

REQUEST FOR DEPUTY MAYOR FOR FIRE DECISION – DMFD280

Privacy for All Programme phase three

Executive summary:

London Fire Brigade (LFB) is seeking approval from the Deputy Mayor for Fire for expenditure (to the amount set out in Part 2) to complete its Privacy for All programme across its estate.

Privacy for All covers work to upgrade resting and shower facilities at 103 fire stations, to provide universal facilities that allow privacy and dignity for all staff. The improvements support LFB's commitment to equity and inclusion; and are expected to help increase workforce diversity. Approval for phase three expenditure (as set out in Part 2) will allow works at the 28 remaining sites to be completed.

Across earlier phases of the programme, LFB has refined its terminology and minimum standards for the works; consulted stakeholders; and engaged external experts to manage programme delivery and mitigate risks. LFB reports that the Privacy for All equality impact assessment from 2021 remains valid; and that it confirms the programme's positive and inclusive impact.

The London Fire Commissioner Governance Direction 2018 sets out a requirement for the London Fire Commissioner 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 (LFC) to commit capital expenditure of up to the amount set out in Part 2 for the Privacy for All programme in 2026-27.

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: 8 December 2025

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

Decision required – supporting report

1. Introduction and background

- 1.1. Report LFC-025-080 to the London Fire Commissioner (LFC) provides a detailed overview of the proposal. This is a summary of that report.
- 1.2. London Fire Brigade (LFB) started its Privacy for All programme in 2021. Its aim is to support privacy, dignity and inclusion for all, by improving resting and shower facilities across its estate.
- 1.3. In 2022, LFB was subject to external scrutiny and received recommendations that highlighted the importance of making such improvements:
 - The Independent Culture Review of LFB recommended that LFB provide secure facilities for all women on stations; and afford greater dignity for all staff.
 - His Majesty's Inspectorate of Constabulary and Fire & Rescue Services recommended that LFB take steps to support better staff understanding of the value of a diverse workforce; and that all fire stations provide suitable privacy and facilities for women.
- 1.4. LFB has received three previous approvals from the Deputy Mayor for Fire, to commit expenditure to the Privacy for All programme between 2021-22 and 2026-27. In phase one, LFB committed capital funding to create universal resting rooms (formerly called gender-neutral rooms); and used revenue funding allocated for minor works to upgrade shower facilities (see DMFD125). Subsequent approvals (DMFD197 and DMFD255) allowed LFB to accelerate the rate of investment and increase the project's scope from 89 sites to 99.
- 1.5. Privacy for All now has 103 sites in scope (listed in LFC-25-080 Appendix 1), as issues with four of the most challenging sites have been resolved and LFB has re-added them to the programme. One site, Lambeth Fire Station, will remain out of scope, as LFB expects to improve facilities there as part of its new headquarters project (8 Albert Embankment).
- 1.6. LFB reports that Privacy for All works are complete at 50 stations, with one more about to start. A further 24 stations are scheduled for delivery in 2025-26, bringing the total to 75 sites – 84 per cent of the original programme and 76 per cent of the revised scope.
- 1.7. LFB expects phase three – the final phase – to deliver improvements at the remaining 28 sites in 2026-27.

2. Objectives and expected outcomes

- 2.1. The additional funding will allow the Privacy for All programme to be concluded, and the works at the remaining premises to be delivered. On completion of this programme, LFB will have improved resting and shower facilities across its estate.
- 2.2. Privacy for All supports LFB's value of equity, ensuring facilities across the estate support a diverse workforce and provide privacy and dignity for all at work. LFB reports that that the Privacy for All programme will enable the LFC to increase diversity within LFB's workforce.

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. The public sector equality duty requires the identification and evaluation of the likely potential impacts, both positive and negative, of the decision on those with protected characteristics.

- 3.2. 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.
- 3.3. 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.
- 3.4. 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, 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.
- 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, in particular, 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, in particular, to the need to:
 - tackle prejudice
 - promote understanding.
- 3.8. LFB conducted an Equality Impact Assessment (EIA), in consultation with the Inclusion Team and the LGBT+ Support Network, on 21 September 2020. This identified 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. LFB does not anticipate any impact on staff with disabilities.
- 3.9. LFB considered the internal and external communications of the project; and emphasised the positive impacts of moving from large open dormitories towards individual privacy for each firefighter.
- 3.10. LFB reports that the EIA from 21 September 2020 remains valid and relevant for the programme. This is attached at Appendix 2.

- 3.11. This project also aligns with a separate EIA undertaken by LFB Central Operations; and with its review of transfers and initial firefighter placement. This highlighted the effects of reduced female and trans accommodation, which acts as a barrier to achieving a more representative workforce.

4. Other considerations

Ongoing risks

- 4.1. LFB reports that while the programme remains on track overall, it is aware of risks that could delay different aspects of the works, from start to finish. This would, in turn, increase costs. These risks include the following:
- The need to maintain operational availability at stations during construction may require additional phasing and temporary accommodation.
 - The schedule depends on the availability and performance of specialist contractors and supply chains. This may be affected by wider construction market pressures, resource shortages or general contractor poor performance.
 - There is a concentration of complex sites in the final phases of the programme. Many involve significant structural or services modifications. These may require planning permission, listed building consent, or third-party landlord approvals – all of which could delay mobilising the planned works.
- 4.2. LFB is taking steps to mitigate these risks through proactive management of the supply chain and early engagement with planning authorities and landlords.

PFI stations

- 4.3. Four of the 28 stations within the scope of Privacy for All phase three are subject to existing PFI contracts (see LFC-25-080 Part 2, Appendix 1). Improvements under the Privacy for All programme require existing, naturally ventilated structures to be retrofitted with mechanical ventilation. This constitutes a significant contractual variation under the PFI contract. Before work can begin at these sites, LFB needs to agree variations to the existing contract with the PFI contractor and follow associated legal processes.
- 4.4. The PFI contractor is developing refined designs at these stations in consultation with LFB Property team; and LFB is progressing additional legal considerations that arise through the PFI contract arrangement. LFB reports that, while the Property team continues to work closely with the PFI contractor to deliver the required works, this process may extend procurement and delivery timescales and increase costs at these sites.

Sustainability considerations

- 4.5. While the Sustainability Impact Assessment completed for this programme has classified it as high risk (see LFC 25-080 Privacy for All Programme Phase 3 – Part 1, Appendix 3), LFB does not anticipate any adverse environmental implications resulting from implementing Privacy for All. LFB has committed to consult its Head of Carbon Reduction throughout the programme, to ensure the project does not have an adverse impact on decarbonising the LFB estate.
- 4.6. LFB notes that the specification for the projects has been developed in accordance with the Station Design Brief; and considers sustainability principles, such as the provision of LED lighting. All waste arising from the 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.

Improvements to date and lessons learned

- 4.7. LFB-025-080 sets out improvements to Privacy for All that LFB has implemented during its first two phases, to ensure the continued success of the programme. LFB's property team has continued to review the delivery; and seek improvements, and embed lessons learnt, where applicable.
- 4.8. LFB has reviewed the minimum standards for facilities provided at each station, to ensure this is appropriate and delivers value for money. After consultation with the Fire Brigades Union and other key parties on the requirements, LFB has now agreed a refined minimum standard. LFB has also refined the terminology used to describe the facilities, to respond to the updated Building Regulations and Approved Document M. LFB now uses the term 'universal resting rooms' rather than 'gender-neutral resting rooms'.
- 4.9. LFB engaged a professional consultancy team to manage the programme. The team includes specialists such as cost consultants to manage the financial position; develop accurate pre-tender estimates; and review supplier applications for payment, and for Construction Design Management and Building Regulations support.
- 4.10. LFB has also engaged a team of building surveyors to develop the works specifications and manage the delivery of works on site. LFB reports that the building surveyors:
 - bring technical expertise and best practice to the programme
 - are investing additional time in the development of detailed specifications, to improve cost control
 - reduce the risk of resource shortages that have been seen on the programme to date
 - enable the property team to focus on other areas of work.
- 4.11. LFB has reviewed the procurement strategy; and works are now being tendered in batches using established frameworks. LFB expects that procuring the works in this way will secure efficiencies through the supply chain and make the procurements easier to manage. LFB also considers that the frameworks will provide opportunities for new suppliers to be introduced to the LFB estate.

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, up to the amount set out in Part 2, for the final year of the Privacy for All programme (2026-27).
- 5.2. The amount set out in Part 2 is incorporated into the draft 2026-27 capital programme along with the associated financing of the project.

6. Legal comments

- 6.1. The LFC's General Counsel's Department have confirmed the following.
- 6.2. 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.

- 6.3. Section 1 of the Fire and Rescue Services Act 2004 states that the LFC is the fire and rescue authority for Greater London.
- 6.4. The LFC has the power to secure the provision of personnel, services and equipment necessary to efficiently meet all normal requirements for firefighting.
- 6.5. 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.
- 6.6. 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 of the London Fire Commissioner Governance Direction 2018 requires that expenditure of £150,000 or above as requested in this Report requires the prior approval of the Deputy Mayor.
- 6.7. 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 the award.

Appendices and supporting papers:

LFC-025-080 – Privacy for All Programme Phase 3 – Part 1 and its appendices

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

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

✓

Assistant Director/Head of Service

Chandru Dissanayeke 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.

✓

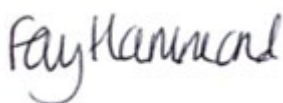
Mayoral Delivery Board:

A summary of this decision was reviewed by the Mayoral Delivery Board on 8 December 2025.

✓

CHIEF FINANCE OFFICER:

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



Signature:

Date: 8 December 2025