

## FULL EQUALITY IMPACT ASSESSMENT/EQUALITY ANALYSIS

### FORM HRFEIA

<b>Name of Proposal (Policy, Decision, Strategy, Service, Function, Other (Please indicate))</b>	Replacement for the PS 7000 SCBA sets to Northwest Fire & Rescue Services (NWFRS) (Cheshire, Cumbria, Greater Manchester, Isle of Man, Lancashire, Merseyside and Northern Ireland) To replace front line SCBA and telemetry. Specification which are robust, responsive, design to comply with all current UK Acts and Regulations and with Standards BS EN conforming to a minimum ISA-12.12.01-2007 Non incentive Electrical Equipment for Use in Class I and II, Division 2, groups C IEC 60950-1:2005+A1:2009+A2:2013 Information Technology Equipment To procure new Breathing Apparatus Sets and ancillary equipment that can deliver the best respiratory protection and safety of the regions' firefighters.
<b>Name Lead Officer Job Designation</b>	LFRS Equipment & BA Officer
<b>Department</b>	LFRS Fleet & Engineering
<b>Telephone Number E-Mail Address</b>	07810503566 rodneysteele@lancsfirerescue.org.uk
<b>Date of Assessment/Analysis</b>	28/05/25

We carry out Full Equality Impact Assessments (EIA)/analysis where we are unsure or know that the proposal/policy/decision will have an impact on an equality group or further to completing an initial analysis negative impacts have been identified. The EIA should be undertaken/started at the beginning of the proposal/policy development process before any decision is made. It will be updated through the decision making/policy development process to inform the decision-making process and then it is completed.

### 1. Overview

<b>The main aims/objectives of this proposal (project, function, service, policy<sup>1</sup> )</b>
The following is to tender from a Framework Agreement: To supply front line fire appliances with a new enhanced Self-contained Breathing Apparatus. They shall meet the demands of the operational fire-fighting environment. The use of SCBA in Lancashire Fire and Rescue Service (LFRS) and the Northwest region shall meet the health and safety commitments are combined with the environmental and employee wellbeing commitments into one Safety, Health, and Environment Policy.

<sup>1</sup> Policy refers to any policy strategy, procedure, function decision or delivery of service

The wider management systems break down aspects of risk within LFRS and the region and detail how as organisations are going to establish risk controls and required actions to achieve compliance with the wider safety, health, and environmental legislation.

**Is the policy or decision new or under review or existing<sup>2</sup>**

New/Proposed

Modified/Reviewed/Updated/Adapted

Existing but new EIA

**List the groups of people potentially affected by this proposal (e.g. job applicants, employees, customers, members of the public):**

All members of operational staff within the Northwest Region Fire and Rescue Services who will be attending incidents or training exercises applicable to their rank/role or instructed by the incident commander.

**2. Findings/Evidence**

**Findings/Evidence: The following information/data has been considered in developing this proposal (This may include census data, the results of any consultation with community groups or representative bodies.)**

<b>What did you do/consider?</b>	<b>What did it say/What are your findings.</b>
<p><b>List any consultation with employee voice groups, employees, unions, members of the public.</b></p> <p><b>List any methods used to analyse data to understand the impact on people (e.g. work force census profiles, performance, incident data)</b></p>	<p>Working vice groups have now feed back in from the consultation period with their comments and findings added to this EIA.</p>
<p>Framework Agreement for Supply and Delivery of Emergency Response Equipment and Associated Services C002687.</p> <p>BS EN469: 2020 Level 2</p>	<p>The documents detail the names of suppliers who make the SCBA and telemetry which meets the required standard. To procure new Breathing Apparatus Sets and ancillary equipment that can deliver the best respiratory protection and safety of the regions' firefighters.</p> <p>This equipment will be: -</p>

<sup>2</sup> To tick the box: right click, properties, click check the box

	<ul style="list-style-type: none"> <li>- Fit for purpose and meet a high standard of user expectations for ease of wear, operation and use</li> <li>- Latest technology to include telemetry enhancements will be used to support the user's safety and comfort</li> <li>- In line with H&amp;S requirements</li> </ul> <p>The standard details the composition of the SCBA which is required to ensure the safety of operational staff. The construction does not contain any animal products. All of the components are tested in their entirety all products have had an upgrade in certain areas. Further findings to come out from the evaluation in September.</p>
Feedback from the NorthWest evaluation Group	This has been completed with positive feed back prior to implementation into service.
Consultation with HSEAG	Progress no concerns in relation to the proposal
Consultation with Unions	FBU and UNISON representatives included in initial consultation, no objections received to date – will update at close of consultation period w/c 01/03/25
Consultation with Employee Voice Groups	Revised EIA circulated to all Employee Voice Groups for comment and updated is in process to the draft copy..

### 3. Equality Impact

Using the table below please indicate what impact will the implementation of this proposal have on people who share characteristics protected by the Equality Act 2010.

<b>Equality</b>	<b>Positive Impact</b> It could benefit	<b>Negative Impact</b> It could disadvantage	<b>Neutral / No Impact</b>	<b>Reason why there is a positive and negative impact</b> and any mitigating actions already in place to reduce any negative impact
<b>Age</b> People of all ages			x	<p>The Breathing Apparatus (BA) set can be used by all operational staff of any age.</p> <p>Masks are of various sizes and will fit everyone. Mask fitting will be carried out by a qualified technician.</p> <p>Height adjustment - in height for disability or sex. The set should adjust to enable users of differing heights to wear.</p>

<p><b>Disability</b> Physical, Learning Disability Learning Difficulty Mental Health, Carers of disabled people</p>		<p>x</p>	<p>To wear BA, users need to pass fitness and medical tests as per policy. Where applicable, reasonable.</p> <p>Set adjustment to facilitate those living with a stoma/diabetes. Given the positioning and requirement of waist straps it may impinge on the stoma or diabetes pumps which are often worn around the waist.</p> <p>Adjustments can be made for staff with these conditions.</p> <p>Grip/hand use to facilitate airflow and/or set displays. Consideration should be given to individuals who may have reduced use of their digits or hands. Individuals may be able to meet the entry requirements and maintain grip strength however with reduce dexterity the set should enable the flow of air and use of gauge.</p> <p>Learning disabilities - hearing aids can be used the size and readability of the text/icons on any electronic screens will be in accordance with neurodiverse users. The equipment can be fitted with special frames to allow for users wearing spectacles.</p> <ul style="list-style-type: none"> <li>• <b>Hypersensitivity:</b> <ul style="list-style-type: none"> <li>• Loud or unexpected noises can trigger anxiety, stress, and sensory overload.</li> <li>• Specific frequencies, like high-pitched tones or repetitive noises, can be particularly distressing.</li> <li>• Example: A child with autism might become overwhelmed by the noise of a playground.</li> </ul> </li> <li>• <b>Hyposensitivity:</b> <ul style="list-style-type: none"> <li>• Some individuals with ADHD may find that high levels of noise or complex sounds actually help them focus or reduce boredom.</li> </ul> </li> </ul>
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				<ul style="list-style-type: none"> <li>• Example: An individual with ADHD might find it easier to concentrate in a busy office environment than in a quiet room.</li> <li>• <b>Individual Differences:</b> <ul style="list-style-type: none"> <li>• Neurodivergent individuals can have very different responses to sound, and what is considered comfortable or bothersome can vary widely.</li> <li>• Complete silence can also be disorienting or anxiety-provoking for some individuals.</li> </ul> </li> <li>• <b>Sound Masking:</b> <ul style="list-style-type: none"> <li>• Sound masking, which involves creating a constant, low-level background noise, can help to reduce the impact of disruptive noises in a workspace, <a href="#">according to Remark Group</a>.</li> <li>• Example: A sound masking system in a classroom can help to mask distracting conversations or noises.</li> </ul> </li> <li>• <b>Pink Noise:</b> <ul style="list-style-type: none"> <li>• Pink noise, which has a balanced and calming sound profile, may be a good alternative for neurodivergent individuals who find other noise types too stimulating, <a href="#">says Life Skills Advocate</a>.</li> <li>• Example: Pink noise can be used as background music to help reduce anxiety in a classroom or workplace.</li> </ul> </li> <li>• <b>Reduce Noise Levels:</b> <ul style="list-style-type: none"> <li>• Minimize disruptive noises and echoes in environments where</li> </ul> </li> </ul>
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				<p>neurodivergent individuals are present, <a href="#">suggests Danfloor</a>.</p> <ul style="list-style-type: none"> <li>• <b>Control Frequency:</b> <ul style="list-style-type: none"> <li>• Consider the impact of different sound frequencies and choose options that are less likely to be triggering for sensitive individuals.</li> </ul> </li> <li>• <b>Provide Options:</b> <ul style="list-style-type: none"> <li>• Offer a variety of soundscapes and noise levels to accommodate individual preferences, <a href="#">according to Milliken</a>.</li> </ul> </li> <li>• <b>Individualization:</b> <ul style="list-style-type: none"> <li>• Recognize that everyone's sensory experience is unique and that individual needs should be considered.</li> </ul> </li> </ul>
<b>Gender Identity/ Gender Reassignment</b>			x	Anybody can use this equipment as long as they pass the fitness and medical tests.
<b>Pregnancy and Maternity</b>			x	<p>Female firefighters as soon as they are aware they are pregnant further to a risk assessment are taken off operational activity to protect themselves and the unborn child. This policy decision is taken in line with national FRS guidance and the inability to control what incident types a pregnant firefighter would be exposed to.</p> <p>New and expectant mothers undergo a person specific risk assessment with their line manager with support from the Occupational Health Unit which ensures that health and safety is ensured through the pregnancy when they are in workplace and upon return after childbirth.</p>

				Full training and testing will be given on return to work in line with LFRS Training policies.
<b>Race</b> Ethnicity Nationality			x	<p>It is recommended that head coverings, such as hijabs, patkas, and kippahs/yarmulkes should be made of natural fibres.</p> <p>Hijabs have been tested with the breathing apparatus and suitable hijabs to wear under BA Firehoods can be ordered, if necessary. A separate EIA for hijabs has been written in consultation with the Inclusion Team.</p> <p>Due to the facemask head harness, turbans worn by Sikhs are not permitted in accordance with Section 6 of the Deregulation Act 2015 (which came into force on 1 April 2015) and which amends Sections 11 and 12 of the Employment Act 1989. Devout male Sikh operational staff can alternatively wear their hair in a top knot. However, it should be pointed out that the main issue of wearing BA sets does not pertain to hair length nor the wearing of a helmet, but the effectiveness of the face mask seal.</p> <p>Regarding facial hair due to religious beliefs, firefighters have to be clean shaven to comply with RPE legislation. We have investigated alternatives but if the manufacturers' advice is that wearers need to be clean shaven in such a way that facial hair does not affect the face seal, we must comply with their instructions as an approved code of practice. Allowing facial hair is considered as an intolerable risk as per HSE guidelines, there is therefore the potential for a negative impact.</p>
<b>Belief or Religion</b>			x	Anybody can use this equipment if they pass the fitness and medical tests
<b>Gender</b> Men/Women			x	<p>Users with long hair should follow guidelines.</p> <p>The main issue of wearing BA sets does not pertain to hair length nor the wearing of a helmet, but the effectiveness of the face mask seal.</p>

				The equipment will be lighter and more ergonomic, hence, and therefore this has a positive impact where strength can be a challenge. This will be evaluated at the trials in September, but data is already showing it will be lighter from the suppliers.
<b>Sexual Orientation</b> Lesbian, Gay, bisexual and straight people			x	There is no adverse impact on this group
<b>Marriage and Civil Partnership</b> (employment only)			x	There is no adverse impact on this group
<b>Other groups who are not protected under the Equality Act</b> Examples include social economic factors (i.e. poverty, isolation), unemployment, homelessness, rurality, health inequalities any other disadvantage.			x	There is no adverse impact on any other group
<b>Contributes to equality of opportunity</b>			x	No
<b>Contributes to fostering good relationships between different groups</b>			x	No
<b>The decision will be taken in compliance</b>	Yes			x
	No			

<b>with Human Rights</b> <sup>3</sup>		
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#### 4. Outcome of the Equality Impact Assessment: Actions to be taken

<b>What course of action does the Equality Impact assessment Suggest you take</b>	
<b>Outcome 1 - No major change required</b> The EIA has not identified any potential discrimination or adverse impact and all opportunities to promote equality have been taken.	<input checked="" type="checkbox"/>
<b>Outcome 2 - Adjust the policy</b> To remove the negative impact identified in the EIA or to promote better equality.	<input type="checkbox"/>
<b>Outcome 3 - Continue with the policy despite negative impact – Stop and Think</b> You need to ensure the Equality Impact Assessment clearly sets out the justification for continuing with it. You should consider whether there are sufficient plans to reduce the negative impact and to monitor impact. Complete the EIA Action Plan.  If you are continuing with the policy despite the negative impact you need to seek guidance from the Head of Human Resources as this shows the EIA demonstrates a significant impact on people with a protected characteristic	<input type="checkbox"/>

#### 5. Equality Impact Assessment/ Analysis Action Plan and Review

As a result of performing this analysis, what actions are proposed to remove or reduce any negative impact of adverse outcomes identified on people (employees, applicants, customers, members of the public) who share characteristics protected by the Equality Act 2010 or who are non-legislative characteristics.

Further action required: Yes  No

<b>Impact identified on the Protected Characteristics</b>	<b>Action Required</b>	<b>Responsible Officer</b>	<b>Completion Date</b>	<b>Review Date</b>

<sup>3</sup> Human Rights are the basic rights and freedoms that belong to every person in Europe regardless of nationality and citizenship. Human Rights are based on the five FREDA principles: Fairness, Respect, Equality, Dignity, Autonomy.


**5.1 The completed EIA should be attached to the management/project report, so the details can be considered as part of the decision-making process at the relevant Board/Meeting.**

**5.2 Update the EIA monitoring spreadsheet on the R Drive.**

**Equality Impact Assessment Approved By: Asst Director HR**

**Date Approved:**