



LONDON FIRE BRIGADE

LFC-25-080

Privacy For All Programme - Phase 3

Report to:**Date:**

| | |
|---------------------------------|-----------------|
| Investment & Finance Board..... | 2 October 2025 |
| Commissioner’s Board | 15 October 2025 |
| Deputy Mayor’s Fire Board..... | 5 November 2025 |
| London Fire Commissioner | |

Report by: Sony Bal - Head of Access & Workplace

Authorising Head of Service: Claire Page - Head of Property

Report classification:

For decision

For publication/Not for publication: Not for publication

Values met

Equity

PART ONE

Non-confidential facts and advice to the decision-maker

Executive Summary

This report seeks approval for additional funding to continue and complete the Privacy for All programme in the financial year 2026-27. 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 2026-27 to bring the Privacy for All programme to a close. This programme forms part of the Community Risk Management Plan and the Workplace Dignity project which was originally part of the Culture Transformation programme and is a key commitment following the London Fire Brigade (LFB) culture review to provide inclusive accommodation to support a diverse workforce.

For the London Fire Commissioner

The London Fire Commissioner agrees the amount set out in Part 2 is allocated to the Privacy for All programme for 2026-27.

1 Introduction and background

- 1.1 The 2022 His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (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.
- 1.2 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. 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."
- 1.3 Capital funding was approved for the creation of universal resting rooms (formerly called gender-neutral resting rooms) and these have been deployed across the estate. Alongside this, part of the minor works budget in Property and Technical Support Services (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 Shower facility upgrades, initially funded through the minor works revenue budget in Property and TSS, are now part of the capital programme.
- 1.5 The project was originally scoped to cover 89 fire stations. Some stations were excluded because they had already been completed under the pilot project, their resting accommodation was already compliant with policy, or the works had been addressed through wider refurbishment schemes. Initially, the scope applied only to fire stations. However, following LFC-24-112, the scope was expanded to 99 sites, with additional funding secured to support the broader programme for delivery in 2025/26.
- 1.6 To date, 50 stations have been completed with one further station commencing imminently. By the end of 2025/26 a further 24 stations are planned to be delivered which will bring this total to 75. This represents 84% of the original programme and 76% of the overall programme (99 sites in line with LFC-24-112).
- 1.7 Appendix 1 details the status of the overall programme and the premises planned for the final phase. It should be noted that Lambeth has now been removed from the programme as the provision of improved facilities will be delivered as part of the new HQ project. There were five sites that were previously identified as challenging to complete due to specific site constraints and potential larger scale investment being required. The designs for these sites have now been developed further, and those sites are now proposed to be included back within the programme. The overall scope is therefore now amended to 103 premises, an increase of four from those included as part of LFC-24-112.
- 1.8 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. This continues to be considered for each site, and alternative options will be explored where it is viable.
- 1.9 In collaboration with the Private Finance Initiative (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. These works will constitute a significant contractual variation under the PFI contract, and this may impact the delivery timescales for these sites. The Property team continues to work closely with the PFI contractor to deliver the required works.
- 1.10 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.
- 1.11 The programme is being delivered in three phases:
- Phase one consisted of 56 premises which were due to be completed by the end of 2024/25. 50 of these stations have now been completed and one further station is commencing imminently. The remaining five stations have not yet been completed due to specific site constraints such as achieving landlord consent and specific challenges relating to site capacity and constraints. Work has continued to progress the proposals for these stations, and it is now proposed for those to be

completed as part of Phase three of the programme.

- Phase two consists of 24 premises which will be delivered in 2025/2026 and is in progress.
- Phase three will be the final phase of the project and is scheduled to be completed by the end of 2026/2027. This phase will now consist of 28 sites.

1.12 The Property team has continued to review the delivery of this programme and seek improvements and embed lessons learnt where applicable. The following improvements have been implemented to ensure the continued success of the programme:

- The programme management is being led by a professional consultancy team. This team includes provision of specialist support such as cost consultants to manage the financial position, develop accurate pre-tender estimates and review supplier applications for payment and Construction Design Management (CDM) and Building Regulations support.
- Alongside the consultancy team, a team of outsourced building surveyors has also been engaged to develop the works specifications and manage the delivery of works on site. This approach reduces the risk of resource shortages which have been seen on the programme to date and enables the property team to focus on other areas of work. The building surveyors bring technical expertise and best practice to the programme and are investing additional time in the development of detailed specifications to improve cost control.
- The procurement strategy has been reviewed, and works are now being tendered in batches using established frameworks. Procuring the works in this way will secure efficiencies through the supply chain and enable improved management. The frameworks will also provide opportunities for new suppliers to be introduced to the LFB estate.
- The minimum standards for facilities provided at each station have been reviewed to ensure this is appropriate and delivers value for money. Consultation took place with the Fire Brigade's Union and other key parties on the requirements, and a refined minimum standard has now been agreed. The terminology for facilities has also been refined to respond to the updated Building Regulations and Approved Document M and the terminology of gender neutral has been replaced with universal.

1.13 While the programme remains on track overall, there are a number of risks that could affect the delivery of the works planned. These include:

- The concentration of complex sites in the final phases of the programme, many of which involve significant structural or services modifications and may require planning permission, listed building consent, or third-party landlord approvals, all of which could delay mobilising the planned works.
- Dependence on the availability and performance of specialist contractors and supply chains, which may be affected by wider construction market pressures, resource shortages or general contractor poor performance.
- The need to maintain operational availability at stations during construction, which may require additional phasing and temporary accommodation.
- Sites delivered through the PFI contract, where agreement on variations and associated legal processes could extend procurement and delivery timescales and increase costs.

Mitigation measures, including early engagement with planning authorities and landlords, close liaison with the PFI contractor, and proactive supply chain management, will be maintained to minimise these

risks.

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 the estate to support privacy, dignity and inclusion.

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.
- 3.2 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 its diversity within its workforce.

4 Equality Comments

- 4.1 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.
- 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, 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.

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, in particular, 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, in particular, to the need to:

- tackle prejudice
- promote understanding.

4.8 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 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.

4.9 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.

4.10 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 Consultations on design proposals and the programme of work will continue involving all affected stakeholders. A process is in place for this and aligns to the 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.
- 5.2 The Station Commander at each fire station will continue to 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.
- 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 future works at further stations.

Sustainability comments

- 5.5 The specification for the projects has been developed in accordance with the Station Design Brief and includes consideration of 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 Commissioner.
- 5.6 It is anticipated there will be no adverse environmental implications resulting from the implementation of this project and consultation continues with the LFB's Head of Carbon Reduction to ensure the project does not have an adverse impact on decarbonising the LFB estate.
- 5.7 The SDIA checklist and full SDIA has been completed, and the project has been classified as high risk.

Procurement comments

- 5.8 The works will be tendered in accordance with the Commissioner's Scheme of Governance standing orders relating to procurement and the UKs procurement regulations.
- 5.9 The procurement strategy for these works will be developed by the Assets and Estates Procurement team in conjunction with the Head of Access and Workplace.
- 5.10 The procurement strategy will explore all appropriate collaboration options and Public Buying Organisations (PBO) frameworks to identify the most appropriate route to market. In accordance with the Greater London Authority (GLA) collaborative procurement approach.
- 5.11 The preferred procurement approach is to batch up sites into packages of works to provide tendering, commercial and delivery efficiency. The exact structure will be explored as part of the procurement strategy and will be reviewed throughout the delivery of the works.
- 5.12 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 appropriate to the projects needs and all required tender documentation has been submitted in accordance with the LFC Scheme of Governance and the procurement regulations.
- 5.13 The procurement award report for each tender will recommend the Most Economically Advantageous Tenderer (MEAT) to carry out these works. The procurement award report for each tender will recommend the MEAT to carry out these works.
- 5.14 The project will continuously review the procurement routes and tender structure to reflect continuous improvement practices and delivery of value for money.

Communications comments

- 5.15 Communications on the programme will continue to be delivered including local communication on specific site plans and wider communications across the organisation to communicate the programme achievements and milestones.

6 Financial comments

- 6.1 This report requests approval to commit Capital Expenditure of up to the amount set out in Part 2 for the final year of the Privacy for All programme, for 2026/2027.
- 6.2 The amount set out in Part 2 is incorporated into the draft 2026/27 capital programme along with the associated financing of the project.

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 comply with the LFC Scheme of Governance and the relevant Procurement Regulations in force at the time of the award.

List of appendices

| Appendix | Title | Open or confidential* |
|----------|--|-----------------------|
| 1 | PFA Programme Overview | Open |
| 2 | EIA | Open |
| 3 | Sustainable Dev Impact Asst Checklist PFA 2024 | Open |
| | Full SDIA | 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 | Latest Status | Completed Date |
|---------------|---------------------|---------------|----------------|
| Acton | In | 26/27 | |
| Addington | In | 26/27 | |
| Barking | In | Complete | Oct-24 |
| Barnet | In | 26/27 | |
| Battersea | In | Complete | Jul-25 |
| Beckenham | In | Complete | Jan-25 |
| Bethnal Green | In | Complete | Apr-23 |
| Bexley | In | Complete | Jan-25 |
| Biggin Hill | In (Previously out) | 26/27 | |
| Brixton | In | 26/27 | |
| Bromley | In | Complete | Nov-21 |
| Chelsea | In | Complete | Dec-23 |
| Chingford | In | Complete | Oct-24 |
| Chiswick | In | Complete | Apr-25 |
| Clapham | In | Complete | Nov-23 |
| Croydon | In | 25/26 | |
| Dagenham | In | 26/27 | |
| Deptford | In (Previously out) | Complete | Dec-24 |

| Station | In / Out of Scope | Latest Status | Completed Date |
|------------------------|---------------------|---------------|----------------|
| Dockhead | In | 26/27 | |
| Dowgate | In | Complete | Dec-23 |
| Ealing | In | Complete | May-23 |
| East Greenwich | In | 26/27 | |
| East Ham | In | Complete | Apr-24 |
| Edmonton | In | 26/27 | |
| Eltham | In (Previously out) | Complete | Dec-24 |
| Enfield | In | Complete | Sep-24 |
| Erith | In | 26/27 | |
| Euston | In | 26/27 | |
| Feltham | In | 25/26 | |
| Finchley | In | 26/27 | |
| Forest Hill | In (Previously out) | Complete | Jan-25 |
| Fulham | In (Previously out) | Complete | Jul-24 |
| Greenwich | In | 26/27 | |
| Hainault | In | Complete | Apr-25 |
| Hammersmith | In | Complete | Nov-24 |
| Harold Hill | In | Complete | Aug-23 |
| Harrow | In | Complete | Sep-23 |
| Harrow Training Centre | In (Previously out) | 25/26 | |
| Hayes | In | 25/26 | |
| Heathrow | In | 26/27 | |
| Hendon | In | Complete | Jun-24 |
| Heston | In (Previously out) | Complete | Jun-21 |
| Hillingdon | In | Complete | Mar-25 |
| Holloway | In | Complete | Feb-22 |
| Homerton | In | 25/26 | |
| Hornchurch | In | 25/26 | |
| Hornsey | In | 25/26 | |
| Ilford | In | Complete | Jun-25 |
| Islington | In | 25/26 | |
| Kensington | In | 26/27 | |
| Kentish Town | In | 26/27 | |
| Kingston | In | Complete | Feb-24 |
| Lambeth | Out | N/A | N/A |
| Lambeth River | In (Previously out) | 25/26 | |
| Lee Green | In | Complete | Dec-24 |
| Lewisham | In | Complete | Mar-25 |
| Leyton | In | Complete | Apr-25 |

| Station | In / Out of Scope | Latest Status | Completed Date |
|------------------|---------------------|---------------|----------------|
| Leytonstone | In | 25/26 | |
| Mill Hill | In | Complete | May-24 |
| Millwall | In (Previously out) | 25/26 | |
| Mitcham | In | 26/27 | |
| New Cross | In | 26/27 | |
| New Malden | In | 25/26 | |
| Norbury | In (Previously out) | 26/27 | |
| North Kensington | In | Complete | Feb-23 |
| Northolt | In | Complete | Apr-22 |
| Old Kent Road | In | 25/26 | |
| Orpington | In | 25/26 | |
| Paddington | In | Complete | Jul-25 |
| Park Royal | In | 25/26 | |
| Peckham | In | 26/27 | |
| Plaistow | In | 25/26 | |
| Plumstead | In (Previously out) | Complete | Oct-24 |
| Poplar | In | 26/27 | |
| Purley | In | 26/27 | |
| Richmond | In | Complete | Feb-24 |
| Romford | In | 25/26 | |
| Ruislip | In | Complete | Apr-25 |
| Shadwell | In | 25/26 | |
| Shoreditch | In | 26/27 | |
| Sidcup | In | 25/26 | |
| Soho | In | 26/27 | |
| Southall | In | Complete | Jun-23 |
| Southgate | In | Complete | Aug-22 |
| Stanmore | In | Complete | Sep-22 |
| Stoke Newington | In | 25/26 | |
| Stratford | In | 26/27 | |
| Surbiton | In | 25/26 | |
| Sutton | In | Complete | Mar-23 |
| Tooting | In | Complete | Nov-22 |
| Tottenham | In | 25/26 | |
| Twickenham | In | Complete | Feb-24 |
| Wallington | In (Previously out) | 26/27 | |
| Walthamstow | In | Complete | Jun-24 |
| Wandsworth | In | Complete | Apr-23 |
| Wembley | In | 26/27 | |
| Wennington | In | Complete | Nov-24 |

| Station | In / Out of Scope | Latest Status | Completed Date |
|----------------|--------------------------|----------------------|-----------------------|
| West Hampstead | In | 24/25 | |
| West Norwood | In | 25/26 | |
| Whitechapel | In (Previously out) | Complete | Mar-25 |
| Willesden | In | Complete | Dec-22 |
| Wimbledon | In | 26/27 | |
| Woodford | In | 25/26 | |
| Woodside | In (Previously out) | Complete | Dec-23 |



LONDON FIRE BRIGADE

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? |
| Privacy 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 |
|------|--|--------|--|-----|---|

| | | | |
|---------------------------------------|---|---|-----------------------------|
| 2. Administration | | | |
| Name of EIA author | Paula Taylor | | |
| Have you attended an EIA Workshop | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | | |
| Department and Team | Access and Workplace Team Property | | |
| Date EIA created by author | 19/01/2023 | | |
| Date EIA signed off by Inclusion Team | | | |
| Date Actions completed | | | |
| External publication | Are you happy for this EIA to be published externally? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |



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|--|--|--|------------------|
| | | | 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.

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

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? |
|--|--------------------------------------|---|--|
| <i>Example: Age</i> | <i>Adverse</i> | <i>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.</i> | <i>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.</i> |
| 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 and non-binary employees can face specific challenges in the workplace, particularly in relation to access to physical spaces and gendered facilities. This project has a significant potential positive impact on this staff group. | Previous consultation and liaison with Inclusion team for all PFA works |

| | | | |
|---|--|---|--|
| <p>Marriage / Civil Partnership (married as well as same-sex couples)</p> | | <p>Neutral. <i>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.</i></p> | <p>Previous consultation and liaison with Inclusion team for all PFA works</p> |
| <p>Pregnancy and Maternity</p> | | <p>Neutral. <i>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.</i></p> | <p>Previous consultation and liaison with Inclusion team for all PFA works</p> |
| <p>Race (including nationality, colour, national and/or ethnic origins)</p> | | <p>Neutral. <i>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.</i></p> | <p>Previous consultation and liaison with Inclusion team for all PFA works</p> |
| <p>Religion or Belief (people of any religion, or no religion, or people who follow a particular belief (not political))</p> | | <p>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</p> | <p>Previous consultation and liaison with Inclusion team for all PFA works</p> |
| <p>Sex (men and women)</p> | | <p>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.</p> <p>Older fire stations are historically designed for only 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.</p> | <p>Previous consultation and liaison with Inclusion team for all PFA works</p> |

| | | | |
|--|--|--|---|
| | | 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. <i>The project will be of equal benefit to all employees regardless of their sexual orientation.</i> | Previous consultation and liaison with Inclusion team for all PFA works |

| |
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| 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 (s149 Equality Act 2010) | |
| How does this work help LFB to: | |
| Eliminate discrimination? | The provision of gender neutral resting/changing and toilet/shower facilities for firefighters will allow them to be used in a manner that does not favour one group over another therefore reducing 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. |

| | |
|---|---|
| <p>Foster good relations between different groups?</p> | <p><i>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.</i></p> |
|---|---|

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

| <p>9. Follow up, actions and evaluation</p> | | |
|--|---|-------------------------------------|
| <p>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.</p> | | |
| <p>Action recommended and person responsible for delivery</p> | <p>Target date Action to be completed by</p> | <p>Date action completed</p> |
| | | |
| | | |
| <p>Lessons learnt and evaluation</p> | | |
| <p>Free text</p> | | |

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



LONDON FIRE BRIGADE

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 plan) | | Date | |
| Sign off by Inclusion Team | | Date | |
| Stored by | | | |
| Links | | | |
| External publication | Are you happy for this EIA to be published externally? | Yes <input type="checkbox"/> | No <input type="checkbox"/> If No state why: |

Sustainable Development Impact Assessment Checklist

Project Name/ Policy Name & No: Privacy for All Project

Contact Person: Claire Page

Date completed: 14/10/24

Please send through the completed checklist with a copy of the project PID or the draft policy to environment@london-fire.gov.uk. For existing policies undergoing minor amendments, please send through a marked up copy of the policy, with the original SDIA.

| Other impact assessments completed | | | | Yes | No |
|--|-------------------------------------|------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| 1. Has an Equalities Impact Assessment been completed? | | | | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 2. Has a Health, Safety and Wellbeing assessment been completed? | | | | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Environmental Impacts | | | | | |
| 3. Will this consume any of the following (please tick those that apply and state how and if this would increase or decrease our consumption): | | | | | |
| Gas | <input checked="" type="checkbox"/> | Electricity | <input checked="" type="checkbox"/> | Water | <input checked="" type="checkbox"/> |
| Petrol or diesel | <input checked="" type="checkbox"/> | Hazardous chemicals | <input checked="" type="checkbox"/> | Other natural resources e.g. timber | <input checked="" type="checkbox"/> |
| Comments: The project includes provision of gender-neutral resting rooms and associated facilities across the estate. This includes construction and fit out works to existing premises impacting mechanical, electrical and fire services. All works will be delivered in accordance with the standard station design brief and relevant policies to ensure sustainability is considered. | | | | | |
| 4. Will this produce or reduce our production of (please tick those that apply and describe what and how): | | | | | |
| Non-hazardous waste | <input type="checkbox"/> | Hazardous waste (see PN 862) | <input type="checkbox"/> | pollutants to air, land or water? | <input type="checkbox"/> |
| Comments: The works are not anticipated to impact these elements | | | | | |
| 5. Will this impact (positively or negatively): | | | | Yes | No |
| a. Operational/business travel by staff | | | | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Travel/deliveries by our suppliers | | | | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Environmental protection at incidents | | | | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. a Site of Special Scientific Interest | | | | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

| | | |
|---|-------------------------------------|-------------------------------------|
| e. Gardens or other wildlife at stations/brigade sites (e.g. nesting birds or bats) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Comments: It is unlikely that any of these will be affected by this project | | |
| Procurement | Yes | No |
| 6. Will this result in the purchase of goods, services or works or influence how they are procured? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| f. Is this for a purchase of greater than £1m? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| g. Will this use/result in a tender for manufactured goods such as electronics, textiles, and building materials? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| h. Will this service require low skilled/low paid employees? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| i. Will the goods consume utilities or consumables? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| j. Does this involve major works taking place? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| k. If so are BREEAM and Ecological surveys required? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| l. Will this support future cost avoidance? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| m. Could all or part of the purchase be provided by small or local businesses? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| n. Could this be delivered by a voluntary/community sector organisation? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| o. Has a Request For Tender been submitted to Procurement through hotwire? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Comments: The project involves minor refurbishment works to existing stations to improve amenity facilities. All works will be procured with support of the LFB Procurement team. Low skilled employees may be utilised as part of the construction process but it is unlikely due to the type of works being undertaken. | | |

For the SD Team to complete:

Policy sustainability risk rating: High

Inputs/outputs/ impacts to address in Full SDIA: A full SDIA is required because it is a large purchase and involves the consumption of utilities and the use of low skilled employees.

Date completed: 22/9/25 EW

Full SDIA Template

To be completed by the Sustainable Development Team

| | |
|---|--|
| Name or Title of Policy/Project and Reference Number (if available): | |
| <i>Privacy for All Programme</i> | |
| Purpose of Policy/Project: | |
| <i>The purpose of the Privacy for All programme is to create an agreed number of minimum universal resting rooms and shower/washroom facilities across the estate (the latter in addition to gender specific facilities), ensuring compliance with current watch strengths and promoting inclusivity.</i> | |
| What are the potentially negative impacts or benefits against the 6 areas of LFB’s sustainability framework? | Have any opportunities for improvement or reducing negative impacts been identified? |
| Equalities and Social Inclusion | Positive impact – creation of universal facilities in line with; the 2022 His Majesty’s Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) report, the independent culture review published in November 2022, updated Building Regulations and Approved Document M. |
| Climate Change | Minimal impact. This includes construction and fit out works to existing premises impacting mechanical, electrical and fire services, rather than increasing the footprint of the buildings. |
| Environment & Its Resources | Negative impact – limited resources consumed during construction, transport and limited on waste as the majority of works are taking place within the existing dorm areas and retro fitting will also be undertaken. |
| Community Safety | No impact |
| Health, Safety & Wellbeing | Positive impact- creation of universal facilities, in addition to gender specific washroom facilities. |
| Economic Sustainability | Negative impact - significant investment required. Minimal impact - where possible sustainable products/materials will be used. Low skilled employees may be utilised as part of the construction process, but it is unlikely due to the type of works being undertaken. |
| What evidence or information has helped to indicate what the potential impacts will be? Did you seek any further advice or guidance from any internal or external sources, and if so how have they contributed? | |
| <i>The benefits of the works are compliant with 2022 His Majesty’s Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) report, the independent culture review published in November 2022, updated Building Regulations, Approved Document M. All works will be delivered in accordance with the standard station design brief and relevant policies to ensure sustainability is considered.</i> | |
| How will any changes be implemented? | |
| <i>Works will continue to take place in 2025/2026 to 24 sites, with works to the remaining 28 sites taking place in 2026/2027.</i> | |
| Is a Procurement to take place as part of the policy/project? | |
| Yes. Sites will be batched and procured used existing frameworks. | |
| Contact | <i>Paul Farmery</i> |

| | |
|--|---|
| Date Approved* | <i>For policies only</i> |
| Sustainable Development Team Comments | |
| Legal Compliance | |
| EMS Aspects | 23/9/25 signed off by Ellie Wright |
| General Comments | |

| |
|---|
| Review |
| Is a review of this SDIA required? No If yes, detail: <i>e.g. policy review date or start of project delivery phase to confirm environmental legal compliance requirements</i> |

| | |
|----------------------------|--------------------------|
| Board Sign off date | <i>For projects only</i> |
| Review date | <i>For projects only</i> |