

Water Rescue Training and Compliance

Report to:

Investment & Finance Board
Commissioner's Board
Deputy Mayor's Fire Board
London Fire Commissioner

Date:

26 March 2026
14 April 2026
12 May 2026

Report by: Deputy Assistant Commissioner National Resilience, Operational Resilience and Control

Authorising Head of Service: Assistant Commissioner Operational Resilience and Control

Report classification:

For decision

For publication/Not for publication: For publication

Values met

Service
Teamwork
Learning
Equity
Courage
Learning

I agree the recommended decision below.



Jonathan Smith
London Fire Commissioner

**This decision was remotely
signed on 23 June 2026**
Date

PART ONE

Non-confidential facts and advice to the decision-maker

Executive Summary

This report sets out London Fire Brigade's (LFB) current water rescue training capability and the requirement to align with the National Fire Chiefs Council (NFCC) Rescue Boat Code 2021. The code was produced following the Marine Accident Investigation Branch (MAIB) Report 17/2020 into the collision between two fire & rescue service boats on the River Cleddau, Milford Haven in Wales on 17 September 2019 of which resulted in a firefighter fatality. The NFCC code prescribes minimum national training standards for water rescue, specifically Module 3 (Water and Flood Rescue Technician) and Module 4 (Water and Flood Rescue Boat Operator).

Water rescue forms a critical component of modern firefighting, reflecting the evolving risk profile of London. Climate change is materially increasing the frequency and severity of extreme weather events, particularly surface water and fluvial flooding, combined with tidal risk along the Thames and its tributaries. These emerging risks have been formally recognised across London, including through the Mayor of London's declaration of a climate emergency. Consequently, and in accordance with Community Risk Management Plan priorities (CRMP), the Brigade is increasingly required to prepare for and respond to flooding incidents across a wider geographical area, at greater scale, and in more challenging and hazardous operating environments. Ensuring robust, nationally recognised water rescue competence is therefore fundamental to sustaining an effective and resilient water rescue capability, meeting the challenges of increased urban flood risk, and the increasing impacts of climate change.

The report recommends that LFB adopt these standards and implement a sustainable training program to ensure full compliance.

For the London Fire Commissioner

That the London Fire Commissioner approves the adoption of the NFCC Rescue Boat Code 2021 as the prescribed minimum training standard for water rescue operations and agrees to commit revenue expenditure of up to £569,745 for the purposes of water rescue training.

1 Introduction and background

1.1 The NFCC Rescue Boat Code 2021 establishes minimum national standards for Fire and Rescue Services in the safe operation of powered rescue boats. The code includes training standards for Module 3 (Water and Flood Rescue Technician) and Module 4 (Water and Flood Rescue Boat Operator), specifying mandatory competencies, training hours, and recertification requirements. These are detailed in appendix one and two of this report. The Marine Accident Investigation Branch (MAIB) has highlighted the importance of national consistency and compliance in fatal accident reports.

- 1.2** Currently, LFB operates water rescue assets but does not align with the NFCC standards. This report considers the operational, financial, and organisational implications of achieving compliance. The analysis draws on predicted costs for Module 3 recertification, Module 4 Continuous Personal Development (CPD), and Module 4 recertification across LFB water rescue stations.
- 1.3** At present, LFB has an acquisition/initial course in place for Module 3 along with an annual CPD session; however, there is no formal three-yearly recertification course. For Module 4, LFB has an acquisition/initial course in place but does not currently provide either an annual CPD program or a three-yearly recertification course. The courses currently in place are sufficient and are being delivered in line with the learning objectives set out in the rescue boat code, but the lack of recertification and CPD arrangements has meant LFB operatives have fallen out of competence.
- 1.4** This paper recognises that the issue of competence and compliance relating to water rescue and boat operations as part of the modern firefighting syllabus was first identified in 2021. As a result of responsibility for water rescue capability moving to Operational Resilience and Control (OR&C) in 2025, the lead for water rescue was tasked with reviewing the situation and identifying options to resolve this challenge. This review has resulted in the submission of this report to:
- Investment and Finance Board
 - Commissioner's Board
 - Deputy Mayor's Fire Board
- 1.5** LFB's water rescue capability is hosted at Fire Rescue Unit (FRU) stations, currently referred to as Technical Rescue Centre's (TRC) and Hazmat Centre's, of which there are ten in total. Each of these ten stations currently carries a 4.7-meter inflatable boat with a thirty-horsepower outboard engine. As part of the Specialist Capability Review being undertaken by OR&C, there are potential proposals to reduce the number of stations with powered outboard engines. This would impact the number of personnel requiring Module 4 training to maintain compliance with NFCC standards. Current proposals suggest removing four locations with outboard engine capability, converting those stations to Module 3 teams only.
- 1.6** The current training requirement at all these stations is to train all staff in all relevant water rescue skills, ensuring that every firefighter based at a water rescue station can operate both at Module 3 and Module 4 levels. This requirement is being assessed as part of the ongoing review of specialist capabilities, which will determine whether a more targeted training model is appropriate considering proposed reductions in the number of outboard-equipped stations.
- 1.7** In addition, as part of the modernisation of LFB's larger fireboat and specialist capabilities, it is planned that all staff at Lambeth River will be trained in both Module 3 and Module 4. A risk assessment will be undertaken as part of the Officer Review, for Senior officers undertaking the Tactical Advisor role for technical rescue (TAR). This will determine whether this training is required for officers undertaking that function. This function has however been costed below.
- 1.8** The table below shows the current water rescue stations, Babcock training unit (TU) for each training course. One TU is currently **£95.10** this is subject to year increase as per the RPIx (Retail Price Index) The training requirement of personnel on those watches alongside a proposal (subject to the OR&C capabilities review) for the individuals who deliver the LFBs water rescue capability.

Station	Module 3 Recert		Module 4 CPD		Module 4 Recert	
	TUs 183		TUs 102		TUs 136	
	Current Amount	Proposal	Current Amount	Proposal	Current Amount	Proposal
Battersea	14	7	14	5	14	5
Edmonton	20	7	20	5	20	5
East Ham	14	7	14	5	14	5
Croydon	20	7	20	5	20	5
Heston	20	10	20	5	20	5
Wembley	22	10	22	0	22	0
Euston	14	10	14	0	14	0
Bethnal Green	14	10	14	5	14	5
Lewisham	14	10	14	0	14	0
Bexley	14	10	14	0	14	0
Fireboat	7	7	7	7	7	7
TAR	4	4	4	4	4	4
Subtotal - per watch	177	99	177	41	177	41
Total - Per Station/ Rota	708	396	708	164	708	164
Yearly Cost	£348,066	£191,436	£1,144,623	£261,905	£504,410	£116,402

Summary of Costings		
	Current	Proposed
Module 3	£348,066.00	£191,436.30
Module 4 CPD	£1,144,623.60	£261,905.40
Module 4 Recert	£504,410.40	£116,402.40
Total per year	£1,997,100.00	£569,744.10

OR&C have identified cost-effective means of meeting the standard, amounting to £1,427,355.90, through the proposed changes in trained personnel and capability within LFB's water rescue provision, which is subject to the Specialist Capability Review.

1.9 The below points cover the course costings

- The Module 3 recertification course cost is £17,403.30 and can have a maximum of 12 candidates on the course and is delivered over three days. This course is to be attended every three years, so the total requirement for trained personnel can be divided over a three-year period.

708 personnel divided by 3 = 236 each year divided by 12 per course gives a yearly course requirement of 20 courses which costs £348,066 per year. Or 396 personnel divided by 3 = 132 each year divided by 12 per course gives a yearly course requirement of 11 courses which costs £191,436.30 per year

- The Module 4 CPD course cost is £9,700.20 and can have a maximum of 6 candidates on the course and is delivered over two days. This course is to be attended every year. 708 personnel divided by 6 per course gives a yearly course requirement of 118 courses which costs £1,144,623.60 per year. Or 164 personnel divided by 6 per course gives a yearly course requirement of 27 courses which costs £261,905.40 per year.
- The Module 4 recertification course cost is £12,933.60 and can have a maximum of 6 candidates on the course. This course is to be attended every three years, so the total requirement for trained personnel can be divided over a three-year period. 708 personnel divided by 3 equals 236 each year divided by 6 per course gives a yearly course requirement of 39 courses which costs £504,410.40 per year. Or 164 personnel divided by 3 equals 55 each year divided by 6 per course gives a yearly course requirement of 9 courses which costs £116,402.40 per year.

1.10 This paper makes representation for the Brigade to invest in the relevant courses discussed above to maintain competency as a priority. The paper recognises the risk-critical nature of working in this environment and notes that to date the Brigade does not meet the NFCC recognised standard.

1.11 Failure to address this gap presents operational, reputational, and legal risk to the organisation. Within the context of modern firefighting, where services are increasingly expected to respond to climate related flooding, complex water environments, and multi-agency incidents, maintaining nationally recognised competence standards is fundamental. Investment in training should therefore be viewed not solely as compliance requirement but as an essential component of modern firefighting, delivering a safe, professional, and future ready emergency service. This investment therefore delivers a dual benefit: improved resilience and response capability for London, as we witness a shift in risk, urban flooding events becoming more frequent, less predictable, and often more complex. In a city like London, that brings unique operational challenges: fast-moving water, infrastructure impacts, people in hard-to-reach locations, and potentially multiple simultaneous incidents.

1.12 The funds are contained within the modern firefighting budget as agreed by the Deputy Commissioner and expenditure will be managed in alignment with the wider modern firefighting programme, ensuring that all key aims outlined within modern firefighting are effectively delivered.

1.13 In the context of modern firefighting and organisational learning following national incidents, continued operation without full compliance may expose the Brigade to foreseeable and avoidable risk. The proposed investment of £569,745 represents a proportionate and structured approach to mitigating that risk while aligning specialist capability with national doctrine and best practice. Furthermore, this funding ensures the Brigade can maintain operational assurance, meet evolving legislative and professional standards, and support the safe and effective deployment of specialist teams. By investing now, the organisation avoids the escalating costs associated with reactive remediation, demonstrates responsible governance, and reinforces its commitment to firefighter safety, public confidence, and resilient service delivery.

1.14 The risks associated with climate driven flooding and complex water environments are directly addressed within the Brigade's Modern Firefighting Programme, which seeks to ensure that LFB's capabilities, skills and operating models remain aligned to current and emerging threats. Within this context, water and flood rescue capability is a core element of modern response delivery, supporting the Programme's objectives around risk-based planning, specialist capability assurance

and operational resilience. Aligning water rescue training with national standards is therefore a practical and necessary expression of the Modern Firefighting Programme in action.

- 1.15** This paper sets out both the Babcock delivery option as well as options available via alternative training providers. It should be noted that the latter may carry additional risk, primarily due to contractual requirements associated with the Babcock training contract. Further details are covered within the procurement commentary at Section 5.9. Any progression of a non-Babcock option would require formal engagement with Babcock. Approval is therefore sought for delegated authority to make the final determination as to how to implement the proposals most effectively within this paper.

2 Objectives and expected outcomes

2.1 The primary objective is to ensure that LFB water rescue operations meet the minimum national standards set out in the NFCC Rescue Boat Code 2021. This will:

- Improve firefighter safety and public confidence in LFB's water rescue capability.
- Ensure LFB is compliant with recognised national standards and reduces liability exposure.
- Provide assurance that LFB can safely deploy water rescue boats in line with prescribed training competencies (Module 3 and Module 4).
- Embedded water rescue capability within LFB's broader modern firefighting strategy, ensuring specialist response functions are evidenced based, nationally aligned and resilient to emerging environmental and operational risks.

2.2 Adoption of the NFCC Rescue Boat Code 2021 ensures that the LFB's water rescue capability reflects the expectations of modern firefighting: standardised training, formalised competence assurance, risk informed deployment, and continuous professional development. This investment demonstrates organisational learning, strengths operational resilience and reinforces public confidence in the Brigade's ability to operate safely in high-risk water

2.3 In addition to improving public protection, the training investment will significantly enhance firefighter safety. Water and flood rescue remains one of the Brigade's most hazardous operating environments. Ensuring that personnel are trained, assessed and re-certified to nationally recognised standards reduces foreseeable risk, improves individual and team decision-making, and enables safer tactical deployment. The enhanced capability simultaneously strengthens London-wide response arrangements while providing firefighters with the competence and confidence to operate safely in fast-moving, unpredictable and high-risk floodwater conditions.

2.4 This proposal represents the first operational capability to be directly funded from the Mayor's Five Million Pound Modern Firefighting allocation. Investment in water rescue training provides an early and tangible benefit from this funding, delivering an immediate uplift in specialist response capability that directly addresses climate -related risk, particularly flooding. The use of Modern Firefighting funding for this purpose demonstrates a clear and transparent link between Mayoral priorities, identified risk and frontline operational delivery.

3 Values Comments

3.1 The LFC notes the Fire Standards Board requirements around adopting and embedding the Core Code of Ethics at an individual and corporate level. Following extensive engagement, the LFC has introduced Brigade values which build on and do not detract from the Code of Ethics.

3.2 Service: The report recommends adopting the NFCC Rescue Boat Code 2021 to ensure water rescue training meets national safety standards. By prioritising firefighter competency and public safety in high-risk water rescue operations, the report directly supports putting the public first.

3.3 Integrity: The report is transparent about the current gap between LFB practice and the NFCC national standard. It clearly sets out the corporate risk if LFB chooses not to align, ensuring that leadership decisions are made with full knowledge of the consequences.

3.4 Teamwork: The proposals recognise that safe water rescue requires trained Module 3 and Module 4 crews working together with consistent competencies across stations.

3.5 Equity: By aligning with NFCC standards, LFB ensures that all staff who perform water rescue have equal access to high-quality training, PPE, and operational guidance. This avoids disparities in preparedness across stations and ensures fairness in how risk is managed.

3.6 Courage: Acknowledging the corporate risk of not adopting NFCC standards requires organisational courage. The report takes a proactive stance, recommending LFB step up to the challenge of resourcing and implementing the training despite financial pressures.

3.7 Learning: The report responds to national learning, including recommendations from the Marine Accident Investigation Branch (MAIB), and embeds continuous professional development (CPD) into the proposal. By committing to ongoing recertification and CPD hours, LFB demonstrates its willingness to learn and improve.

4 Equality Comments

4.1 The LFC and the Deputy Mayor for Planning, Regeneration and the Fire Service are required to have due regard to the Public Sector Equality Duty (section 149 of the Equality Act 2010) when taking decisions. This in broad terms involves understanding the potential impact of policy and decisions on different people, taking this into account and then evidencing how decisions were reached.

4.2 It is important to note that consideration of the Public Sector Equality Duty is not a one-off task. The duty must be fulfilled before taking a decision, at the time of taking a decision, and after the decision has been taken.

4.3 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.

4.4 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.

4.5 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.

4.6 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.

4.7 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.

4.8 The adoption of the NFCC Rescue Boat Code 2021 has been assessed in relation to the Public Sector Equality Duty (PSED) under section 149 of the Equality Act 2010. Consideration of equality impacts has been integrated into this project from the start of discussions around water rescue capability, not as an afterthought.

4.9 Consultation has been undertaken with operational crews, training departments, representative bodies, and staff networks to identify potential barriers for staff with protected characteristics. This included considering the suitability of PPE and equipment for a diverse workforce, ensuring that training venues are accessible, and reviewing rostering implications for those with caring responsibilities.

Evidence gathered during the project includes:

- Feedback from existing Module 3 and Module 4 trained personnel regarding the inclusivity of current training practices.
- Engagement with staff equality networks to identify potential issues linked to gender, religion, and disability (for example, sizing of drysuits and availability of suitable welfare facilities at training venues).
- Liaison with health and safety officers to ensure risk assessments account for additional needs such as reasonable adjustments for staff with disabilities.

- 4.10 The outcome of this consultation is that no adverse equality impacts have been identified that cannot be mitigated. Training providers and procurement teams will continue to review PPE specifications to ensure fair access to all staff. Ongoing monitoring and engagement will take place during the roll-out of training to ensure emerging issues are identified and addressed promptly.
- 4.11 By embedding equality considerations at every stage of planning, the Brigade ensures that the proposed adoption of NFCC standards will be delivered in a way that treats all staff fairly, promotes inclusion, and complies with the statutory duties under the Equality Act.

5 Other considerations

Workforce comments

- 5.1 Implementation of the NFCC Rescue Boat Code 2021 training standards will have direct workforce implications. Aligning to Module 3 (Water and Flood Rescue Technician) and Module 4 (Water and Flood Rescue Boat Operator) requires a structured training and recertification programme across multiple LFB stations.
- 5.2 Consultation has taken place with representative bodies and operational leads to assess the impact on staffing availability, rostering, and training release. While short-term absences will be required to enable crews to attend courses, these will be managed within existing workforce planning arrangements. The use of the current Babcock training contract provides assurance that delivery capacity is available without imposing additional recruitment pressures.
- 5.3 The investment in nationally recognised training standards is expected to improve staff safety, professional competence, and morale by ensuring that all personnel deployed to water rescue operations are trained to a consistent and robust level. This reduces risk to individuals, enhances operational confidence, and supports retention by providing staff with clear professional development pathways.
- 5.4 No adverse workforce impacts have been identified beyond temporary absences for training, which will be mitigated through effective scheduling and communication with station management teams.
- 5.5 Central Operations and Rep bodies to review the above statements and comment additional below.

Sustainability comments

- 5.6 The proposed adoption of NFCC Rescue Boat Code training standards has been considered in relation to environmental and sustainability objectives. Training will be delivered through the existing Babcock contract, which already incorporates measures to reduce environmental impact, including efficient scheduling of training sessions to minimise unnecessary travel and associated emissions.
- 5.7 The use of recognised training venues with established welfare and decontamination facilities supports environmentally responsible practices and reduces the need for ad hoc site set-up. Where new PPE or equipment is required, specifications will take account of sustainability factors such as durability, repairability, and safe disposal.
- 5.8 The alignment with national standards is expected to have a positive long-term sustainability impact by embedding efficient, consistent training delivery and reducing duplication of courses.

Procurement comments

5.9 In preparation of this report, the following delivery options have been considered:

- Secure courses through the existing training contract with Babcock.
- Undertake a tender process under the Procurement Act 2023.
- Deliver training in-house.

A preliminary high-level benchmarking exercise has been carried out using costs provided by the current training provider and two alternative suppliers for water rescue training. These initial findings require validation and inclusion of hotel and catering costs to ensure a like-for-like comparison.

Indicative cost observations:

- Module 3 recertification: Babcock is offering similar costs to suppliers benchmarked.
- Module 4 CPD: To be confirmed awaiting TDI pricing
- Module 4 recertification: An alternative supplier currently offers the lowest price – awaiting accommodation costs to confirm total values.

Summary of Benefits and Risks

Option 1: Existing Training Contract with Babcock

Benefits:

- Compliance with LFC Scheme of Governance and procurement standing orders.
- Continuity of service and shorter lead time to commence training.
- Short timescale to align with NFCC standards.

Risks:

- Limited market testing; potential missed savings.
- Dependence on a single supplier

Option 2: Competitive Tender Process

Benefits:

- Potential cost savings and improved value for money.
- Opportunity to engage wider market and innovative solutions.

Risks:

- Timeframe: Minimum 6 months; longer if site visits or negotiations required.
- Requires significant procurement resource and evaluator input.
- Additional burden of booking and managing accommodation/catering.
- Risk of delays impacting compliance timelines.

Option 3: In House Delivery

Benefits:

- Greater control over training design and delivery.
- Potential long-term cost efficiencies.

Risks:

- No current cost or timescale data; high uncertainty.
- Requires investment in trainers, infrastructure and venue.
- Risk of non-compliance if implementation is delayed.

To determine the preferred option will require further direction on priorities such as speed, compliance, or cost savings.

Recommendation based on current information:

It is recommended to utilise the current training provider to achieve initial compliance and mitigate the risk mentioned within this paper.

Following the initial delivery, further exploration for the remaining stations and ongoing requirement can be reviewed in line with the outcomes from the review of specialist capabilities. This phasing will assist in effective management of the modern firefighting budget.

Communications comments

- 5.10 The adoption of the NFCC Rescue Boat Code 2021 and the associated training requirements for Module 3 and Module 4 will require clear and timely communication across the Brigade. Internal communications will focus on ensuring that operational staff and station management teams are fully informed of the new training standards, scheduling of courses, and the operational benefits of compliance with national requirements. This will be supported by briefings, hotwire updates, and engagement through representative bodies.
- 5.11 Externally, key stakeholders including the Deputy Mayor for Fire and Resilience, the Greater London Authority, and the public may require assurance that LFB is taking proactive steps to align with national safety standards. This will be communicated through governance reporting, inclusion in performance and assurance updates, and where appropriate, public-facing statements that demonstrate LFB's commitment to firefighter and public safety.
- 5.12 The Communications department will coordinate messaging to ensure consistent narratives are delivered to all audiences, highlighting both the safety benefits and the financial efficiency achieved through the streamlined training model.

6 Financial comments

- 6.1 This paper recommends that revenue expenditure of up to £569,745 is agreed for the purposes of water rescue training purposes to align with NFCC standards.
- 6.2 This expenditure will be incurred in 2026/27. If further funding is required for future years this will be covered in future reporting as necessary in line with Governance requirements.
- 6.3 The funding for this report is included as part of the budget process for 2026/27 and will be contained with the £5.0m available for Modernising Firefighting in 2026/27.

7 Legal Comments

- 7.1 This report seeks approval of expenditure for additional training of operational staff in water rescue in order that the Brigade can align itself with NFCC standards.

- 7.2 Under section 9 of the Policing and Crime Act 2017, the London Fire Commissioner ('the Commissioner') is established as a corporation sole with the Mayor appointing the occupant of that office. Section 327D of the Greater London Authority Act 1999, as amended, the Mayor may issue to the Commissioner specific or general directions as to the manner in which the holder of that office is to exercise his or her functions.
- 7.3 By direction dated 1 April 2018, the Mayor set out those matters, for which the Commissioner would require the prior approval of either the Mayor or the Deputy Mayor for Fire and Resilience (the "Deputy Mayor"). Paragraph (b) of Part 2 of that direction requires the Commissioner to seek the prior approval of the Deputy Mayor before "[a] commitment to expenditure (capital or revenue) of £150,000 or above is identified in accordance with normal accounting practices...". Funding of additional water rescue training modules, as detailed in this report, far exceeds the specified amount set out in the Direction, as such, requires the prior approval of the Deputy Mayor.
- 7.4 Section 1 of the Fire and Rescue Services Act 2004 states the Commissioner is the fire and rescue authority for Greater London. The statutory basis for the actions proposed in this report is provided by section 7 and section 5A of the Fire and Rescue Services Act 2004 ('FRSA 2004'). Section 7 (2)(a)FRSA 2004 provides the Commissioner has the power to secure the provision of personnel, services, and equipment necessary to efficiently meet all normal requirements for firefighting. Furthermore, section 7 (2)(b) of FRSA 2004 requires that the Commissioner must secure the provision of training for personnel. Section 5A allows the Commissioner to procure services, and equipment they consider appropriate for purposes incidental or indirectly incidental to their functional purposes.
- 7.5 This report identifies training requirements for the London Fire Brigade necessary to align itself with NFCC national standards in water rescue. Alignment of training with National Operational Guidance [NOG] in general also fulfils recommendations made by His Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS).
- 7.6 The report confirms that the training will be delivered under an existing contract for training services with Babcock Ltd, which has been procured in compliance with the procurement legislation.
- 7.7 The Commissioner has the requisite powers to approve the recommended decision in this report.

List of appendices

Appendix	Title	Open or confidential*
1	NFCC Rescue Boat Code – Module 3 Competency Framework	Open
2	NFCC Rescue Boat Code – Module 4 Competency Framework	Open
3	Equalities Impact Assessment	Open
4	Sustainable Development Impact Assessment	Open

Part two confidentiality

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

Is there a Part Two form: **No**

Appendix 1 - NFCC Rescue Boat Code – Module 3 Competency Framework

NFCC Module 3 - Water and Flood Rescue Technician	
Target group	Specialist SAR personnel.
Scope	<p>This course is aimed at selected SAR personnel. The course introduces appropriate water rescue equipment, including its safe and effective use, and progressively develops an individual to be confident in, on and around moving water. As well as learning how to read the water, an individual will spend time swimming, practising self-rescue techniques and performing in- and on-water rescues as part of a rescue team.</p> <p>The syllabus also includes boat/pathway handling, basic rope rescue techniques and consideration of still water and unstable ground hazards such as mud and ice.</p>
Aim	To train responders to identify their limitations and safely and effectively use appropriate water rescue equipment whilst operating near, on or in moving water.
Minimum delivery hours	Minimum of 26 hours over a minimum of 4 days.
Lead instructor	Water and flood rescue technician instructor.
Instructor ratio	<p>Minimum of 2 water and flood rescue technician instructors to 12 delegates.</p> <p>For every additional suitably qualified instructor the ratio can be increased by a maximum of 4 delegates assessed against the suitability of the training facilities available to ensure appropriate water and instructor contact time.</p>
Pre-requisites	This course can be delivered as a stand-alone course.
Training venue	The water selected for this standard shall be appropriate to the limits of wading rescue with suitable and appropriate hydrology features, up to and including Class 2 water, for all aspects of training to be carried out safely and effectively.
Learning outcomes	<p>Demonstrate water rescue scene management and dynamic assessment of risk:</p> <p>Understand the limitations of the role; rescue team organisation; communication systems; hazard recognition and pre-planning; risk and incident zones; Incident Management Structure, including providing tactical advice; team health, safety and welfare.</p> <p>Identify and apply the role of the water and flood rescue technician within the Incident Management Structure:</p> <p>Team health, safety and welfare; team roles and responsibilities.</p> <p>Apply a working knowledge of hydrology and associated hazards:</p> <p>Recognition of water features and their impact.</p> <p>Have an understanding of search procedures in the water environment:</p> <p>When and how to search; types of search, deployment of teams; sectors, point last seen and areas of possible detection.</p> <p>Identify and use appropriate PPE:</p> <p>Types; standards; donning and doffing; care, maintenance and inspection; record-keeping.</p>

Demonstrate swimming and manoeuvring in moving water:

Ferry glide concept; negotiating obstacles; entry/egress; defensive swimming, aggressive swimming; tethered swims.

Understand and apply relevant rescue techniques:

Talk, reach, throw, row, go/tow, helicopter.

Have a working knowledge of basic boat handling by paddle and rope systems:

Types and suitability of systems, safety briefings, helming skills, tethered boat options, paddling skills, wading skills.

Demonstrate capsize drill skills in a suitable boat or raft and have awareness in powered boat operations in preparation for operating with or being transported by a powered boat team.

Demonstrate rigging and operating of rope systems:

Equipment, anchors, tensioned diagonals, tensioning lines, efficient 3:1 mechanical advantage, knots and hitches.

Have a working knowledge of specialist rescue equipment (where in use by organisation):

Inflatable adjuncts, ropes for water rescue, technical hardware, unstable ground equipment.

Demonstrate techniques for movement in shallow water:

Supported crossing (poles/tethers), 1-2-3 in teams, wedge and line astern, casualty crossing.

Awareness of flooding and associated hazards:

Pollution, location and incident-specific hazards, topography.

Demonstrate casualty management issues specific to the water environment:

Medical problems associated with water, in-water spinal care considerations, managing the non-compliant casualty.

Identify and demonstrate an understanding of the hazards and implications associated with:

Entrapment – supporting tag lines, use of cinches, mud and ice (characteristics, medical issues, extrication techniques).

Contamination

	<p>Locks and sluices – characteristics, design/hydrology, specific rescue techniques.</p> <p>Vehicles and objects in water – behaviour, hydrology, access and stabilisation techniques with flood rescue equipment and safety considerations.</p> <p>Working with helicopters – availability and access, hazards and safety protocols.</p> <p>Animals – hazards and safety protocols.</p> <p>Identify and explain the additional hazards and difficulties associated with working in darkness and reduced visibility and application of suitable control measures:</p> <p>Equipment issues, lighting, additional marking requirements, audible signals.</p> <p>Search:</p> <p>Demonstrate search techniques.</p>
CPD	<p>A minimum of 12 hours per calendar year with a minimum of 2 sessions per year with a maximum gap of 9 months between training sessions. Of the 12 hours, at least 6 hours must be in Class 2 water or water with equivalent features.</p> <p>Recorded activity-based training should cover the following subjects as a minimum:</p> <ul style="list-style-type: none"> • Donning, doffing and care of water rescue PPE • Water rescue incident management • Self-rescue techniques • Throw bag skills • Shallow water crossing techniques • Swift water hydrology
Recertification	<p>Recertification is required every 3 years.</p> <ul style="list-style-type: none"> • Responders with this qualification who have maintained competency using internal or peer-led CPD are required to complete a minimum of 18 hours over a minimum of 3 days with learning outcomes, instructor and instructor ratio and venue as detailed above. • Responders with this qualification who have completed an annual CPD event of 6 hours minimum in duration with at least 4 hours in Class 2 water delivered by suitably qualified instructors meeting the standards above are required to complete 12 hours over a minimum of 2 days with learning outcomes, instructor and instructor ratio and venue as detailed above.

Appendix 2 - NFCC Rescue Boat Code – Module 4 Competency Framework

NFCC Module 4 - Water and Flood Rescue Boat Operator	
Target group	Specialist SAR personnel operating rescue boats powered by engines.
Scope	This course is aimed at selected SAR personnel who are required to operate a powered craft for a range of activities as part of a crew. The course develops water and flood rescue technicians to be able to operate a powered craft in a variety of waters, including still, moving and flood. The course covers basic and advanced boat rescue operations such as casualty pickups, throw lines and evacuations and includes night SAR activities.
Aim	To train technicians to identify their limitations and safely and effectively use powered boats and associated equipment in inland waters and flooding, by day or night, in a wide range of water conditions.
Minimum delivery hours	Minimum of 28 hours over a minimum of 4 days.
Lead instructor	Water and Flood Rescue Boat Operator instructor.
Instructor ratio	Minimum of 1 Rescue Boat Operator instructor per rescue boat to maximum 3 delegates.
Pre-requisites	<ul style="list-style-type: none"> • Water and Flood Rescue Technician • RYA Level 2 Powerboat Handling
Training venue	<p>The water selected for this course shall be appropriate to the limits of a boat-based rescue with suitable and appropriate hydrology features, up to and including Class 2 or marine equivalent, for all aspects of training to be carried out safely and effectively.</p> <p>In the circumstances that only 1 training boat is available with 1 instructor to 3 delegates, a 2nd boat is required. This 2nd boat can only be operated by a competent water and flood rescue boat operator to provide both a safe system of work and a second craft to enable compliance with the learning outcomes.</p>
Learning outcomes	<p>Individuals will demonstrate their ability to perform skills completed during the RYA Level 2 National Powerboat Course, including:</p> <ul style="list-style-type: none"> • Pre-launch checks • Launching • Leaving and coming alongside • Low- and high-speed manoeuvring • Picking up a buoy • Anchoring • Towing • Person overboard • Recovery of boat • IRPCS/Rules of the Road • Basic fault-finding • Emergency procedures <p>Demonstrate boat handling in swift water:</p> <ul style="list-style-type: none"> • Identification of safe launching sites and bail-out sites • Launch and recovery into swift water • Recognition of moving water characteristics and hazards • Vessel limitations • Hull damage, watertight integrity and free surface water effect

	<ul style="list-style-type: none"> • Anchoring • Veering down/Controlled boat lower • Holding station • Stemming the flow and ferry gliding • Use of water features, including eddy currents, lees and wash-outs • Identify the hazards and operate in shallow water • Manoeuvring in swift water, including running with the flow, moving aft over ground, power turns • Closing/bearing away • Coming alongside moving vessels • Suction effects and pressure waves • Closing-down procedures – returning equipment • Reporting faults and problems <p>Paddle boat handling:</p> <ul style="list-style-type: none"> • Use of paddles to manoeuvre and control the craft, in both still and moving water • Capsize avoidance and recovery <p>SAR operations from powered craft:</p> <ul style="list-style-type: none"> • Safety equipment, communication with crew and other agencies • Search techniques and incident management • Methods of recovering personnel from water and techniques for lifting heavy casualties including extended reach rescue and throw line rescues • Swimmer operations (including recovery of rescue swimmer) • Use of loaded lines • Tandem working (e.g. two boats operating together whilst attached by a line) • Twin boat working (e.g. two boats operating together in the same sector or carrying out rescues by use of protected boat, etc.) • Towing and being towed – astern tow and alongside tow, length of tow lines, position to pass a tow, using a bridle, towing alongside, casting off a tow • Approaching, righting and dealing with entrapments from capsized vessels • Dealing with entrapments and capsize of own vessel • Awareness of rescue from vehicles and operating a boat around a vehicle in water (achievable using suitable object providing similar hydrology) • Mass evacuation and use of lily pads • Helicopter rescue procedures • Use of navigation systems • Use of other specialist equipment <p>Boat handling and SAR during darkness and poor light conditions:</p> <ul style="list-style-type: none"> • Practical application of skills in darkness and poor light • Demonstrate ability to keep a proper lookout and identify lit and unlit marks and hazards at night • Students to conduct a SAR scenario in darkness
CPD	A minimum of 12 hours per calendar year with a minimum of 2 sessions per year with

	<p>a maximum gap of 9 months between training sessions. Of the 12 hours, at least 6 hours must be in Class 2 water or water with equivalent features.</p> <p>Recorded activity-based training should cover the following subjects as a minimum:</p> <ul style="list-style-type: none"> • Launching and recovery • Manoeuvring the boat: forwards, reverse and holding off • Coming alongside, mooring and swift off • Low- and high-speed manoeuvring • Person overboard • Shallow water operations • Use of navigation system
Recertification	<p>Recertification is required every 3 years.</p> <ul style="list-style-type: none"> • Responders with the Water and Flood Rescue Boat Operator qualification who have maintained competency using internal or peer-led CPD are required to complete a minimum of 18 hours over a minimum of 3 days with learning outcomes, instructor and instructor ratio and venue as detailed above. • Responders with the Water and Flood Rescue Boat Operator qualification who have completed an annual CPD event of 6 hours minimum in duration with at least 4 hours in Class 2 water delivered by suitably qualified instructors meeting the standards above, are required to complete 12 hours over a minimum of 2 days with learning outcomes, instructor and instructor ratio and venue as detailed above.



LONDON FIRE BRIGADE

Equality Impact Assessment (EIA) Initial Screening Form

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

This form enables you to screen each protected characteristic and identify which may be positively or negatively impacted by your activity.

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 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.**

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.

You will only be required to complete a full EIA assessment of the areas where you have identified a negative impact, and further adjustments will be required.

Use the fields below to record any impacts and potential mitigating actions against each protected characteristic. All complete initial screening forms should be submitted to the EIA team to review and confirm your next steps.



LONDON FIRE BRIGADE

Equality Impact Assessment (EIA) Initial Screening Form

A. Name, status and expected outcomes of the activity

Water rescue. This is to bring the LFB in alignment with National Operational Guidance (NOG).

it includes evacuation functions where personnel directly assist with the evacuation of people or lead them to a place of relative safety.

Local arrangements, such as memoranda of understanding (MoUs) and mutual aid arrangements with neighbouring fire and rescue services and other organisations, should consider the benefits of co-operation and communication between emergency responders involved. This should include the handover of casualties at the scene of the incident to the appropriate organisation or responsible person.

To include:

- Level 1 water operations
- Level 2 water operations
- Level 3 water operations
- Incidents on the river Thames

Department for Environmental Food and Rural Affairs (DEFRA)- Flood Rescue Concept of Operations

DEFRA is the national concept of operations which outlines the water rescue requirements nationally which is the fundamental part of this policy

- Module 1 water Awareness- General water safety awareness training and basic land-based rescue techniques
- Module 2 Water First responder- to work safely near and in water using land-based and wading techniques
- Module 3 Water Rescue Technician- Specialist rescue operations
- Module 4 Water rescue boat Operator- Rescue boat operation
- Module 5 Water Rescue – Water related incident command
- Module 6 Water Rescue Incident Tactical Adviser- To provide tactical advice at a flood or water rescue incident.



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Equality Impact Assessment (EIA) Initial Screening Form

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

This applies to all Operational Fire Fighters that may have to carry out operational duties in or near to a water environment.

C. Reason for Equality Impact Assessment



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Equality Impact Assessment (EIA) Initial Screening Form

Having due regard to Public Sector Equality Duty (PSED), this EIA is being performed to assess the effect this policy and supporting material has on LFB's workforce.

The Implementation of National operational guidance (NOG)" and it's supporting material define processes and procedures which directly support the legislative requirements for incidents where fire and rescue service personnel need to search for people and rescue casualties in or near to a water environment.

[Public Sector Equality Duty](#)

[Equality Act 2010](#)

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

LFB [Values](#)

People Services Strategy

Grey Book

[LFB Equity Policy](#)

[Protected characteristics resource library](#)

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

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

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

[The LFB key EDI terminology](#)

HRE36 [Meeting the religious, spiritual and pastoral care needs of staff](#)

[Role to rank collective agreement 2019](#)

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

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

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

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

Policy No. 969 [Menopause policy](#)

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



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Equality Impact Assessment (EIA) Initial Screening Form

Policy No. 538 [Annual leave and public holiday leave allocation policy – operational staff](#)
Policy No. 651 [Station allocation and transfer policy](#)
Policy No. 788 [Electronic Personal Record File \(E-prf\) policy](#)
Policy No. 327 [Guidance for senior managers in relation to mobilising and rota management](#)
Policy No. 538 - [station based establishment and skills requirements](#)
[Role to rank collective agreement 2019](#)
Policy No. 512 – [Special leave policy](#)
Policy No. 888 – [Partial attendance policy](#)
Policy No. 1008 – [Trade union time off and facilities policy](#)
Policy No. 965 – [Equality support groups](#)
Policy No. 251 – [Station Working Routines](#)

It is recognised that when performing its regulatory role, LFB will regularly deal with persons outside of the LFB workforce. The PSED applies equally to LFB's external activities, such as our dealings with members of the public, third parties and external agencies. As such, due consideration has been given to the PSED in respect of our external activities when devising this policy.

D. Team responsible for the activity

EIA Author(s):

Name: Stephen McGhie
Job title: Station Commander
Department: Operational learning

EIA Owner(s):

Name: Ian Simpson
Job title: Station Commander
Department: Operational learning



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Equality Impact Assessment (EIA) Initial Screening Form

E. Equality and diversity considerations					
Protected Characteristic	Positive Impact ✓	Negative Impact ✓	Summary of impact	Is a mitigating action required?	
				Yes	No
Age	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>To ensure staff across all age groups obtain the skills they need to perform their designated role and to advance in their career, LFB provides suitable and sufficient training in matters pertaining to the activity and its supporting documents.</p> <p>There is a relationship between the accessibility of digital resources and age. As working lives get longer, individuals must adapt to the pace of change. It is recognised that older staff may be at greater risk of lower digital literacy, meaning there are potential risks regarding their ability to assimilate learning that uses technology. To mitigate the potential risks and to ensure relevant training material is fully accessible for staff with different learning needs, staff across all age groups are provided with classroom training that has been devised with due consideration to relevant inclusion guides and policies. These include the LFB “Accessible Communication Guide” and LFB Policy Note 0553, “Learning Support Policy”. It is considered that the provisions of activity do not negatively disproportionately impact staff with this protected characteristic.</p> <p>LFB Age Data for staff within FRS Occupational Group @ 31 March 2026 is as follows: Total number of staff making up FRS Occupational group = 5839 FRS Staff= 1004 Age 29 and under: 125 (12.5%), Age 30-39: 247 (24.6%), Age 40-49: 228 (22.7%) Age 50-54: 118 (11.8%), Age 55-59: 136 (13.5%), Age 60+: 150 (14.9%) Control staff=146 Age 29 and under: 29 (19.9%), Age 30-39: 44 (30.1%), Age 40-49: 23 (15.8%)</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



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Equality Impact Assessment (EIA) Initial Screening Form

			<p>Age 50-54: 20 (13.7%), Age 55-59: 12 (8.2%), Age 60+: 18 (12.3%) Operational staff= 4693 Age 29 and under: 505 (10.8%), Age 30-39: 1378 (29.4%), Age 40-49: 1827(39.0%) Age 50-54: 687 (14.7%), Age 55-59: 233 (5.0%), Age 60+: 59 (1.3%)</p>		
Disability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>LFB has a duty to make reasonable adjustments for staff within this protected group. The provision of reasonable adjustments for staff within this protected group ensures that a person is not treated less favourably or placed at a substantial disadvantage because of their disability. Neurodiversity is recognised as a disability under the Equality Act (2010) and it is recognised that text-heavy policies may be overwhelming for neurodivergent staff and that staff with visual or auditory impairments could struggle to access the policy. To ensure material is fully accessible to each person’s individual need, this policy and its supporting documents have been formulated with due consideration to relevant inclusion guides and policies, including the LFB “Accessible Communication Guide” and LFB Policy Note 0553, “Learning Support Policy”.</p> <p>The policy considers adjustments that must be made to ensure accessibility considerations for individuals with physical disability or for those experiencing conditions which meet the Equality Act’s definition of “impairment”. It is acknowledged that the implementation of workplace adjustments eliminates discrimination and provides advancement of opportunity for those with a disability. This in turn allows staff with or without this protected characteristic to access and use these policy provisions thereby ensuring all staff performing the regulatory roles to which this policy applies, can foster and maintain good working relationships with colleagues.</p> <p>Each operational firefighter must undergo a fitness assessment. If a firefighter passes this</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



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Equality Impact Assessment (EIA) Initial Screening Form

			<p>assessment, they are physically able to use this equipment. They are then trained on how to do so, and therefore we anticipate a positive impact on this characteristic</p> <p>LFB disability data for staff within FRS Occupational Group @ 31 March 2026 is as follows: Total number of staff making up FRS Occupational group = 5839 Control staff = 146, Disabled 28 (19.2%), Not disabled: 110 (75.3%), Information not provided: 6 (4.1%), Prefer not to say: 2 (1.4%) FRS staff = 1004, Disabled 124 (12.4%), Not disabled: 786 (78.3%), Information not provided: 73 (7.3%), Prefer not to say: 21 (2.1%) Operational staff =4693, Disabled 390 (8.3%), Not disabled: 4098 (87.4%), Information not provided: 165 (3.5%), Prefer not to say: 36 (0.8%)</p>		
Gender Reassignment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The LFB does not currently record DEI staff data for gender reassignment but for the purposes of this EIA it has been acknowledged that across all staffing groups, there are staff within the workforce who are either undergoing or have completed a gender transition. Due regard has been given to LFB Policy Note 323 “Trans Inclusion Policy” when formulating the provisions of activity and its supporting documents.</p> <p>It is considered that the policy provisions/activity of activity does not negatively disproportionately impact staff with this protected characteristic.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Marriage / Civil Partnership	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>LFB does not currently record DEI staff data for marriage and civil partnerships but for the purposes of this EIA it has been acknowledged that across all staffing groups, there are staff within the workforce who are either married or are in a civil partnership.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



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Equality Impact Assessment (EIA) Initial Screening Form

			It is considered that the policy provisions/activity of activity does not negatively disproportionately impact staff with this protected characteristic.		
Pregnancy / Maternity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>LFB does not currently record DEI staff data for pregnancy and maternity but for the purposes of this EIA it has been acknowledged that there are staff within the workforce who are or have been pregnant and / or on maternity.</p> <p>However, it is recognised that pregnancy can cause discomfort or limitations in both sedentary and physical activities, which could affect how a person performs tasks that are part of this role. Due regard has been given to LFB Policy Notes PN 555 “Family Support Leave (including Maternity)” and PN 313 “Maternity provisions” which provide for workplace adjustments to be made in respect of expectant mothers. It is recognised that, having regard to these policies, managers will undertake a risk assessment (RA) as per LFB Policy 673. The RA process will be performed with due regard to LFB’s Pregnancy - Possible Risks Guide. This guide contains sections on “general precautionary measures”, “manual handling of loads” (which covers physical work), “extremes of cold and heat” and “movements and postures” to assist managers in the implementation of mitigating measures such as i) introducing frequent rest breaks to reduce fatigue or ii) reducing physical activities to ensure staff within this protected group are fully supported in their role which in turn supports access to the policy provisions of PN489.</p> <p>It is considered that the policy provisions of activity do not negatively disproportionately impact staff with this protected characteristic.</p> <p>Due consideration has been given to LFB’s Health and Safety Policy PN 597, specifically para 4.30 which states that managers are responsible for “Assessing the risks to the health and safety of their employees and any other person(s) affected by the Brigade’s work activities</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



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Equality Impact Assessment (EIA) Initial Screening Form

			<i>in accordance with its policies and procedures and, where possible, the elimination or reduction of those risks.” It is considered that activity and its associated policies provides appropriate mitigation for potential risks relating to occupancy types.</i>		
Race	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Due regard has been given to LFB Policy Note PN 973 “LFB Equity Policy” and the LFB “Inclusion Strategy” when formulating the provisions of activity and its supporting material.</p> <p>It is considered that the policy provisions of activity do not negatively disproportionately impact staff across different ethnicities.</p> <p>LFB Ethnicity Data for staff within FRS Operational Occupational Group @ 31 March 2026 is as follows:</p> <p>Total number of staff making up FRS Occupational group = 5839 Control staff = 146, Ethnically underrepresented group 30 (20.5%), Not known:7 (4.8%), Prefer not to say: 0 (0%), White: 109 (74.7%) FRS staff = 1004, Ethnically underrepresented group 320 (31.9%), Not known:68 (6.8%), Prefer not to say: 7 (0.7%), White: 609 (60.7%) Operational staff =4689, Ethnically underrepresented group 746 (15.9%), Not known: 168 (3.6%), Prefer not to say: 65 (1.4%), White: 3710 (79.1%)</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Religion / Belief	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Due regard has been given to LFB Policy Note PN 973 “LFB Equity Policy” and the LFB	<input type="checkbox"/>	<input checked="" type="checkbox"/>



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Equality Impact Assessment (EIA) Initial Screening Form

			<p>“Inclusion Strategy” when formulating the provisions of activity.</p> <p>It is considered that the policy provisions of activity do not negatively disproportionately impact staff across different religions or beliefs.</p> <p>Where staff require time to pray while carrying out their job roles, to ensure they are not disadvantaged, LFB’s Inclusion Policies highlight the rights of staff to practice their religious duties without restriction. It is recognised that LFB’s regulatory activities can potentially clash with activities relating to a member of staff’s religion or belief, such as with the timing activities/training. The inclusion policies allow for adjustments to be made that support the religious needs of those undertaking activities thereby providing suitable mitigation to ensure those within this protected group are not disadvantaged because of their religion or belief.</p> <p>LFB Religion/Belief Data for staff within FRS Occupational Group @ 31 March 2026 is as follows:</p> <p>Across the FRS staff group, 2394 (41%) of staff are recorded as having no religion. Christian is recorded at 1840 (31.5%) with other religions or belief recorded as: Muslim 130 (2.2%), Hindu 53 (0.9%), Other 179 (3.1%), Sikh 21 (0.4%), Buddhist 62 (1.1%), Jewish 18 (0.3%).</p> <p>932 (16%) of respondents gave no information whilst 210 (3.6%) preferred not to say.</p>		
<p>Sex</p>	<p><input checked="" type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p>Due regard has been given to LFB Policy Note PN 973 “LFB Equity Policy” and the LFB “Inclusion Strategy” when formulating the provisions of PN 489.</p> <p>It is considered that the policy provisions of activity do not negatively disproportionately</p>	<p><input type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>



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Equality Impact Assessment (EIA) Initial Screening Form

			<p>impact staff across different sex.</p> <p>Due regard has also been given to Policy Note 969 “Menopause Policy”. PN 969 asserts that LFB will also discharge its responsibilities accordingly by specifically providing support to staff within this group, including those experiencing menopause symptoms, to access management support. It is considered that the policy provisions of activity and its supporting material have no gender restrictions across the mix of genders so eliminates discrimination and provides advancement of opportunity for those in the female minority across all staff groups. Having no gender restrictions promotes good working relationships between the genders and provides opportunity for all staff to use these provisions.</p> <p>LFB Gender Data for staff within FRS Occupational Group @ 31 March 2026 is as follows: The gender breakdown of staff is 1121 (19.2%) female and 4718 (80.8%) male as a total across all staffing groups.</p>		
<p>Sexual Orientation</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Due regard has been given to LFB Policy Note PN 973 “LFB Equity Policy” and the LFB “Inclusion Strategy” when formulating the provisions of activity.</p> <p>It is considered that the policy provisions of activity do not negatively disproportionately impact staff across different sexual orientation.</p> <p>LFB sexual orientation Data for staff within FRS Occupational Group @ 31 March 2026 is as follows: Total number of staff making up FRS Occupational group = 5839 Control staff = 146, Heterosexual 104 (71.2%), LGB 16 (11%), Not provided 20 (13.7%) Prefer not to say: 6 (4.1%) FRS staff = 1004,</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



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Equality Impact Assessment (EIA) Initial Screening Form

			<p>Heterosexual 756 (75.3%), LGB 70 (7%), Not provided 152 (15.1%) Prefer not to say: 26 (2.6%)</p> <p>Operational staff =4689, Heterosexual 3372 (71.9%), LGB 287 (6.1%), Not provided 893 (19%) Prefer not to say: 137 (2.9%)</p>		
Socio Economic*	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The LFB does not currently record DEI staff data for socio-economic backgrounds, but for this EIA it has been considered across all staffing groups in the workforce.</p> <p>Due regard has been given to LFB Policy Note PN 973 “LFB Equity Policy and the LFB “Inclusion Strategy” when formulating the provisions of activity and its supporting material. It is considered that the policy provisions of activity have no restrictions to staff based on their socio-economic background.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Caring responsibilities*	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The LFB does not currently record DEI staff data for caring responsibilities, but for this EIA it has been considered across all staffing groups in the workforce. Due regard has been given to LFB Policy Note PN 448 “Working with Choice” when formulating the provisions of activity and its supporting material. activity allows flexibility around working hours and would cover care responsibilities.</p> <p>It is considered that the policy provisions of activity have no restrictions on staff with caring responsibilities.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explain why a full EIA is not required:



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Equality Impact Assessment (EIA) Initial Screening Form

A full EIA form is not needed because this item can be used equitably by those who need to use it, and that the needs of each protected characteristic have been considered in the use of this item.

Signed by the Submitter

Name: Stephen McGhie

Rank/Grade: Station Commander

Date: 21/04/2026

Email the completed form to EqualityImpactAssessment@london-fire.gov.uk



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Equality Impact Assessment (EIA) Initial Screening Form

To be completed by the EIA team, and returned to the submitter:

Initial Recommendations		
<input type="checkbox"/>	Further information required	Insufficient information to support a recommendation
<input checked="" type="checkbox"/>	Continue with no change required [Recommendation 1]	No adverse impact(s) identified and full explanations provided
<input type="checkbox"/>	Full EIA required for affected characteristic before proceeding further	Adverse impact(s) identified
Next steps		
No further action required		
Name:	Tanya	Wijesinghe
Date:	24/04/2026	

Amendments Post Sign Off



LONDON FIRE BRIGADE

**Equality Impact Assessment (EIA)
Initial Screening Form**

Sustainable Development Impact Assessment Checklist

Project Name/ Policy Name & No: in addition to PN979. Water rescue national operational guidance alignment

Contact Person: Stephen McGhie

Date completed: 21/04/2026

Please send through the completed checklist with a copy of the project PID or the draft policy to environment@london-fire.gov.uk. For existing policies undergoing minor amendments, please send through a marked up copy of the policy, with the original SDIA.

Other impact assessments completed						Yes	No
1. Has an Equalities Impact Assessment been completed?						<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Has a Health, Safety and Wellbeing assessment been completed?						<input type="checkbox"/>	<input checked="" type="checkbox"/>
Environmental Impacts							
3. Will this consume any of the following (please tick those that apply and state how and if this would increase or decrease our consumption):							
Gas	<input type="checkbox"/>	Electricity	<input checked="" type="checkbox"/>	Water	<input type="checkbox"/>		
Petrol or diesel	<input checked="" type="checkbox"/>	Hazardous chemicals	<input type="checkbox"/>	Other natural resources e.g. timber	<input type="checkbox"/>		
Comments: This is the product pack for the implementation of National Operational Guidance (NOG) for water rescue							
4. Will this produce or reduce our production of (please tick those that apply and describe what and how):							
Non-hazardous waste	<input type="checkbox"/>	Hazardous waste (see PN 862)	<input type="checkbox"/>	pollutants to air, land or water?	<input type="checkbox"/>		
Comments: This is to align the LFB polices with NOG with regards to water rescue.							
5. Will this impact (positively or negatively):						Yes	No
a. Operational/business travel by staff						<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Travel/deliveries by our suppliers						<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Environmental protection at incidents						<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. a Site of Special Scientific Interest						<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Gardens or other wildlife at stations/brigade sites (e.g. nesting birds or bats)						<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments:							

Click here to enter text.

Procurement	Yes	No
6. Will this result in the purchase of goods, services or works or influence how they are procured?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Is this for a purchase of greater than £1m?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Will this use/result in a tender for manufactured goods such as electronics, textiles, and building materials?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Will this service require low skilled/low paid employees?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. Will the goods consume utilities or consumables?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j. Does this involve major works taking place?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
k. If so are BREEAM and Ecological surveys required?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
l. Will this support future cost avoidance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
m. Could all or part of the purchase be provided by small or local businesses?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
n. Could this be delivered by a voluntary/community sector organisation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
o. Has a Request For Tender been submitted to Procurement through hotwire?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments: Click here to enter text. N/A		

For the SD Team to complete:

Policy sustainability risk rating: Low

Inputs/outputs/ impacts to address in Full SDIA: **A full SDIA is not required. This policy goes along with PN979- Rescue.**

Date completed: 22/04/2026 EW