

LONDON FIRE BRIGADE

Privacy For All Programme 2025-2026

Report to:	Date:
Investment & Finance Board	.13 November 2024 .26 November 2024
Report by:	
Claire Page, Head of Property	
Report classification:	
For decision	
For publication	
Values met	
E quity	

PART ONE

Non-confidential facts and advice to the decision-maker

Executive Summary

This report seeks approval for additional funding to continue and expand the Privacy for All programme in the financial year 2025-26. The Privacy for All programme commenced in 2021, and this report provides an update on progress to date and sets out the plan for the financial year 2025-26 to continue to improve the provision of amenity facilities across the estate. This programme forms part of the Community Risk Management Plan and the Workplace Dignity project within the Culture Transformation programme and is a key commitment following the LFB culture review to provide inclusive accommodation to support a diverse workforce.

For the London Fire Commissioner

That the London Fire Commissioner agrees that £8.914m capital funding is allocated to the Privacy for All programme for 2025-26.

1 Introduction and background

- 1.1 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" and that all fire stations provide suitable privacy and facilities for women. Previously, the 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.
- 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 the estate. Alongside this, part of the minor works budget in Property and TSS was allocated for revenue funding for the shower rooms, to improve facilities and support inclusion and privacy for 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 Appendix 1. Several stations were considered out of scope due to either 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 By the end of the financial year 2024/25, 56 stations are planned to have been completed in line with the acceleration programme. This represents 62% of the original programme and 54% of the overall estate.
- 1.6 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.
- 1.7 Upgrades to shower facilities are also underway, ensuring more are single-use and fully enclosed, which promotes privacy and comfort. All stations will have male, female and gender-neutral facilities at the end of the project.
- The principle for delivery of the project to date has been to ensure stations remain open and works are therefore phased, or temporary accommodation is utilised, 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.
- 1.9 In collaboration with the PFI contractor, the team 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 and additional legal considerations that arise through the PFI contract arrangement are being progressed.
- 1.10 Since the commencement of the project, the team 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% increase in tender prices over the 12 months leading to Q4 2022. While this growth rate has moderated, there is still an observed annual increase of approximately 2.1% in 2024. These trends reflect ongoing supply chain challenges and rising construction costs.
- 1.11 The proposed scope now also references stations where shower works are required. Appendix 1 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 re-arrangement 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 as detailed in Appendix 1.
- 1.12 Each LFB premise is unique and 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, which increases costs. Planning permission, listing building consent and landlord permission is also required across multiple sites.

1.13 The project is being delivered in three phases. Phase 1 will be completed by the end of the financial year 2024/2025. Phase 2 will be delivered in 2025/2026 and this report requests funding for this. Phase 3 will be the final phase of the project and is anticipated to be completed by 2026/2027.

2 Objectives and expected outcomes

- 2.1 The additional funding will allow the Privacy for All programme of works to complete another 24 stations. This includes 3 sites that were originally considered out of scope for the programme but have now been costed.
- 2.2 This would leave a further 19 stations to be completed in 2026/2027 to complete the project.
- As detailed in Appendix 1, there are five sites which are anticipated to require significant investment and complex schemes to achieve privacy for all. These sites (Addington, Edmonton, Euston, Heathrow and Kentish Town) require further analysis to determine a solution and therefore are unlikely to be able to be completed as part of this project. Proposals for these sites will be shared separately.

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.
- The Privacy for All programme directly supports the value of equity, ensuring facilities across the estate support a diverse workforce and provide privacy and dignity for all at work. This will enable LFC to increase the diversity within its workforce.

4 Equality Comments

- 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 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 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 to the need to:
 - tackle prejudice
 - promote understanding.
- 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 their physical, sensory, mental health, learning disability, long term illness, or hidden disability, and the 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.

4.9 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.

5 Other considerations

Workforce comments

- 5.1 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.
- 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 minimize the impact on station operations.
- 5.3 A representative of the Fire Brigades Union will be invited, via the Station Commander, to attend each pre-start site meeting.
- 5.4 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.

Sustainability comments

- 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 Commissioner.
- It is anticipated there will be no adverse environmental implications resulting from the implementation of this project and consultation continues with the LFB's Carbon Reduction Strategy Manager to ensure the project does not have an adverse impact on decarbonising the LFB estate.

Procurement comments

- The works will be tendered in accordance with the Commissioner's Code of Practice on Tenders and Contracts, and the PCR 2015 regulations. Once the new Procurement Act 2023 has come into force then these works will be tender in line with the Procurement Act 2023 instead of PCR 2015.
- 5.7 The report on each tender will incorporate a recommendation to appoint the most economically advantageous tenderer (MEAT) to carry out these works.
- Where possible, the Brigade tries to utilise existing frameworks for tendering works, in accordance with the Greater London Authority (GLA) collaborative procurement approach.

- 5.9 Where possible the procurement will look to batch up sites into packages of works to provide tendering, commercial and delivery efficiency.
- 5.10 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 (MEAT) and all required tender documentation has been submitted.

6 Financial comments

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

7 Legal Comments

- 7.1 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.
- 7.2 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.
- 7.3 The LFC has the power to secure the provision of personnel, services and equipment necessary to efficiently meet all normal requirements for firefighting.
- 7.4 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.
- 7.5 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 Report requires the prior approval of the Deputy Mayor.
- 7.6 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.

List of appendices

Appendix	Title	Open or confidential*
1	PFA Programme Overview	Open
2	EIA	Open

Part two confidentiality

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

Is there a Part Two form: YES

Appendix 1

PFA Programme Overview

Station	In /Out of Scope	Status	Notes	
Acton	In	24/25		
Addington	In	TBC	Potentially large-scale works required with extension, feasibility being completed	
Barking	In	24/25		
Barnet	In	26/27		
Battersea	In	24/25		
Beckenham	In	24/25		
Bethnal Green	In	Complete		
Bexley	In	24/25		
Biggin Hill	Out	24/25	Originally deemed as existing provision sufficient but works required to address shower provision	
Brixton	In	24/25	Grade 2 listed	
Bromley	In	Complete		
Chelsea	In	Complete		
Chingford	In	Complete		
C his wick	In	24/25		
Clapham	In	Complete		
Croydon	In	25/26		
Dagenham	In	26/27	PFI station	
Deptford	Out	24/25	Originally deemed as existing provision sufficient, signage only	
Dockhead	In	26/27	PFI station	
Dowgate	In	Complete		
E aling	In	Complete		
E ast G reenwich	In	26/27		
E ast Ham	In	Complete		
E dmonton	In	TBC	Potentially large-scale works required with extension, feasibility being completed	
E ltha m	Out	24/25	Existing provision sufficient, signage only	
E nfield	In	Complete		
E rith	In	24/25		
E us ton	In	TBC	Grade 2* listed, potentially large-scale works required	
Feltham	In	25/26		
Finchley	In	26/27		
Forest Hill	Out	24/25	Originally deemed as existing provision sufficient, small-scale shower works and signage required.	
Fulham	Out	Complete	S mall scope of works involving signage and repurposing rooms. No building works.	
G reenwich	In	26/27		
Hainault	In	24/25		

Station	In / Out of Scope	Status	Notes	
Hammersmith	In	Complete		
Harold Hill	In	Complete		
Harrow	In	Complete		
Harrow Training Centre	Out	25/26	Training centres not included in original scope	
Hayes	In	25/26		
Heathrow	In	TBC	Potentially large-scale works required, and landlord permission required	
Hendon	In	Complete	Grade 2 listed	
Heston	Out	Complete	Pilot works completed	
Hillingdon	In	24/25		
Holloway	In	Complete		
Homerton	In	25/26		
Hornchurch	In	25/26		
Hornsey	In	25/26		
Ilford	In	24/25		
Islington	In	25/26		
Kensington	In	26/27	Grade 2 listed	
Kentish Town	In	ТВС	Potentially large-scale works required	
Kingston	In	Complete		
Lambeth	Out	26/27	Potentially part of major refurbishment	
Lambeth River	Out	25/26	Was originally part of major refurbishment, scope changed, and shower works now required	
Lee Green	In	24/25	Grade 2 listed	
Lewisham	In	24/25		
Leyton	In	24/25		
Leytonstone	In	25/26	PFI station	
Mill Hill	In	Complete		
Millwall	Out	25/26	Originally deemed as existing provision sufficient but works required to accommodate lockers	
Mitcham	In	26/27	PFI station	
New Cross	In	26/27	Grade 2 listed	
New Malden	In	25/26		
Norbury	Out	26/27	Originally deemed as existing provision sufficient, showers to be reviewed	
North Kensington	In	Complete	Major scheme completed including gym moves	
Northolt	In	Complete		
Old Kent Road	In	25/26	PFI station	
Orpington	In	25/26	PFI station	
Paddington	In	24/25		
Park Royal	In	25/26		
Peckham	In	26/27		

Station	In / Out of Scope	S tatus	Notes
Plaistow	In	25/26	PFI station
Plumstead	Out	Complete	Completed as part of major refurbishment
Poplar	In	26/27	
Purley	In	26/27	PFI station
Richmond	In	Complete	
Romford	In	25/26	
Ruislip	In	24/25	
S hadwell	In	25/26	PFI station
S horeditch	In	26/27	Potentially part of major refurbishment
S idcup	In	25/26	
Soho	In	24/25	S ubject to landlord approval
S outhall	In	Complete	
Southgate	In	Complete	
S tanmore	In	Complete	
S toke Newington	In	25/26	
S tratford	In	26/27	
S urbiton	In	25/26	
Sutton	In	Complete	
Tooting	In	Complete	Grade 2 listed.
Tottenham	In	25/26	
Twickenham	In	Complete	
Wallington	Out	26/27	Originally deemed as existing provision sufficient, showers to be reviewed
Walthamstow	In	Complete	
Wandsworth	In	Complete	
Wembley	In	26/27	Grade 2 listed
Wennington	In	24/25	
West Hampstead	In	24/25	Grade 2 listed
West Norwood	In	25/26	
Whitechapel	Out	24/25	Originally deemed as existing provision sufficient. Shower works required
Willesden	In	Complete	
Wimbledon	In	26/27	
Woodford	In	25/26	
Woodside	Out	Complete	Signage only



Equality Impact Assessment (EIA) Form

The **purpose** of an EIA is to give **as much information as possible** about potential equality impacts, to demonstrate we meet our **legal duties** under the Equality Act 2010.

Please read the EIA Guidance on Hotwire before completing this form.

Once you open the template please save it on your OneDrive or SharePoint site. Do not open the template, fill it in and then click Save as this will override the template on Hotwire.

NOTE – All boxes MUST be completed before the document will be reviewed.

1.	What is the name of the policy, project, decision or activity?
Ρr	ivacy for All scope growth

Overall Equality Impact of this policy, project, decision or activity (see instructions at end of EIA to complete):

High	Medium		Low	x
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2. Administration			
Name of EIA	Paula Taylor		
author			
Have you attended	Yes □ No ⊠		
an EIA Workshop			
Department and	Access and Workplace Team Property		
Team			
Date EIA created	19/01/2023		
by author			
Date EIA signed off			
by Inclusion Team			
Date Actions			
completed			
External	Are you happy for this EIA to be	Yes	No 🗆
publication	published externally?	\boxtimes	



	If No state
	why:

3. Aim and Purpose	
What is the aim and purpose of the policy, project, decision or activity?	Decision for additional funding to accelerate the delivery of Privacy for all accommodation at fire stations.
What other policies/documents are relevant to this EIA?	Transgender people in the Workplace Policy Equalities Support Group Policy 0965 Trans Equality Model Policy

4. Equality considerations: the EIA must be based on evidence and information.			
What consultation and engagement	Please attach evidence of consultation and		
has taken place to support you to	challenge/advice given		
predict the equality impacts of this			
work?	As part of the Privacy for all wider project: Trade		
	Unions, LFB Disability Working Group and the		
Consultation must take place with	Business Disability Forum. Womens Action Group,		
ESGs (including RB ESGs),	Fire Stations, ESG group have all been consulted.		
Learning Support and affected			
groups.			



5. Assessing Equality Impacts

Use this section to record the impact this policy, project, decision or activity might have on people who have characteristics which are protected by the Equality Act.

Protected Characteristic	Impact: positive, neutral or adverse	Reason for the impact	What information have you used to come to this conclusion?
Example: Age	Adverse	Moving this service online will adversely affect older people, who are least likely to have access to a computer or smart phone and may not be able to use the new service.	GLA Datastore: X% of the London community are aged 70 or over. GLA data shows that only 10% of those over the age of 70 have regular access to a computer or smart phone.
Age (younger, older or particular age group)		Neutral. This project will be of equal benefit to all employees regardless of their age and there will be a neutral impact on this group.	Previous consultation and liaison with Inclusion team for all PFA works
Disability (physical, sensory, mental health, learning disability, long term illness, hidden)		Neutral. This project will be of equal benefit to all employees regardless of their physical, sensory, mental health, learning disability, long term illness, or hidden disability, and we do not anticipate any impact on staff with disabilities.	Previous consultation and liaison with Inclusion team for all PFA works
Gender reassignment (someone proposing to/undergoing/ undergone a transition from one gender to another)		Positive Trans staff face distinct challenges in the workplace, including access to physical spaces and gendered facilities. Although the purpose of this project is not solely to provide 'trans-inclusive' spaces, there is a significant potential positive impact on our trans and non-binary staff, and future	Previous consultation and liaison with Inclusion team for all PFA works



	recruits, who may currently be unable to access appropriate facilities.	
Marriage / Civil Partners hip (married as well as same- sex couples)	Neutral. This project will be of equal benefit to all employees regardless of their marital or civil partner status, there will be a neutral impact on this group.	Previous consultation and liaison with Inclusion team for all PFA works
Pregnancy and Maternity	Neutral. This project will be of equal benefit to all employees regardless of their pregnancy or maternity status, there will be a neutral impact on this group.	Previous consultation and liaison with Inclusion team for all PFA works
Race (including nationality, colour, national and/or ethnic origins)	Neutral. This project will be of equal benefit to all employees regardless of their nationality, colour, national and/or ethnic origins, there will be a neutral impact on this group.	Previous consultation and liaison with Inclusion team for all PFA works
Religion or Belief (people of any religion, or no religion, or people who follow a particular belief (not political)	Positive This project will be of equal benefit to all employees regardless of their religion or belief, or absence thereof. There is, however, a potential impact on people whose religion requires them to have privacy when undertaking certain personal hygiene tasks, or who require privacy in accommodation or toilet/shower facilities not shared with others	Previous consultation and liaison with Inclusion team for all PFA works
Sex (men and women)	Positive. There is a lack of representation of women in the brigade which is centred mainly in the operational staff group. The move away from a traditional layout of large open dormitories (often informally sub-divided by lockers) found in many stations, can be intimidating for some in an organisation where women represent just 8% of the operational workforce. Older fire stations are historically designed for only	Previous consultation and liaison with Inclusion team for all PFA works
	male occupants, and women have historically	



	therefore had to adapt (e.g. sleeping in a separate space, waiting for toilets/showers to be free before using as a sole woman on station), which can generate further issues and contributes to further exclusion of women within the workforce.	
	There will therefore be a positive impact on existing female staff, as well as future recruits, whose privacy will be guaranteed by individual rooms and	
Sexual Orientation (straight, bi, gay and lesbian people)	Neutral. The project will be of equal benefit to all employees regardless of their sexual orientation.	Previous consultation and liaison with Inclusion team for all PFA works

6. Impacts outside the Equality Act 2010

What other groups might be affected by this policy, project, decision or activity?

Consider the impact on: carers, parents, non-binary people, people with learning difficulties, neurodiverse people, people with dyslexia, autism, care leavers, ex-offenders, people living in areas of disadvantage, homeless people, people on low income / in poverty.

Positive – there is a significant positive impact on staff identifying as non-binary, due to the removal of unnecessarily gendered spaces and the introduction of individual privacy

7. Legal duties under the Public Sector Equality Duty (s 149 Equality Act 2010) How does this work help LFB to:				
Eliminate discrimination?	The provision of gender neutral resting/changing and toilet/shower facilities for firefighted will allow them to be used in a manner that does favour one group over another therefored ucing the likelihood of discrimination being experienced by individual firefighters.			
Advance equality of opportunity between different groups?				



	One outcome of making all resting/changing and toilet/shower facilities for firefighters gender neutral is the likelihood that there will be a wider range of accommodation available for use by underrepresented groups, enabling greater equality of opportunity in recruitment to the fire service.
Foster good relations between different groups?	The inherent flexibility of usage permitted by having gender neutral accommodation will reduce potential for conflict within individual watches over allocation of the available accommodation according to gender identity thus fostering good relations between firefighters.

8. Mitigating and justifying impacts				
Where an adverse impact has been identified, what steps are being taken to mitigate it? If you're unable to mitigate it, is it				
jus tified?				
Characteristic with potential adverse impact	Action being taken to mitigate or justify	Lead person responsible for		
(e.g. age, disability)		action		
none	n/a			

9. Follow up, actions and evaluation			
Where the Inclusion Team or other stakeholders have recommended actions in order to demonstrate due regard, these must be recorded here and delivered in accordance with time scales. Additionally, what is the organisational learning in relation to this piece of work in regards to the Equality Act 2010.			
Action recommended and person Target date Action to be completed by Date action complete responsible for delivery			
Lessons learnt and evaluation			



Free text

Now complete the RAG rating at the top of page 1:

High: as a result of this EIA there is evidence of significant adverse impact. This activity should be stopped until further work is done to mitigate the impact.

Medium: as a result of this EIA there is potential adverse impact against one or more groups. The risk of impact may be removed or reduced by implementing the actions identified in box 8 above.

Low: as a result of this EIA there are no adverse impacts predicted. No further actions are recommended at this stage.



Document Control

Signed (lead for EIA / action				Date	
plan)					
Sign off by Inclusion Team				Date	
S tored by					
Links					
External publication	Are you happy for this EIA to be published externally?	Yes 🗆	No 🗆		
			If No state	e why:	