

Equality Impact Analysis (EqIA)

(Also known as Equality Impact Assessment, People Impact Assessment)

Policy / Project / Function:	NFCC PPE and Clothing Committee			Date of Analysis	24 th September 2020		
Analysis Rating: please tick 1 box ✓ (See Completion Notes)	RED	AMBER	GREEN	✓	Proportionate means achieving a legitimate aim/can be objectively justified.		
Please list methods used to analyse impact on people (e.g. consultations forums, meetings, data collection).	<p>End user feedback through consultation processes and staff surveys. Lessons learnt from procurement projects, health and safety returns and near miss/accident investigation outcomes. Research documents, technical literature and discussions with industry providers. Project board and contract management meetings including review of critical success factors and key performance indicators.</p> <p>https://www.bsigroup.com/globalassets/localfiles/en-my/product-certification/diversity-in-ppe-whitepaper-en-my.pdf</p>						
Please list any other policies that are related to or referred to as part of this analysis	No specific overarching policy as each project/work stream has their own strategy						
Please list the groups of people potentially affected by this proposal. (e.g. applicants, employees, customers, service users, members of the public).	Applicants, employees and members of the public						
What are the aims and intended effects of this proposal (project, policy, function, service)?							
<p>The purpose of the NFCC PPE/Clothing Committee is to bring together a National group UKFRS Representatives to work through challenges, problems statements and opportunities in relation to PPE and clothing for the benefit of all our wearers. The Committee will represent National consensus, ensuring that every consideration is made to information/feedback that is gathered on behalf of the Sector. The Committee will also be the conduit between many relevant stakeholder groups.</p> <p>In summary, the Committee will be responsible for:</p> <ul style="list-style-type: none"> • Ensuring views of all stakeholders are at the core of the delivery of all outcomes and frequent and effective engagement with the Sector is maintained, promoting the benefits and encouraging take-up of all outcomes of the Committee. • Ensure appropriate governance is in place to support the two way flow of information enabling the successful delivery of the outcomes. • Have oversight and mitigate emerging risks and issues in relation to PPE and clothing. • Monitor and evaluate the Committee's performance against its purpose. • Ensure effective and appropriate linkage to other NFCC Committees. • To horizon scan for new developments in products, ways of working and standards; evaluating their benefits/impacts 							

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- Identify research opportunities
- Delivery outcome based technical specifications specifically for all types of PPE, uniform and ceremonial wear.
- Share knowledge and subject matter expertise to grow the technical capability across the Sector
- Engage with Industry with integrity on behalf of the Sector.

Is any Equality Data available relating to the use or implementation of this proposal (policy, project, or function, service)? Please Tick (See Completion notes)

YES: Yes

NO:

We are able to utilise the Operational workforce bulletin data to provide us with existing profiles for the sector across a range of protected characteristics.

List any Consultations e.g. with employees, service users, Unions or members of the public that has taken place in the development or implementation of this proposal (project, policy, function)?

No formal consultations have taken place at present. There have been many informal conversations across a wide range of stakeholders and the committee will be the conduit for future PPE and clothing specific consultations.

Financial Analysis If applicable, state any relevant cost implications (e.g. expenses, returns or savings) as a direct result of the implementation of this policy, project, or function.

Costs (£)

Projected Returns £

Implementation £

Projected Savings £

DRAFT

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What impact will the implementation of this proposal have on people who share characteristics protected by <i>The Equality Act 2010</i> ?				
✓ (See Completion notes)				
Protected Characteristic:	Neutral Impact:	Positive Impact:	Negative Impact:	Evidence of impact and if applicable, justification if determining <i>Genuine Determining Reason</i> exists
1. Sex (Men and Women)				<p>PPE is often based on generalised anthropometric data, meaning if you are outside the 5th or 95th percentile, your hope of finding anything to fit is low. PPE and clothing should take into account the ergonomic requirements of the person who may wear it and we would anticipate that individual circumstances are taken into account before PPE is supplied. Where technically possible, the committee will seek PPE and clothing which is comfortable and suitably tailored to fit for those that identify as women including non-cisgender women, ensuring gender identity as well as biological needs are met. Considerations include:</p> <p>Recognising Women's feet aren't just smaller but are narrower, so a size "small" men's safety boot is unlikely to fit a female foot. The same is true of safety gloves. If they are not designed specifically for women the palm area will be too big and the fingers too long and wide.</p> <p>Standards written for PPE often fail to take into account female user, the outcome is that the codes PPE manufacturers must comply with often restrict the ability to make PPE that is suitable for women. Similarly, PPE designers and those who test PPE are mostly men. Though they can follow the requirements of anthropometric data, or the standards, they may fail to consider the practical implications for women. In her book <i>Invisible Women</i> Caroline Criado Perez outlines issues of a gender neutral world based on average male sizing. The committee will engage and consult with representative groups and subject matter experts and ensure the sectors needs are clearly detailed in specifications produced and will commit to consult with women at the design and testing stages.</p> <p>Market forces determine that provision of a comprehensive selection of PPE for women is often economic. If the female workforce is restricted to a single supplier, as is often the case with employer procurement contracts, it can be a challenge to find PPE that fits correctly. Most of the large suppliers in high-income countries do now provide some sizing for women but the choice is still limited. This negates the "personal" in PPE, since women are unable to find the equipment that fits them and is</p>

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				<p>comfortable. Here the internet offers a solution. Employers that allow their workforces to source their own PPE that fits well -- with guidelines on cost and requirements -- can greatly increase the engagement and compliance. Sourcing from countries with a better range, or even different industries can be both practical and cost effective.</p> <p>Good fit is an essential component of PPE effectiveness. Fit affects comfort which, in turn, affects compliance levels. No-one will be happy to wear something uncomfortable. Worse, ill-fitting equipment can increase safety risks and even cause ill health. Overalls, trousers, gloves that are too long or baggy can create tripping, entanglement, dexterity and contamination risk, as wearers roll or even tape or tie up legs or sleeves. Ill-fitting and heavy boots, breathing apparatus and body protectors can give rise to chronic musculoskeletal disorders. Poor fitting PPE can also be a source of bullying and harassment.</p> <p>There is a lack of consideration for normal biological changes. During menopause changes to facial shape can impact face fit masks. Heat stress is a known risk associated with PPE use. It can be heightened for women, not just during pregnancy but when the menstrual cycle increases core body temperature. This heat stress risk can become even more acute during the menopause. The report by Prospect et al found that 21% of women wore PPE during the menopause. Of these, 38% had curtailed their duties and 4% had changed roles as a result of problems with PPE.</p> <p>There are also monthly biological changes -- breasts can become larger and more tender during the menstrual cycle and pregnancy -- and finding a comfortable vest after a mastectomy can be impossible. Ensuring PPE fastenings are suitable for women is a consideration, again, these challenges can be heightened during the menstrual cycle, pregnancy and menopause when there is often a need to visit the toilet more frequently to change sanitary wear or from pressure on the bladder.</p>

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				<p>The committee will proactively engaging with Suppliers within the market to ascertain their thoughts and future innovations, and push person specific tailoring where possible to do so such. Recognising that information and data on women in the sector is limited.</p> <p>To support this work the committee will work with the NFCC EDI work streams.</p>
2. Race (All Racial Groups)				<p>The committee will need to consider how ethnicity, in particular the stature and body types, may impact upon the requirements of PPE wearers.</p> <p>It is in the area of respiratory protective equipment (RPE) where we are seeing actual change to cater for diversity. Because there is a critical need for respiratory products to fit the user properly, there has been a large ISO project to produce a set of respiratory standards that reflects up-to-date research Data used showed that there was a big difference in facial characteristics between Caucasian, sub-Saharan and European facial types, ensuring this drives differences in products. The committee will look to drive change specifying the requirements of the PPE.</p> <p>The committee will engage with end users through representative consultation and involvement in testing to ensure these needs are met.</p>
3. Disability (Mental, Physical, and Carers of Disabled people)				<p>Some individuals with specific disabilities may not fit into 'standard' PPE sizes and it may be that specific bespoke items are required e.g. Digit's missing from hand or the need to wear glasses. The garment will need to consider the limitations of some disabilities, for example, some users may not be able to use buttons or zips easily, or glasses wearers may require additional room in helmets/masks to accommodate lenses and hearing aids. Options may need to be available when this is the case, for example utilising Velcro or different types of fastenings as an alternative.</p>

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				<p>With an aging workforce due to increased retirement ages consideration of age related disabilities should be taken into consideration. Strength may deteriorate and therefore the weight of equipment should be a consideration.</p> <p>Specification should identify the requirements for people with disabilities.</p>
4. Religion or Belief				<p>There are some religious beliefs that require a religious headdress to be worn. For example, a hijab for a female Muslim firefighter. It is also worthy of note that leather products may be an issue for some religious beliefs.</p> <p>Ensure the specification clearly identifies the needs of these groups. Engagement with end users through representative engagement (i.e. AFSA) will be the route to ensure these needs are met</p>
5. Sexual Orientation (Heterosexual, Homosexual and Bisexual)				None identified at present
6. Pregnancy and Maternity				<p>There is a lack of consideration for normal biological changes such as pregnancy and maternity in women, for example women's feet often widen/change size during pregnancy. Specialist garments will be required particularly for workwear items of clothing.</p> <p>Ensure the specification clearly identifies the needs of this group and offers appropriate sizes. Engagement with end users through representative groups (i.e. Women in the Fire Service) will be the route to ensure these needs are met.</p>
7. Marital Status (Married and Civil Partnerships)				None identified at present

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8. Transgender				Considerations to the needs under the binary protected characteristic of Sex. Will be extended beyond the average percentiles. The committees understanding of the needs of non-cisgender individuals is limited, greater understanding is needed in particular the considerations that either affirmation therapies, medical or surgical intervention is needed. The committee will build in to PPE provisions the ability and need for bespoke equipment on the basis of an individuals preferred gender identity.
9. Age (People of all ages)				None identified at present.
Allergies				It is known that certain fabrics can cause allergic reactions to some people. For example, these allergies could include latex, neoprene or dyed fabrics. This will need to be considered when specifying the requirements of PPE and clothing. Good engagement will be undertaken with end users such as FBU, FOA and FRSA to ensure issues of these types are identified and considered.
Phobias				Koumpounophobia, a fear of buttons. This is a relatively rare, but serious phobia and one we will consider. The committee will ensure the extent of these phobias/allergies are understood and these requirements are reflected in the specification.
Veganism				Leather products are likely to be an issue for vegan groups. Ensure the specification clearly identifies the needs of this group. The committee will need to ensure there is full understanding of these requirements by engaging with the groups.

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Sustainability and circularity				The environmental impact of PPE throughout its life, from production of raw materials through manufacturing to its final disposal/recycling or reuse ensures that the impacts are mitigated. PPE suppliers/manufacturers should be asked to develop robust processes and procedures to mitigate any likely impacts.

This Equality Impact Analysis was completed by: (Name and Department):

Action Plan Owner:		Commencement date:		Sign off date:	
Action Planning:					
As a result of performing this analysis, what actions are proposed to remove or reduce any risks of adverse outcomes identified on people (employees, applicant's customers, members of the public etc.) who share characteristics protected by <i>The Equality Act 2010</i> ?					
Identified Risk:	Recommended Actions:		Responsible Lead:	Completion Date:	Review Date:
Committee to identify					

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Completion Notes:	
Analysis Ratings:	<p>The analysis rating is identified after the analysis has been completed.</p> <p>Red: As a result of performing this analysis, it is evident a risk of discrimination exists (direct, indirect, unintentional, or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i>. In this instance, it is recommended that the use of the activity or policy be suspended until further work or analysis is performed.</p> <p>If it is considered this risk of discrimination (is <i>objectively justified</i>, and/or the use of this proposal (policy, activity, function) is a <i>proportionate means of achieving a legitimate aim</i>; this should be indicated and further professional advice taken.</p> <p>Amber: As a result of performing this analysis, it is evident a risk of discrimination (as described above) exists and this risk may be removed or reduced by implementing the actions detailed within the <i>Action Planning</i> section of this document.</p> <p>Green: As a result of performing this analysis, no adverse effects on people who share Protected Characteristics are identified - no further actions are recommended at this stage.</p>
Equality Data:	<p>Equality data is internal or external information that may indicate how the activity or policy being analysed can affect different groups of people who share the nine <i>Protected Characteristics</i>. Examples of <i>Equality Data</i> include: (this list is not definitive)</p> <ol style="list-style-type: none"> 1: Application success rates by <i>Equality Groups</i> 2: Complaints by <i>Equality Groups</i> 3: Service usage and withdrawal of services by <i>Equality Groups</i> 4: Grievances or decisions upheld and dismissed by <i>Equality Groups</i>
Legal Status:	<p>This document is designed to assist organisations in “<i>Identifying and eliminating unlawful Discrimination, Harassment and Victimisation</i>” as required by <i>The Equality Act Public Sector Duty 2011</i>.</p> <p>Doing this analysis may also identify opportunities to <i>foster good relations</i> and <i>advance opportunity</i> between those who share Protected Characteristics and those that do not.</p> <p><i>An EqIA is not legally binding and should not be used as a substitute for legal or other professional advice.</i></p>
Objective And/or Proportionate	<p>Certain discrimination may be capable of being defensible if the determining reason is:</p> <ol style="list-style-type: none"> (i) <i>objectively justified</i> (ii) <i>a proportionate means of achieving a legitimate aim</i> of the organisation <p>For <i>objective justification</i>, the determining reason must be a real, objective consideration, and not in itself discriminatory. To be ‘<i>proportionate</i>’ there must be no alternative measures available that would meet the aim without too much difficulty that would avoid such a discriminatory effect. Where (i) and/or (ii) is identified it is recommended that professional (legal) advice is sought prior to completing an Equality Impact Analysis.</p>