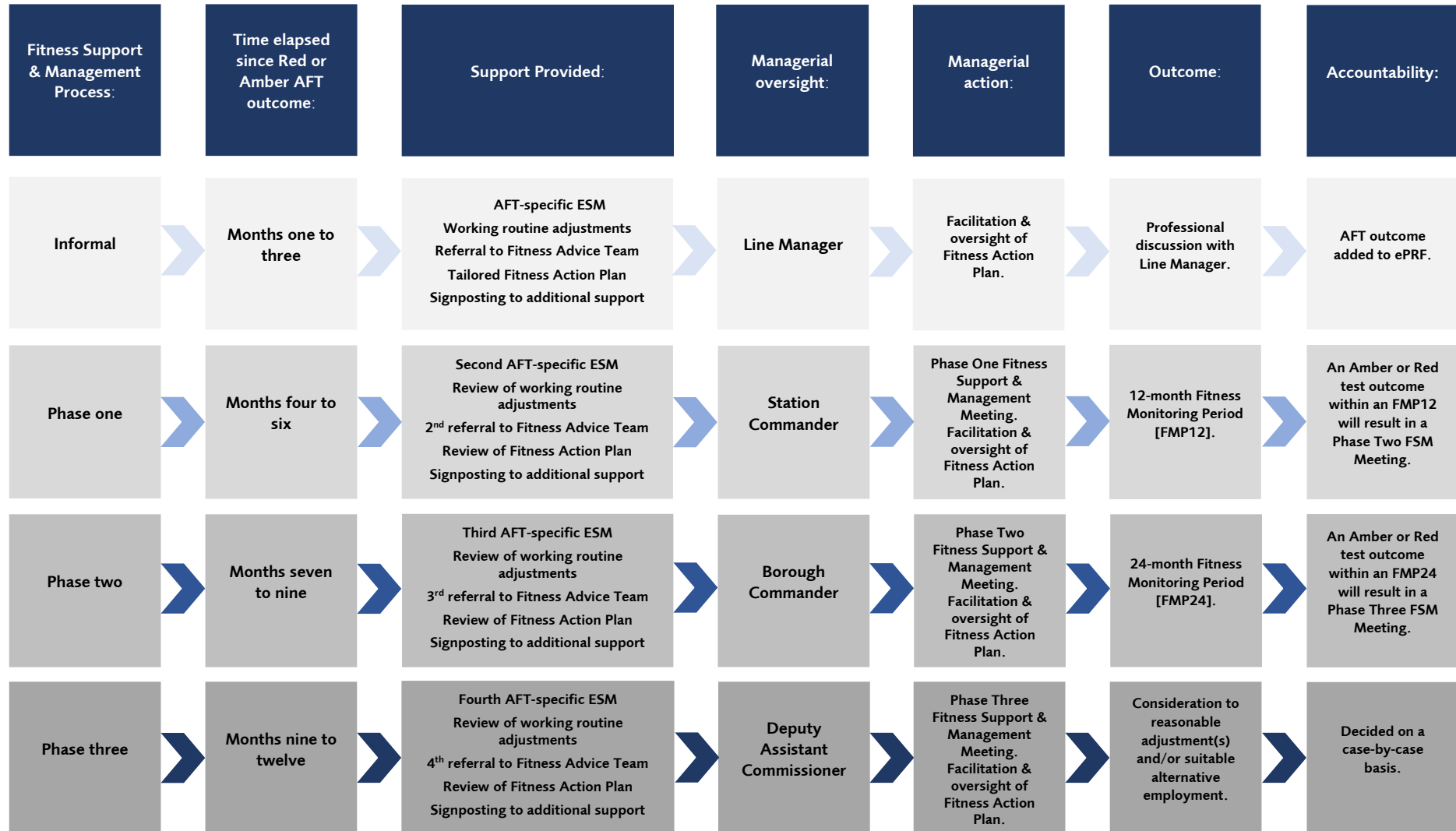
Only the facts or advice considered to be exempt from disclosure under the FOI Act should be in the separate Part Two form, together with the legal rationale for non-publication.

Is there a Part Two form: NO



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Fitness Support & Management Process Map





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LFB Move is a multi-faceted, long-term, cultural change initiative, designed to promote, facilitate, and incentivise LFB staff to engage in a wide range of exercise and fitness pursuits and to encourage all staff to take ownership and responsibility for maintaining the strength and fitness requirements pertaining to their operational roles.

Scope:

1. **Increase staff awareness and engagement** with the fitness advice, support, and activities available to them both within the organisation and externally.
2. **Profile and share the stories** of staff who role model high standards of fitness and wellbeing.
3. Launch monthly and quarterly **Fitness Challenges** that encourage staff to engage in different forms of exercise.
4. Recruit **Fitness Champions** [FCs] to organise both one off and regular, ongoing group fitness events, including team sports activities, which not only foster physical fitness but also build camaraderie among staff.
5. Make organising events easier by establishing the LFB Move **Fitness Event software application**: an easy to use, **advertising and registration app** on Hotwire, which will:
 - a. Advertise staff-organised Fitness Events on Hotwire.
 - b. Facilitate registration of interest [ROI] and registration of attendance [ROA] to enable organisers to make appropriate arrangements according to numbers of attendees.
 - c. The system will also promote integration of charity fund raising activities to diversify motivation for staff engagement.
6. Encourage inclusion of adventure trips and outings that incorporate physical activities, such as hiking, cycling, or water sports, blending leisure and exercise.
 - a. Risk ownership and liability will be given thorough consideration and will be controlled via the LFB Move Fitness Event software application which will incorporate appropriate terms, conditions, and waivers.
7. Encourage inclusion of events or programs where staff members can involve their families, including children, in fitness activities, bridging the gap between work and personal life.
8. Establish brigade-wide bi-annual **Drill Championships**:

Drills are physically demanding and when undertaken with the required frequency will contribute to the maintenance of cardiorespiratory fitness whilst consolidating core firefighting skills.

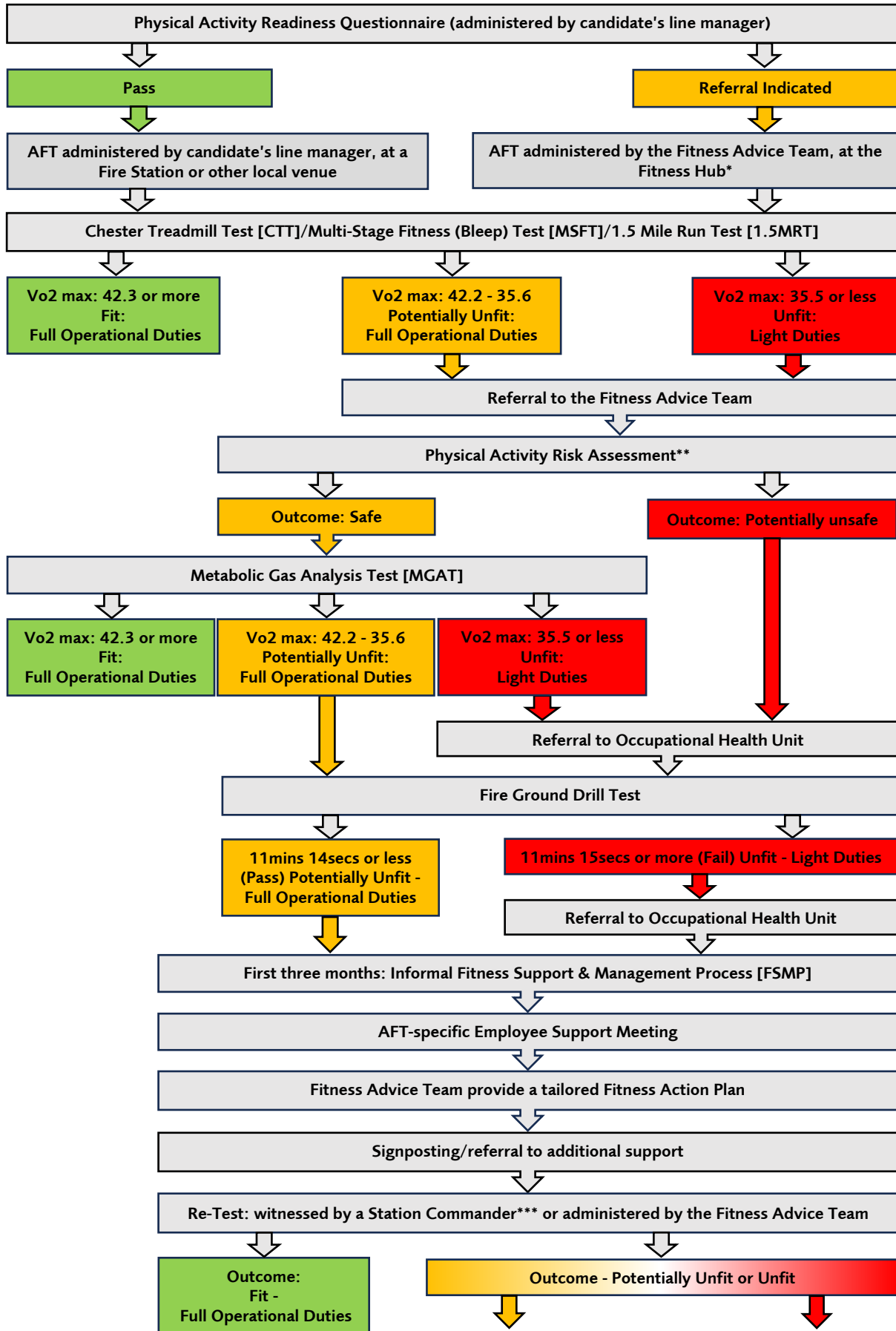
- a. A compulsory league for ladder pitches and uniform composite drills (utilising 'strategic resource' or 'training as a watch').
- b. Scored on technique, appropriate speed, and underpinning knowledge.

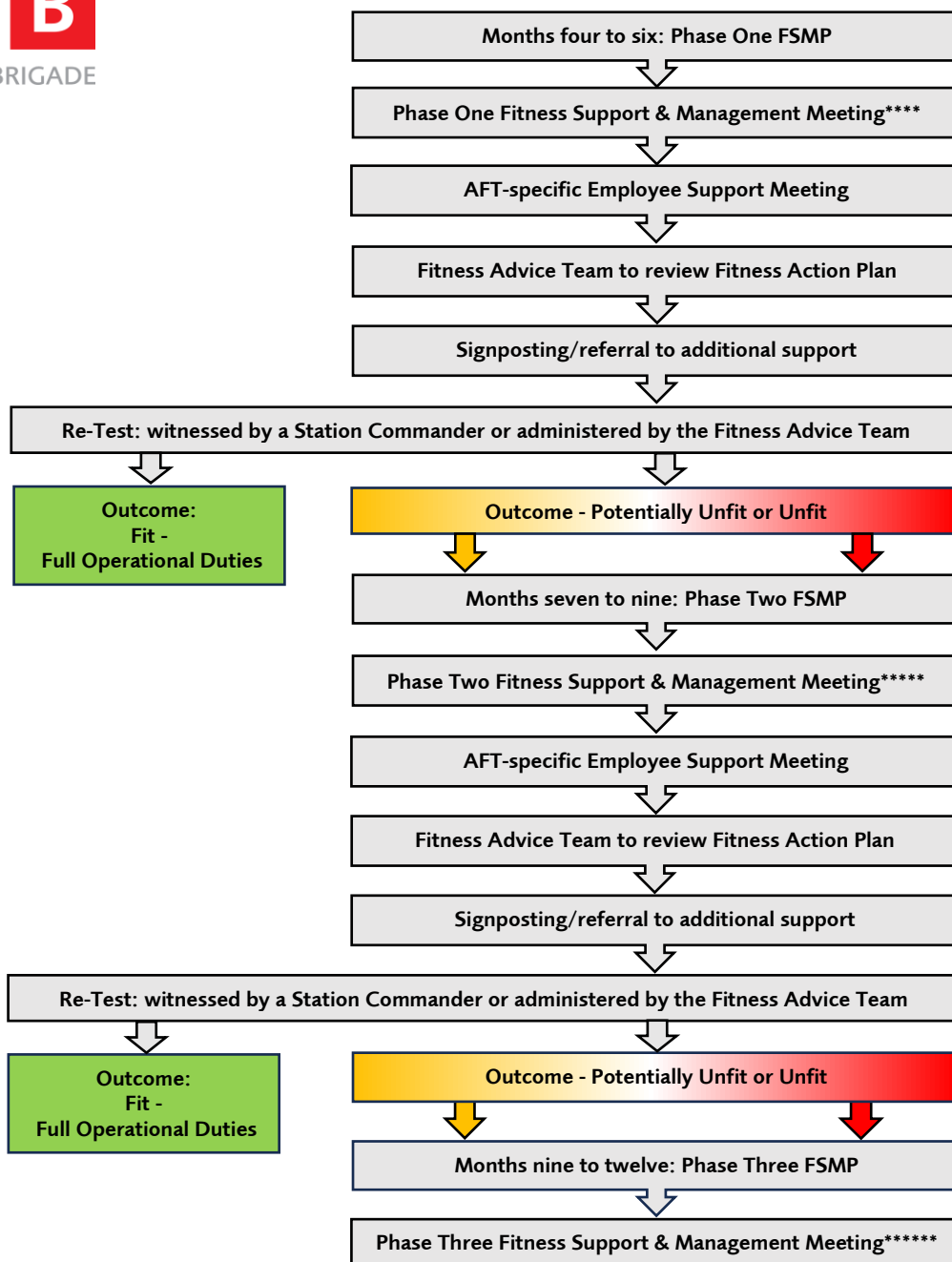


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- c. Signposting to existing resources and provision of workshops and borough training day inputs will refresh crews' knowledge of standardised technique and practice.
 - d. Preparatory workshops for all station-based Station Commanders and Day 6&7 Trainer SMEs to assist in judging.
 - e. Borough champions will go forward to brigade finals.
 9. Design and commission a new portable, demountable, **Breathing Apparatus [BA] Rat Run** (or re-condition and make portable the existing BA Rat-Run):
 - a. As large as is possible to fit on a prime mover.
 - b. Move it from borough to borough over a two-year cycle and establish a brigade-wide **Time-Trial league** which awards a bi-annual **BA Rat-Run Casualty Extraction Time Trial Championship**.
 10. Establish high-profile annual **Recognition & Awards** for staff who are high performing, who achieve notable personal achievements, or who provide support to other individuals, their team, or the LFB regarding exercise and fitness:
 - a. Fitness-specific LFB People Awards:
 - i. Outstanding fitness achievement award.
 - ii. Fitness Champion of the year award.
 - iii. Fitness Event organiser of the year award.
 11. Conduct **workshops** and commission **computer-based training** on fitness related topics such as nutrition, injury prevention, and sleep, to educate staff on maintaining a healthy lifestyle.

Annual Fitness Testing [AFT] Process Map





* Annual Fitness Testing carried out by the **Fitness Advice Team** at the **Fitness Hub** may provide greater flexibility of test modality by use of **MGAT**, though candidates may not be offered the Multi-Stage Fitness (bleep) Test, due to space constraints.

** A **Physical Activity Risk Assessment** will be carried out by the **Fitness Advice Team** to triage candidates and assess their suitability to attempt a **Metabolic Gas Analysis Test**. Referral to the **LFB Occupational Health Unit** will be initiated by the Fitness Advice Team where appropriate.

*** When staff with **red** or **amber** outcomes progress to being able to demonstrate an improved outcome, their line manager must arrange for a test to be witnessed by a **Station Commander**, who may then restore the member of staff to full duties (if they have progressed from red to amber), or sign them off as fully fit for duty (if they achieve a green outcome), depending on the outcome of the witnessed test.

**** **Phase One Fitness Support & Management Meetings** will be chaired by a **Station Commander** with a **HR representative** in attendance.

***** **Phase Two Fitness Support & Management Meetings** will be chaired by a **Group/Borough Commander** with a **HR representative** in attendance.

***** **Phase Three Fitness Support & Management Meetings** will be chaired by a **Deputy Assistant Commissioner** with a **HR representative** in attendance.



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Part 1: Equality Impact Assessment – submitter to complete

Before carrying out an Equality Impact Assessment (EIA), you should familiarise yourself with the guidance notes (see Appendix) 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 duty, as listed above, and provide any relevant information showing that your activity takes into account impact by protected characteristics (where applicable), eliminates potential discrimination, promotes equality and (where appropriate) fosters good relations

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

Name: Annual Fitness Testing (AFT).

Goal: Ensure all operational staff meet national fitness standards.

Outcomes:



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- At the completion of the second annual cycle, Annual Fitness Testing will provide LFB with assurance that its operational staff meet the minimum fitness requirements to be safe and effective in their roles according to national guidance.
- The supporting cultural change initiative 'LFB Move' will support and incentivise staff to commit to regular exercise, the benefits of which will be far-reaching and will include a potential measurable reduction in staff sickness, work related injuries, stress, anxiety, and depression.

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: Joseph Haynes

Job title: Station Officer

Department: Central Operations

Name: Matt Brown

Job title: Group Commander

Department: Central Operations

Responsibility for the whole activity:

Name: Spencer Sutcliff

Job title: Assistant Commissioner

Department: Fire Stations

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

Annual Fitness Testing is for all LFB staff (compulsory for all operational staff, available on an elective basis for all other LFB staff).

Annual Fitness Testing impacts all operational staff in that:

- As physical fitness can decline over a short space of time, periodic fitness testing at regular intervals is an important factor in supporting firefighters to maintain their required fitness levels.



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- These minimum standards were derived by measuring the metabolic load (millilitres of oxygen consumed in a minute per kilogram of bodyweight - $VO_{2ml.kg^{-1}.min^{-1}}$) in test subjects while performing fundamental tasks (hose run, equipment carry, stair climb, casualty evacuation) indicative of the type of arduous activity required for the role. The mean metabolic loads were then established as objective, minimum standards, required for operational firefighters and incident commanders to be able to carry out their roles safely and effectively.
- As such, the quality and reliability of the service we provide to the community is, in part, assured by Annual Fitness Testing.

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

- National EIA – conducted by CFOA (2015).
- Previous LFB EIA – conducted by Milo Bodrozic, LFB Wellbeing Team.

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 reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race including ethnicity and nationality
- Religion or belief
- Sex
- Sexual orientation

Also considering:

- Caring responsibilities
- Socio-economic backgrounds

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

Annual Fitness Testing meets the conditions of **due regard** to the **Public Sector Equality Duty** in the following ways:

1. Eliminate discrimination, harassment, and victimisation:

Annual Fitness Testing will be carried out in alignment with the national guidance which stipulates one singular, role related standard of fitness for all ranks between FF(D) and Station Officer, and another for all ranks of SC and above, irrespective of age and sex.

It is recognised that the role related standards, when applied to all staff, will likely have a disproportionate impact on certain protected characteristics, most notably age and sex, due to physiological differences.

- 1.12 The national guidance standards are robust in that they are directly related to the types of tasks to be performed within the roles and ensure that firefighters can perform their roles safely and effectively. It is therefore considered that the national V02 test is a necessary and proportionate means of ensuring fitness to undertake the roles and there is currently no other appropriate available test that can be adopted which would have a less disproportionate impact.

The first annual cycle will be a pilot and will operate as a transitional period, allowing LFB to gather data on the impact which the application of the national standards may have on protected characteristics. Consideration of this data will enable an informed decision to be taken on whether it is appropriate to continue testing in alignment with the current national guidance.

The proposals include a Fire Ground Drill test for some (a secondary test to determine whether, in the interim, individuals can remain on operational duties), which is also in line with the national guidance. This too is a physical test, which will likely have a disproportionate impact on certain protected characteristics, most notably age and sex, due to physiological differences. It is considered that this is justifiable in that it is related to the tasks to be performed and there are no other suitable means of testing currently available that would have a less disproportionate impact.

The disparate impact of annual Fitness Testing will be minimised by:

- **Tailored Fitness Programs:** The Fitness Advice Team offer customized fitness and training programs that address the specific needs of different groups within the workforce. For example, designing programs that help older firefighters or those undergoing physiological changes such as pregnancy, maternity, and menopause to maintain their fitness levels. They will also offer tailored action plans to staff who are at first unable to meet the required standard.
- **Alternative Testing Modalities:** As suggested, providing multiple testing modalities (e.g., Chester Treadmill Test, Multi-Stage Fitness Test, 1.5 Mile Run Test) will help accommodate individual preferences and capabilities, which is crucial for inclusivity.

Potential disproportionate impact will be kept under review by:

- **Periodic renewal of Health and Safety Impact Assessments:** At the conclusion of the first annual cycle's pilot phase, Central Operations will review the assessments with reference to the data gathered during the pilot, in order to understand and where possible mitigate the different impacts fitness tests may be having on the various demographic groups within the brigade.
- **Continuous Monitoring and Feedback:** Guidance to staff will include an invitation to provide feedback regarding each watch's experience of the testing process during the first annual cycle, allowing Central Operations to continuously monitor the impact of fitness standards and testing on all groups, whilst paying particular attention to protected characteristics and underrepresented groups. This feedback loop will enable LFB to consider adjusting programs and policies in real-time to better support equality of opportunity.

2. Advance equality of opportunity:

By ensuring that fitness standards which are applied to entrants are maintained over time, Annual Fitness Testing may enhance the justifiability of any disparate impact associated with such standards.

Protected characteristics likely to be disproportionately impacted:

Age:

Older employees may find it more challenging to meet the standard required due to the natural decline in physical capacity which comes with age. This could disproportionately affect their ability to pass the tests, potentially leading to indirect discrimination. Accommodations or adjustments are not possible in line with national guidance.

Mitigation: The first annual cycle will be a pilot. This will be a transitional period, allowing LFB to gather data on the impact which the application of the national standards may have on protected characteristics.

Consideration of this data will enable an informed decision to be taken on whether it is appropriate to continue testing in alignment with the current national guidance. LFB's Fitness Intervention Team and the Hotwire page associated with the cultural change initiative 'LFB Move' will provide tailored training programs that cater to the physiological capabilities of older employees.

Disability:

Individuals with disabilities may be at a disadvantage if their conditions limit their physical capabilities or if the tests are not adapted to their needs. Reasonable adjustments may be necessary to ensure the tests are as accessible as possible, without compromising the standards tested, and by extension, the safety and effectiveness of operational roles.



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Mitigation: The flexibility of Metabolic Gas Analysis Testing, which will be available on a case-by-case basis upon referral to the Fitness Advice Team, means it will be possible to offer alternative test modalities that are accessible to individuals with various types of disabilities.

Gender Reassignment

Staff undergoing gender reassignment may experience physical changes which will affect their ability to undertake strenuous exercise, particularly if undergoing hormone therapy which can impact muscle mass and fat distribution.. They may also face additional challenges accessing physical training for reasons connected with their gender reassignment. It will be necessary to ensure that such staff are not unjustifiably disadvantaged.

Mitigation: Staff who are unable to achieve a green outcome for whatever reason will be referred to the Fitness Advice Team who will provide them with guidance and flexibility in choosing the test modality most appropriate for their physical condition and stage of transition. LFB's commitment to ED&I and the related training it provides to all staff will foster the required inclusivity.

Marriage and Civil Partnership

This characteristic is unlikely to be directly impacted by fitness testing though individuals with family commitments may have less time to devote to physical fitness.

Mitigation: Flexibility is built into the month-long testing windows assigned to each watch. This will help individuals with significant family or caring responsibilities.

On a case-by-case basis, tests may be rescheduled around significant life events, ensuring those with marital, partnership or other commitments aren't unfairly disadvantaged.

Pregnancy and Maternity

Pregnant employees or those who have recently given birth may find it difficult to meet fitness requirements due to the temporary physical changes and recovery post-birth. Special considerations and adjustments, such as deferment or alternative evaluations, may be necessary to avoid discrimination.

Mitigation: In keeping with PN 0555 Family support leave (including maternity) policy (section 14 para. 1) Annual Fitness Testing will be deferred for pregnant employees and those on maternity leave. The Policy provides for a phased return to full operational duties and the test will therefore be deferred till their return to operational duties.



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Race, including Ethnicity and Nationality

Race, including Ethnicity and Nationality should not directly impact an individual's physical ability to meet fitness standards. However, ensuring that the testing environment is inclusive and free from harassment or discrimination is essential for equity.

Mitigation: LFB's embedded values and behaviours will foster an inclusive and respectful testing environment where all individuals feel safe and valued, regardless of race, ethnicity or nationality. Maintaining the associated training for officers and other staff who will administer the tests will ensure they are sensitive to issues of diversity and inclusion.

Religion or Belief

While not directly related to physical capability, religious practices (such as fasting) could indirectly affect an individual's ability to prepare for or perform in fitness tests. Flexibility in scheduling tests and sensitivity to religious practices and beliefs will help mitigate potential disadvantages.

Mitigation: The Annual Fitness Testing guidance document, the 'Testing Officer's Toolkit', will include guidance on engaging with employees to understand individual needs related to religious practices. Officers will be encouraged to ask staff to share details of any practice that may affect their fitness preparation or performance, and to schedule tests with consideration for religious observances, such as fasting periods.

Sex:

Physical fitness standards based on VO₂ max can differ significantly between sexes, being typically higher in males than females, due to physiological differences. This disparity will disadvantage many women as the standard required does not account for these differences.

Mitigation: The first annual cycle will be a pilot. This will be a transitional period, allowing LFB to gather data on the impact which the application of the national standards may have on protected characteristics.

Consideration of this data will enable an informed decision to be taken on whether it is appropriate to continue testing in alignment with the current national guidance.

The communications strategy associated with the roll-out of Annual Fitness Testing will promote and advertise the availability to female staff of fitness advice tailored to individual needs by the Fitness Advice Team as well as the specialist support and functional restoration programmes offered to female staff during maternity and targeted exercise prescription support for the menopause.

Sexual Orientation



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Sexual orientation should not directly impact an individual's physical ability to meet fitness standards. However, ensuring that the testing environment is inclusive and free from harassment or discrimination is essential for equity.

Mitigation: LFB's embedded values and behaviours will foster an inclusive and respectful testing environment where all individuals feel safe and valued, regardless of sexual orientation. Maintaining the associated training for officers and other staff who will administer the tests will ensure they are sensitive to issues of diversity and inclusion.

Caring Responsibilities

Individuals with significant caring responsibilities (for children, elderly relatives, or family members with disabilities) may find it more challenging to allocate time for regular exercise and preparation for the fitness tests. This could lead to a disproportionate impact on their ability to meet the fitness requirements.

Mitigation: The flexibility inherent in the month-long windows for scheduling individual tests, and provision of access to tailored training programs that can be completed at home.

Socio-Economic Background

Access to resources such as gyms, sports facilities, proper nutrition, or even safe spaces to exercise can be significantly influenced by an individual's socio-economic status. Those from lower socio-economic backgrounds may face barriers to maintaining the required fitness level due to limited access to these facilities.

Mitigation: LFB provides access to gym facilities and fitness advice resources for all staff and allocate time each shift to undertake fitness.

The associated cultural change initiative 'LFB Move' will include training programs that do not require expensive equipment or memberships and will offer guidance on maintaining fitness levels in a cost-effective manner.

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?

1. Head of LFB's Wellbeing Team.

Insights:

- History of fitness testing both nationally and within LFB.

How gained: Direct engagement.

How Evaluated: Discussions with the Head of LFB's Wellbeing Team, Central Operations team and other stakeholders listed, including the working group.

Follow-up: Continual through this development and implementation stage.

Post activity feedback: Yes.

2. Fire Fit conference.

Insights: Experiences of other UK FRS' regarding implementation of alignment with national guidance.

How gained: Direct engagement.

How Evaluated: Discussions with the Head of LFB's Wellbeing Team, Central Operations team and other stakeholders listed, including the working group.

Follow-up: No.

Post activity feedback: Yes.

3. Devon & Somerset FRS Fitness Team.

Insights:

- Value of Metabolic Gas Analysis Testing.
- Value in offering staff multiple test modalities.
- Disproportionate impact of national guidance standards on female and older staff.
- Six years data and experience in management of underperforming staff.

How gained: Direct engagement.

How Evaluated: Discussions with the Head of LFB's Wellbeing Team, Central Operations team and other stakeholders listed, including the working group.

Follow-up: Ongoing professional relationship.

Post activity feedback: Yes.

4. Metropolitan Police's lead rehab therapist and training instructor.

Insights:

- Value of Metabolic Gas Analysis Testing.
- Value in offering staff multiple test modalities.

- Disproportionate impact of national guidance standards on female and older staff.

How gained: Direct engagement.

How Evaluated: Discussions with the Head of LFB's Wellbeing Team, Central Operations team and other stakeholders listed, including the working group.

Follow-up: Ongoing.

Post activity feedback: Yes.

5. LFB's LGBTQ ESG lead.

Insights:

- Value of data collection regarding LGBTQ staff in relation to Annual Fitness Testing to allow identification of trends.
- Transgender and non-binary individuals may face challenges related to their transitioning process or how their physical fitness is assessed in relation to their gender identity.

How gained: Direct engagement.

How Evaluated: Discussions with the Head of LFB's Wellbeing Team, Central Operations team and other stakeholders listed, including the working group.

Follow-up: Ongoing.

Post activity feedback: Yes.

6. Annual Fitness Testing LFB working group.

Insights:

- Staff favour being offered choice in terms of test modality.
- Staff have concerns regarding disproportionate impact of Annual fitness Testing on female and older staff.

How gained: Direct engagement.

How Evaluated: Discussions with the Head of LFB's Wellbeing Team, Central Operations team and other stakeholders listed.

Follow-up: Future working groups will be convened periodically, and several attendees maintain correspondence.

Post activity feedback: Yes.

7. East London Mosque (Islam awareness course).

Insights: Religious practices (such as fasting) could indirectly affect an individual's ability to prepare for or perform in fitness tests. Flexibility in scheduling tests and sensitivity to religious practices and beliefs will help mitigate potential disadvantages.

How gained: Direct engagement.

How Evaluated: Discussions with the Head of LFB's Wellbeing Team, Central Operations team and other stakeholders listed, including the working group.

Follow-up: No.

Post activity feedback: No.

8. Injury prevention

Insights: At this stage it has not been possible to identify any specific studies or detailed information focusing exclusively on injuries incurred during the Chester Treadmill Test, the Multi-stage Fitness (bleep) Test, or the 1.5 Mile Run Test. However, insights can be drawn from general knowledge of injury trends related to similar activities. Below is a summary based on that understanding:

Chester Treadmill Test

- **Injury Risks:** The primary injury risks include falls, cardiovascular stress, and overexertion. Overuse injuries, such as calf strains, shin splints or stress fractures, may also occur with insufficient preparation or recovery.
- **Equality issues:** Older participants may have a higher risk of cardiovascular incidents due to increased stress on the heart. Males and females can have different risk profiles arising from different musculoskeletal stress points.

Multi-stage Fitness (bleep) Test

- **Injury Risks:** This test involves short bursts of running with rapid direction changes, which can lead to ankle sprains, knee injuries, muscular strains, slips, trips, and falls. The repetitive nature of the change in direction increases the risk of overuse injuries. However, the risk of these types of injuries will be reduced for many test candidates because the required level 8.8 will be achieved substantially below their maximal effort.
- **Equality issues:** Older and less fit test candidates will be at greater risk of these types of injuries. It is expected that the impact of sex on injury rates to be negligible, with general fitness and conditioning being the deciding factor, though differences in muscle mass and joint stability could influence the types of injuries sustained.

1.5 Mile Run Test

- **Injury Risks:** Common injuries include musculoskeletal issues such as runner's knee, shin splints, and stress fractures, as well as acute incidents like sprains from tripping. Overexertion and heat-related illnesses are also concerns. However, the risk of these types of injuries will be reduced for many test candidates because the required pace will be substantially below their maximal effort.
- **Equality issues:** Older runners may be at higher risk of overuse injuries in the absence of conditioning. Differences in injury patterns may arise between the sexes owing to biomechanical differences, with women more prone to certain types of joint and soft tissue injuries.

Mitigation:

- **Preparation and Recovery:** Adequate training and recovery are crucial for minimizing the injury risk arising from each test modality. Adequate communications must be disseminated, informing staff that Annual Fitness testing is coming, and providing them with guidance on how to prepare, including proper warm-up and cool-down routines, progressive vo2 acquisition training, as well as strength and flexibility exercises.
- **Availability of individual assessment:** Tailored fitness advice and preparatory programmes to individual capabilities, considering factors like age, sex, fitness level, and pre-existing conditions will help mitigate injury risks.
- **Supervision and safety protocols:** Testing will be administered by watch officers with a third person present to provide immediate emergency care capability and in readiness to address any signs of distress or injury.
- **Choice of test modality:** Injury risks are present and vary based on the type of test, as well individual characteristics such as the age and sex of the candidates. Providing choice of test modality allows for tailoring approaches to fitness testing and preparation, with an emphasis on safety and individual capabilities, which will be instrumental in reducing these risks.

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 document identifies potential issues and the data derived from the first annual cycle pilot phase will help inform the final policy position.

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?

Covered fully in section F.

G4. 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 communication strategy will be inclusive, accessible, and tailored to reach everyone in the organization, considering the diverse needs of the workforce. It will include the following strategies:



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1. All staff briefings:

- The Project team will host information sessions both online and in-person to explain the Annual Fitness Testing process, allowing for Q&A to address any queries and concerns. These sessions will be accessible, with accompanying physical materials available in easy-to-read formats.

2. Diverse Communication Channels

- The go-live will utilize a variety of communication channels to disseminate information, including coms messaging, BC & SC forums, Hotwire posts, Shout articles, Station Commander's briefings (to watches), Viva Engage dialogue and materials for physical bulletin boards. This will ensure that the message reaches all employees, including those who may not partake in regular access to digital platforms.

3. Training and Workshops

- The project team in collaboration with the Fitness Intervention Team will offer workshops that provide guidance on preparing for the fitness tests, including sessions specifically tailored to address the concerns of different groups, such as older employees and women. These workshops will also cover how to access support and accommodations.

4. Hotwire page

- A dedicated Annual Fitness Testing Hotwire page will be set up where employees can find information about the fitness tests, ask questions anonymously, and access resources like training programs.

5. Feedback Mechanism

- A confidential feedback mechanism will be established for employees to express concerns, provide suggestions, or seek clarifications about the fitness testing policy and its implementation.

6. Fitness Champions

- A peer support network/ambassador program will be established where staff can provide peer support, share their experiences, and assist their colleagues in navigating the process. It is anticipated that Fitness Champions will play a

significant role in promoting understanding and acceptance within the workforce.

7. Accessible Visual Aids

- A range of aids will be employed including infographics, posters, and videos to visually convey information about the testing process and the different test modalities, ensuring these materials are accessible (e.g. using alt text for images and captions for videos). Visual aids can help simplify complex information, making it more accessible.

8. Ongoing Communication

- Project staff will maintain open lines of communication about the fitness testing process, providing regular updates, and revisiting the communication strategy to adapt to changing needs and/or feedback from staff.

Conclusion re: communications:

Implementing a multi-faceted communication strategy that respects and addresses the diverse needs of the workforce will be key in ensuring the successful implementation of the mitigations related to the annual fitness testing policy.

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
<p>Age - Older employees may find it more challenging to meet the standard required due to the natural decline in physical capacity which comes with age. This could disproportionately affect their ability to pass the tests,</p>	<p>LFB's Fitness Intervention Team and the Hotwire page associated with the cultural change initiative 'LFB Move' will provide tailored training programs that cater to the physiological capabilities of older employees.</p> <p>The first annual cycle will be a pilot. This will be a transitional period, allowing LFB to gather data on the impact which the</p>	<p>Central Operations</p>

<p>potentially leading to indirect discrimination. Accommodations or adjustments are not possible in line with national guidance; the Standard is robustly linked to the tasks to be undertaken in relation to the role and there no alternative means of testing that would have a less disproportionate impact.</p>	<p>application of the national standards may have on protected characteristics.</p> <p>Consideration of this data will enable an informed decision to be taken on whether it is appropriate to continue testing in alignment with the current national guidance.</p>	
<p>Disability - Individuals with disabilities may be at a disadvantage if their conditions limit their physical capabilities or if the tests are not adapted to their needs. Reasonable adjustments may be necessary to ensure the tests are as accessible as possible, without compromising the safety and effectiveness of operational roles.</p>	<p>The flexibility of Metabolic Gas Analysis Testing, which will be available on a case-by-case basis upon referral to the Fitness Intervention Team, means it will be possible to offer alternative test modalities that are accessible to individuals with various types of disabilities.</p>	<p>Central Operations</p>
<p>Gender Reassignment - Staff undergoing gender reassignment may experience physical changes which affect their ability to undertake strenuous exercise, particularly if undergoing hormone therapy, which can impact muscle mass and fat distribution. They may also face additional challenges accessing physical training for reasons</p>	<p>Staff who are unable to achieve a green outcome for whatever reason will be referred to the Fitness Advice Team who will provide them with guidance and flexibility in choosing the test modality most appropriate for their physical condition and stage of transition. LFB's commitment to ED&I and the related training it provides to all staff will foster the required inclusivity.</p>	<p>Central Operations</p>

<p>connected with their gender reassignment. It will be necessary to ensure that such staff are not unjustifiably disadvantaged.</p>		
<p>Marriage & Civil Partnership - This characteristic is less likely to be directly impacted by fitness testing. However, considerations around time commitments for training and testing could indirectly affect individuals balancing family commitments, potentially impacting those who are married or in civil partnerships differently.</p>	<p>Flexibility is built into the month-long testing windows assigned to each watch. This will help individuals with significant family or caring responsibilities.</p> <p>On a case-by-case basis, tests may be rescheduled around significant life events, ensuring those with marital or partnership commitments aren't unfairly disadvantaged.</p>	<p>Central Operations</p>
<p>Pregnancy & Maternity - Pregnant employees or those who have recently given birth may find it difficult to meet fitness requirements due to the temporary physical changes and recovery post-birth. Special considerations and adjustments, such as deferment or alternative evaluations, may be necessary to avoid discrimination.</p>	<p>In keeping with PN 0555 Family support leave (including maternity) policy (section 14 para. 1) Annual Fitness Testing will be deferred for pregnant employees and those on maternity leave. They will be provided with an opportunity to test upon their return to operational duties.</p>	<p>Central Operations</p>

<p>Race, including Ethnicity and Nationality</p> <p>Race, including Ethnicity and Nationality should not directly impact an individual's physical ability to meet fitness standards. However, ensuring that the testing environment is inclusive and free from harassment or discrimination is essential for equity.</p>	<p>Mitigation: LFB's embedded values and behaviours will foster an inclusive and respectful testing environment where all individuals feel safe and valued, regardless of race, ethnicity or nationality. Maintaining the associated training for officers and other staff who will administer the tests will ensure they are sensitive to issues of diversity and inclusion.</p>	<p>Central Operations</p>
<p>Religion or Belief</p> <p>While not directly related to physical capability, religious practices (such as fasting) could indirectly affect an individual's ability to prepare for or perform in fitness tests. Flexibility in scheduling tests and sensitivity to religious practices and beliefs will help mitigate potential disadvantages.</p>	<p>The Annual Fitness Testing guidance document, the 'Testing Officer's Toolkit' will include guidance on engaging with employees to understand individual needs related to religious practices. Officers will be encouraged to ask staff to share details of any practice that may affect their fitness preparation or performance, and to schedule tests with consideration for religious observances, such as fasting periods.</p>	<p>Central Operations</p>
<p>Sex - Physical fitness standards based on VO2 max can differ significantly between genders, typically higher in males than females, due to physiological differences. This</p>	<p>The communications strategy associated with the roll-out of Annual Fitness Testing will promote and advertise the availability to female staff of fitness advice tailored to individual needs by the Fitness Intervention Team as well as the specialist support and functional restoration programmes offered to female staff during maternity and</p>	<p>Central Operations</p>

<p>disparity will disadvantage many women as the standard of fitness required does not account for these differences. . This could disproportionately affect their ability to pass the tests, potentially leading to indirect discrimination. Accommodations or adjustments are not possible in line with national guidance; the Standard is robustly linked to the tasks to be undertaken in relation to the role and there no alternative means of testing that would have a less disproportionate impact.</p>	<p>targeted exercise prescription support for the menopause.</p> <p>The first annual cycle will be a pilot. This will be a transitional period, allowing LFB to gather data on the impact which the application of the national standards may have on protected characteristics.</p> <p>Consideration of this data will enable an informed decision to be taken on whether it is appropriate to continue testing in alignment with the current national guidance.</p>	
<p>Sexual Orientation</p> <p>Sexual orientation should not directly impact an individual's physical ability to meet fitness standards. However, ensuring that the testing environment is inclusive and free from harassment or discrimination is essential for equity.</p>	<p>LFB's embedded values and behaviours will foster an inclusive and respectful testing environment where all individuals feel safe and valued, regardless of sexual orientation. Maintaining the associated training for officers and other staff who will administer the tests will ensure they are sensitive to issues of diversity and inclusion.</p>	<p>Central Operations</p>
<p>Caring Responsibilities</p> <p>Individuals with significant caring</p>	<p>The flexibility inherent in the month-long windows for scheduling individual tests, and provision of access to tailored training programs that can be completed at home.</p>	<p>Central Operations</p>



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<p>responsibilities (for children, elderly relatives, or family members with disabilities) may find it more challenging to allocate time for regular exercise and preparation for the fitness tests. This could lead to a disproportionate impact on their ability to meet the fitness requirements.</p>		
<p>Socio-Economic Backgrounds</p> <p>Access to resources such as gyms, sports facilities, proper nutrition, or even safe spaces to exercise can be significantly influenced by an individual's socio-economic status. Those from lower socio-economic backgrounds may face barriers to maintaining the required fitness level due to limited access to these facilities.</p>	<p>LFB provides access to gym facilities (and time provided during shifts) and fitness advice resources for all staff.</p> <p>The associated cultural change initiative 'LFB Move' will include training programs that do not require expensive equipment or memberships and will offer guidance on maintaining fitness levels in a cost-effective manner.</p>	<p>Central Operations</p>

I. Signed by the Submitter

Name: Joseph Haynes

Rank/Grade: Station Officer



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Date: 09/MAY/2024



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Part 2: Inclusion team to complete - feedback and recommendations

J. EIA Outcomes

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

Recommendation 1: No change required – the assessment showed that the activity is/will be robust.

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.

Recommendation 3: You must complete the mitigation action plan and continue the activity despite the potential for adverse impact with mitigation in place.

Recommendation 4: Stop the activity as there are adverse effects which cannot be prevented/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.

[text to be completed by the EIA Team]

L. Sign off by EIA Inclusion team

Date: