

REQUEST FOR DEPUTY MAYOR FOR FIRE DECISION – DMFD255

Privacy for All Programme 2025-26

Executive summary:

This report requests the approval of the Deputy Mayor for Planning, Regeneration and the Fire Service to authorise the London Fire Commissioner (LFC) to commit capital expenditure of £8,914,000 for the purposes of continuing with the Privacy for All Programme.

The LFC's Privacy for All Programme commenced in 2021. The LFC now wishes to continue improving the provision of amenity facilities across the LFC's estate. It supports the LFC's Community Risk Management Plan and Workplace Dignity project within the LFC's Culture Transformation Programme. It is a key commitment, following the LFB culture review, to provide inclusive accommodation to support a diverse workforce.

The London Fire Commissioner Governance Direction 2018 sets out a requirement for the LFC to seek the prior approval of the Deputy Mayor before "[a] commitment to expenditure (capital or revenue) of £150,000 or above as identified in accordance with normal accounting practices".

Decision:

That the Deputy Mayor for Planning, Regeneration and the Fire Service authorises the London Fire Commissioner to commit capital expenditure for the purposes of the Privacy for All Programme.

Deputy Mayor for Planning, Regeneration and the Fire Service

I confirm that I do not have any disclosable pecuniary interests in the proposed decision.

The above request has my approval.

Signature:



Date:

27/01/2025

PART I – NON-CONFIDENTIAL FACTS AND ADVICE TO THE DEPUTY MAYOR

Decision required – supporting report

1. Introduction and background

- 1.1. Report LFC-24-112 to the London Fire Commissioner (LFC) explains that the 2022 HMICFRS report recommended that “the Brigade needs to make sure that staff understand the value of positive action and having a diverse workforce”. It also recommended that all fire stations provide suitable privacy and facilities for women. Previously, London Fire Brigade (LFB) implemented dedicated female facilities, delivering at least one female dormitory and one dedicated shower/toilet facility in each station, funded by the capital programme.
- 1.2. The independent culture review published in November 2022 included recommendation nine, to “ensure there are secure facilities for all women on stations”; and outcome 12 to “afford greater dignity for all staff”. The Privacy for All programme commenced in 2021 as a five-year initiative to create gender-neutral resting rooms and shower facilities across the estate, ensuring compliance with current watch strengths and promoting inclusivity.
- 1.3. Capital funding was approved for the creation of gender-neutral resting rooms and this has been deployed across LFB’s estate. Alongside this, part of the minor works budget in Property and Technical Services Support (TSS) was allocated for revenue funding for the shower rooms, to improve facilities and support inclusion and privacy for the LFC’s diverse workforce. In 2023, additional capital funding was assigned to the programme to accelerate progress.
- 1.4. The original scope of the project included 89 stations, as detailed in DMFD125 (Appendix 1 to LFC report LFC-0561). Several stations were considered out of scope, due to: completion in the original pilot project; resting accommodation already being compliant with the policy; or works being completed as part of other wider refurbishment schemes. The original scope only included fire stations.
- 1.5. Deputy Mayor for Fire and Resilience decision (DMFD) 125 authorised the LFC to commit capital expenditure and revenue expenditure for financial years 2021-22 to 2026-27, for the purposes of implementing gender-neutral design across the LFB estate. The LFC decision was set out in report LFC-0561. Further expenditure to accelerate the Privacy for All Programme was authorised in DMFD197 ([here](#)) and LFC report LFC-23-018.
- 1.6. By the end of 2024-25, 56 stations are planned for completion, in line with the acceleration programme. This represents 62 per cent of the original programme and 54 per cent of the overall estate.

2. Objectives and expected outcomes

- 2.1 A further review of the estate has been completed in combination with feedback from station users, new training requirements and current market factors. The project has evolved from the initial pilot stations, leading to updated cost estimates that accommodate unforeseen requirements. As the scope expands to support increased flexible working at stations, additional lockers and dormitory space are being incorporated, where possible, to enhance facilities for a dynamic workforce.
- 2.2 Upgrades to shower facilities are also under way, ensuring more single-use and fully enclosed facilities and promoting privacy and comfort. All stations will have male, female and gender-neutral facilities at the end of the project.
- 2.3 The principle for delivery of the project, to date, has been to ensure stations remain open. Works are therefore phased, or temporary accommodation is used, where required. This approach results in increased costs and disruption to staff, which can be challenging. This principle may also be

challenging to achieve for all sites where capacity is restricted. It is recommended that this is considered further, and alternative options are explored.

- 2.4 In collaboration with the Public Finance Initiative (PFI) contractor, LFB has recognised the complexities of retrofitting existing, naturally ventilated structures with mechanical ventilation due to the layout of the accommodation. Refined designs are being developed by the PFI contractor in consultation with the Property team. Additional legal considerations that arise through the PFI contract arrangement are being progressed.
- 2.5 Since the project began, LFB has closely adhered to the original estimate cost per room rate, despite facing significant market disruptions such as unexpectedly high inflation. The Tender Price Index indicated a nearly 10 per cent increase in tender prices over the 12 months leading to Quarter four in 2022. While this growth rate has moderated, there is still an observed annual increase of approximately 2.1 per cent in 2024. These trends reflect ongoing supply chain challenges and rising construction costs.
- 2.6 The proposed scope now also references stations where shower works are required. Appendix 1 to the LFC report LFC-24-112 provides this detail and includes all sites, to ensure the entire estate is compliant with the revised design principles. The works required include the installation of appropriate signage and rearrangement of resting or washroom facilities. It should be noted that some sites originally considered out of scope have been completed. Most of the works required at these sites were minor in nature.
- 2.7 Each LFB premise is unique therefore, costs vary significantly across sites according to the extent of works required to deliver these works within the envelope of the existing building. The scope of works includes mechanical and electrical services, ventilation, fire safety, mobilising requirements and furniture and fit-out. For some buildings there is also a requirement to relocate other functions, to ensure sufficient space is available to accommodate the new rooms, this increases costs. Planning permission, listing building consent and landlord permission are also required across multiple sites.
- 2.8 The project is being delivered in three phases. Phase one is already fully funded and subject to a previous Deputy Mayor decision, will be completed by the end of 2024-25. Phase two will be delivered in 2025-26 and is the subject of this approval request. This phase will allow another 24 fire stations to be completed. It includes three sites that were out of scope for the original programme, but which have now been costed. Phase three, the final phase of the project, will include a further 19 fire stations. This phase is anticipated to be completed by 2026-27, with a further decision paper to follow.
- 2.9 As detailed in Appendix 1 to LFC report LFC-24-112, five sites (Addington, Edmonton, Euston, Heathrow and Kentish Town) are anticipated to require significant investment and complex schemes to achieve privacy for all. These sites require further analysis to determine a solution, they are therefore unlikely to be able to be completed as part of this project.

3. Equality comments

- 3.1 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.
- 3.2 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.
- 3.3 The protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership (but only in respect of the requirements to have due regard to the need

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

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

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

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

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

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

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

- tackle prejudice
- promote understanding.

3.8 An Equality Impact Assessment (EIA) was conducted in consultation with the Inclusion Team and the LGBT+ Support Network on 21 September 2020, identifying positive impacts on women, trans staff and religious staff. The EIA found that this project will be of equal benefit to all employees, regardless of physical, sensory or mental health, learning disability, long-term illness, or hidden disability. LFB does not anticipate any impact on staff with disabilities. Consideration was given to the internal and external communications of the project, and emphasis on the positive impacts generated from the move away from large open dormitories towards individual privacy for each firefighter. This EIA remains valid and relevant for the programme and is attached at Appendix 2 to the LFC report.

3.9 This project also aligns with a separate EIA undertaken by LFB Central Operations and their review of transfers and initial firefighter placement, which highlighted the effects of reduced female and trans accommodation in acting as a barrier to achieving a more reflective workforce.

4. Other considerations

Workforce comments

4.1 Consultation on design proposals and the programme of work will continue involving all affected stakeholders. A process is in place for this and aligns to project delivery processes. This involves

reviewing initial designs with station staff and other stakeholders; and obtaining feedback, which is used to refine and finalise proposals.

- 4.2 The Station Commander at each fire station will be consulted on the potential impact of the works on operational effectiveness. Delivery and phasing of the construction works will seek to minimise the impact on station operations.
- 4.3 A representative of the Fire Brigades Union will be invited, via the Station Commander, to attend each pre-start site meeting.
- 4.4 Surveys are issued to all premises following completion of the work to gain feedback and learn lessons as the projects are delivered. This feedback is reviewed and used to inform works at further stations and to identify any snagging issues that need to be resolved.

Sustainability comments

- 4.5 The specification for the projects has been developed in accordance with the Standard Design Brief and includes consideration of sustainability principles, such as the provision of LED lighting. All waste arising from works is to be removed by a licensed waste carrier and disposed of at a permitted facility. The contractor is to supply all legally compliant signed waste transfer notes, and waste consignment notes, to the LFC.
- 4.6 No adverse environmental implications are expected to result from the implementation of this project. Consultation continues with LFB's Carbon Reduction Strategy Manager, to ensure the project does not have an adverse impact on decarbonising LFB estate.

Procurement comments

- 4.7 The works will be tendered in accordance with the LFC's Code of Practice on Tenders and Contracts, and the Public Contracts Regulations 2015 (PCR2015). Once the new Procurement Act 2023 has come into force, these works will be tendered in line with the Procurement Act 2023 instead of PCR2015.
- 4.8 The report on each tender will incorporate a recommendation to appoint the most economically advantageous tenderer to carry out these works.
- 4.9 Where possible, the Brigade tries to utilise existing frameworks for tendering works, in accordance with the Greater London Authority (GLA) collaborative procurement approach.
- 4.10 Where possible, the procurement will look to batch up sites into packages of works, to provide tendering, commercial and delivery efficiency.
- 4.11 The preferred contractor for each package of works will be selected based on their tender sum and a quality evaluation of their tender submission, to confirm that their tender submission is the most economically competitive tender and all required tender documentation has been submitted.

Conflicts of interest

- 4.12 There are no conflicts of interest to declare from those involved in the drafting or clearance of this decision.

5. Financial comments

- 5.1 This report requests approval to commit Capital Expenditure of up to £8,914,000 for 2025-26, for the purposes of the Privacy for All programme.
- 5.2 The £8,914,000 is incorporated into the draft 2025-26 capital programme, along with the associated financing of the project.

6. Legal comments

- 6.1 Under section 9 of the Policing and Crime Act 2017, the LFC is established as a corporation sole with the Mayor appointing the occupant of that office.
- 6.2 Section 1 of the Fire and Rescue Services Act 2004 (the 2004 Act) states that the LFC is the fire and rescue authority for Greater London.
- 6.3 The LFC has the power to secure the provision of personnel, services and equipment necessary to efficiently meet all normal requirements for firefighting.
- 6.4 Under section 327D of the GLA Act 1999, as amended by the Policing and Crime Act 2017, the Mayor may issue to the LFC specific or general directions as to the manner in which the holder of that office is to exercise his or her functions.
- 6.5 By direction dated 1 April 2018, the Mayor set out those matters, for which the LFC would require the prior approval of either the Mayor or the Deputy Mayor for Planning, Regeneration and the Fire Service (the Deputy Mayor). Paragraph 2.1 requires that expenditure of £150,000 or above as requested in this decision requires the prior approval of the Deputy Mayor.
- 6.6 The LFC's General Counsel will ensure that the procurement process outlined in this report complies with the LFC Scheme of Governance and the relevant Procurement Regulations in force at the time of award.
- 6.7 These comments have been adopted from those provided by the LFC's General Counsel Department in report LFC-24-12 to the LFC.

Appendices and supporting papers:

LFC report LFC-24-112 – Part 1 – Privacy for All Programme 2025-26

Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FOI Act) and will be made available on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary. **Note:** This form (Part 1) will be published either within one working day after approval or on the defer date.

Part 1 Deferral:

Is the publication of Part 1 of this approval to be deferred? NO

Part 2 Confidentiality: Only the facts or advice considered to be exempt from disclosure under the FOI Act should be in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a part 2 form? YES

ORIGINATING OFFICER DECLARATION:

Drafting officer to
confirm the
following (✓)

Drafting officer

Soeli Dayus has drafted this report with input from the LFC and in accordance with GLA procedures and confirms the following:

✓

Assistant Director/Head of Service

Niran Mothada has reviewed the documentation and is satisfied for it to be referred to the Deputy Mayor for Planning, Regeneration and the Fire Service for approval.

✓

Advice

The Finance and Legal teams have commented on this proposal.

✓

Mayoral Delivery Board

A summary of this decision was reviewed by the Mayoral Delivery Board on 20 January 2025.

✓

CHIEF FINANCE OFFICER:

I confirm that financial and legal implications have been appropriately considered in the preparation of this report.

Signature:

Fay Hammond

Date:

20/01/2025