# GREATER LONDON AUTHORITY

## **REQUEST FOR DEPUTY MAYOR FOR FIRE & RESILIENCE DECISION – DMFD100**

Title: LFB OneRisk Solution - Agreement to Funding

#### **Executive Summary:**

This report recommends that the Deputy Mayor for Fire and Resilience gives approval for the London Fire Commissioner (LFC) to commit capital expenditure of up to £2.201 million for the London Fire Brigade (LFB) to undertake development and rollout of the 'LFB OneRisk' solution.

It is proposed to replace LFB's different systems that collect and manage building risk information, with a solution that provides an integrated view of building fire-related risk. This was agreed in principle by the LFC in June 2019 (LFC-0212).

This report seeks agreement to the funding for the design, development and implementation of a new system, known as LFB OneRisk. The solution will replace the existing fire safety systems (Farynor, Home Fire Safety Visit database), Operational Risk Database (ORD) and other smaller systems. The LFB OneRisk solution will incorporate recommendations from the Grenfell Tower Inquiry Phase 1 report regarding building owners being required to provide the LFB with building information. The delivery of LFB OneRisk forms part of the LFB's Grenfell Tower Inquiry action plan.

The London Fire Commissioner Governance Direction 2018 sets out a requirement for the LFC to seek prior consent before '[a] commitment to expenditure (capital or revenue) of £150,000 or above'. The Direction also provides the Deputy Mayor with the authority to 'give or waive any approval or consent required by [the] Direction'.

#### **Decision:**

The Deputy Mayor for Fire and Resilience authorises the London Fire Commissioner to commit capital expenditure of up to £2.201 million for the development and rollout of the LFB OneRisk solution.

## **Deputy Mayor for Fire and Resilience**

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

The above request has my approval.

Signature: Date:

22 February 2021

## PART I - NON-CONFIDENTIAL FACTS AND ADVICE TO THE MAYOR

### Decision required - supporting report

## 1. Introduction and background

- 1.1. Report LFC-0461 explains that in July 2019, the London Fire Commissioner (LFC) agreed a proposition (LFC-0212) to replace the London Fire Brigade's (LFB's) different systems that collect and manage building risk information and to create a new solution providing an integrated view of building risk the LFB OneRisk solution.
- 1.2. The LFB OneRisk solution will incorporate recommendations from the Grenfell Tower Inquiry Phase 1 report regarding building owners being required to provide the LFB with building information. The project has the aim of providing a solution to better manage and present risk information within the LFB. Risk includes:
  - risk to persons;
  - risk to buildings; and
  - risk to firefighters.
- 1.3 The project will also enable the LFB to meet a recommendation from Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) 2019 inspection to "ensure all its firefighters have good access to relevant and up-to-date risk information". And, will assist the Brigade in achieving recommendation 7 from the Grenfell Tower Inquiry's phase 1 report, which was aimed at all fire and rescue services, to support (by accessing external data sources) making electronic plans of buildings available to incident commanders and control room managers.

Peer review of the project

- 1.4 A peer review of the project was carried out by the Director for Transformation, at the request of the LFC. The primary purpose of the review was to confirm that the project's potential to succeed had been considered in the wider context of the organisation's transformation agenda, to review the outcomes and objectives for the project (and the way they fit together) and to confirm that they would make the necessary contribution to the overall strategy of the organisation. This review was carried out between 3 to 8 December 2020 and was undertaken as a desktop research exercise.
- 1.5 This review found that successful delivery of the project appears feasible at this early stage of project development. There are several areas where improvements can be made that will increase the likelihood of a successful outcome. These areas are resolvable and, if addressed promptly, should not present a cost/schedule overrun.

Systems

- 1.6 Over the last twenty years the LFB has developed in-house systems to manage risk information where previously information was either paper-based, or not collected at all. Those systems have been through many iterations and are quite sophisticated. Although linked together in many ways, the level of integration can be improved and the data standards used, harmonized. These systems are in the scope of the LFB OneRisk project for re-working or replacement. They include:
  - Fire Safety System (Farynor);
  - Home Fire Safety Visits database (HFSV);
  - Operational Risk Database (ORD); and
  - Electronic Premises Information Plate (e-PIP).

- 1.7 A key requirement of any process to collect and hold building risk information, is to ensure that:
  - (a) quality data is input and held, and
  - (b) data held is updated and kept current.
- 1.8 Both the Farynor system, in respect of building fire safety audits, and LFB Diary, for managing 'section 7(2)(d)' visits/re-visits under the Fire and Rescue Services Act 2004 by station crews, ensure that information maintains currency. Both the Farynor system and LFB Diary have processes that make sure that buildings are re-visited, at frequencies determined according to the 'risk' allocated to a building.
- 1.9 During the last 10 years the LFB has also developed a mobile capability and there are now numerous mobile applications available on mobile devices, usually on Windows tablets. These apps include:
  - Fire Safety Inspection App;
  - Water Office Hydrant App;
  - Appliance Workload App;
  - Premises Risk Assessment App (PRA); and
  - Persons at Risk App (PAR).
- 1.10 Each of the main systems listed above has its own dedicated database and the new LFB OneRisk solution will have an integrated database supporting various functional modules. This will facilitate the elimination of data duplication and allows the LFB to impose uniform data standards across all modules.

Location management and mapping

- 1.11 The LFB has developed expertise in the management of location data. The LFB has long used the Geographers' A-Z Mapping of London, and later started to use the Postal Address File (PAF) to validate addresses. The LFB were early adopters of the National Land and Property Gazetteer (NLPG), which is now managed by Ordnance Survey and called AddressBase Premium. This system provides unique property reference numbers (UPRNs) nationally and supports a hierarchical approach to building data so that, for example, individual flats in a block can be linked together.
- 1.12 Part of the project is to enhance the LFB's use of gazetteer data and to ensure that all location data is correctly referenced and searchable. In scope is a review of our gazetteer system to ensure that we have the most advanced capability around the use of location data.
- 1.13 The ability to add data to maps is also central to the new solution. The LFB already has access to all public sources of UK digital mapping and has built a robust capability around its use. The LFB has had expertise in processing map data and in matching external datasets to the gazetteer information so that they can be referenced in our systems and mapped where required. For example, the LFB simplify some aspects of the Ordnance Survey digital maps (OS MasterMap) to remove extraneous information and reprocess the map tiles for mobile use at different scales.
- 1.14 Mapping is used extensively in the LFB's existing systems, but within the LFB OneRisk the ability to map data will be enhanced and ubiquitous. To prepare for this, the supporting systems are already being upgraded (including GeoServer and OpenLayers).

External data

1.15 Where possible the LFB need to rely on external data sources that helps the LFB understand the different risks in the built environment, and risks facing people. Where the LFB can identify external data that is maintained regularly and updated, then the LFB should seek to exploit this and bring such data into the LFB OneRisk solution, to provide a richer picture of a building's risk profile. External

data might also help identify buildings which are not known about yet. For example, the LFB has been interested in obtaining data about the location of electricity sub-stations within buildings, and data on how buildings are used from the Valuation Office Agency. Part of the project would be to see what external data sets the LFB can use.

1.16 With regard to external datasets, the LFB also receives monthly NHS data on oxygen cylinders used by patients at home. This is supplied by two different NHS contractors. The LFB matches the data against the gazetteer and import it into its operational systems. A similar exercise is underway with the Ministry of Housing, Communities & Local Government high-rise dataset.

Alternative options considered and consultation

- 1.17 An alternative option for the LFB would be to continue with the existing systems. Although it would be possible to bring together data from these systems to provide a single holistic view of building risk, this would largely be achieved through reporting, rather than holding the data together. It would not be possible to prevent data duplication and redundancy in different systems, nor to ensure consistency with what data each system holds about a building. In addition, some of the key systems that would be replaced are nearing end of their life as software and would need to be replaced in any event to take advantage of more modern technologies.
- 1.18 The procurement route to deliver the LFB OneRisk solution has not been finally decided, and it may be possible to deliver what the LFB needs via an 'off-the-shelf" solution(s), rather than commit to a bespoke development (or a combination of these). However, it is not be possible to finally determine this until the requirements are signed off, which is now expected to happen at in February 2021, when the procurement phase shall get underway (see project timelines at paragraph 2.4).

## 2. Objectives and expected outcomes

- 2.1 These drivers for change have created the opportunity to look again at the LFB's existing systems, and to develop this proposition for the LFB OneRisk solution. This is likely to comprise a single database holding the data, with different systems or tasked-based 'apps' which staff will use to input and access data they need.
- 2.2 At minimum, the LFB OneRisk solution would hold data related to:

Risk to firefighters (Operational risk)

- crew section 7(2)(d) visits;
- Electronic Premises Information Plate (ePIP);
- PRA outcomes;
- residential high-rise visits (effectively targeted section 7(2)(d) visit); and
- contingency plans.

Risk to persons (Community safety)

- home fire safety visits;
- safe and well visits; and
- PAR data.

Risk to buildings/persons (Regulatory fire safety)

• audits/inspections;

- enforcement actions;
- consultations, including building control;
- petroleum licensing;
- · fire engineering;
- sub-surface railways; and
- visits by crews.
- 2.3 This is an ambitious project that aims to deliver an enhanced and more uniform user experience in different contexts. It will promote higher quality data about risks, and better presentation of that data. It will support operational incidents, regulatory fire safety and community safety activity, planning and reporting. It should also simplify the training requirement for new users by promoting a common look and feel across many modules. It will also support the LFB's inclusion agenda by using the best design standards and accessibility tools.

Project approach and future timelines

2.4 Following the approval to the principle of the LFB OneRisk solution by the LFC in June 2019, work to develop functional requirements for the solution has been underway. These requirements have now been documented and presented to the stakeholders for review and signoff) but not yet actually signed off. This is expected to complete in February. The overall high level timelines for delivery of the solution can be summarised as follows:

Phase	Project stage	Estimated completion date
Phase 1	Business Requirements Gathering & Systems Analysis	February 2021
Phase 2	Procurement	end June 2021
Phase 3	Architecture, design, development	end December 2022
Phase 4	Implementation and familiarisation	phased to March 2023

- 2.5 Appropriate project governance arrangements will be put in place to steer the project. Phase 1 of the project has two aspects:
  - stakeholder workshops focused on specific business activities; and
  - a review of existing systems.
- 2.6 In order to model business requirements and document this information, the LFB has adopted a software modelling tool, SPARX<sup>1</sup> and hired consultants to assist with the stakeholder workshops.
- 2.7 At every stage of the project the LFB is (or will be) referencing external factors including recommendations from the Grenfell Tower Inquiry, and government. As further recommendations are published, design documents will be reviewed to ensure conformity with recommendations and best practice.
- 2.8 The development approach (phase 3) will include several aspects:
  - extensive use of prototyping;
  - re-use of common dialogues and routines;

<sup>&</sup>lt;sup>1</sup> SPARX is an enterprise wide solution to visualise, analyse, model, test and maintain systems, software, processes and architectures for complex projects.

- use of common data standards;
- all system communications to be via defined web services;
- integration with other systems, e.g. Finance, Microsoft 365;
- a simplified mobile solution (via the web where possible);
- adherence to accessible design principles;
- support for text to voice and voice to text; and
- modular development and phased delivery.
- 2.9 The use of prototyping will allow stakeholders to see what they are getting in terms of 'look and feel' and functionality and should ensure high levels of usability. Prototyping includes the use of mock-ups before any code is written for the user interface.
- 2.10 The LFB wants to build a system that is easy to use. It may be that there will be different ways to do the same thing with different points of access to the LFB OneRisk database. For example, many staff will be familiar with using 'apps' on their smartphone to do specific tasks. A series of small task focussed 'apps' may be an appropriate approach for the ways in which staff will interact with the LFB OneRisk solution. Traditionally, this might have included separate 'apps' for things like a section 7(2)(d) visit, a fire safety audit, or a home fire safety visit. But, a visit 'app' focussed on those different staff who may visit buildings might support a more joined-up approach. These 'apps' might support what fire crews are expected to do during visits (combining section 7(2)(d) visits, visual audits, fire safety), with a different 'app' for, say, a fire safety inspecting officer. Whilst 'apps' may be the direction to go in, more work with users will determine an appropriate approach. It may be determined that there are different ways to do the same thing, with access from a traditional system like LFB Diary being just as appropriate as using an app.
- 2.11 However users interact with the LFB OneRisk solution, the intention is that the data will be held in a single database ensuring that it can be easily joined-up for users whether as part of the apps that support the task to be carried out, or as part of outputs from the system, in terms of business intelligence products like dashboards, or tabular reports.

Funding for the new system

2.12 The funding for the LFB OneRisk solution has been identified and is derived from several previously identified sources, as set out in the table below, and is based on costs identified for upgrade replacement of existing systems being diverted to the LFB OneRisk solution. It is proposed to combine these separate lines in the capital plan into a single 'LFB OneRisk solution' line.

	2021/22	2022/23	Total
Home Fire Safety Database (linked to Farynor Project)	70,000	60,000	130,000
Farynor Replacement (linked to ICT Home Fire Safety Database Project)	521,000	200,000	721,000
Operational Risk Database (One Risk)	550,000	800,000	1,350,000
			2,201,000

A national solution

2.13 Several fire and rescue services brigades have already used the LFB's Farynor system (a bespoke fire safety solution developed for the LFB) and have expressed interest in this new project. The LFB OneRisk solution will be designed in such a way as to allow fire and rescue services other than LFB to use it. In effect, this means having support for the different regional 'cuts' of the national gazetteer and having published interfaces to allow integration with other external systems not in use at the LFB

– for example, integration with different finance systems. Working with other services in this way may provide collaborative opportunities in terms of the scope and functionality of the solution. As with the Farynor system, the LFB would benefit financially from use of the LFB OneRisk solution by another service. This is because LFB retains the intellectual property rights (IPR) on Farynor. There is a marketing agreement that supports this and provides for an IPR royalty fee that reduces the annual support fees LFB pays.

## 3. Equality comments

- 3.1 The LFC and decision takers are required to have due regard to the Public Sector Equality Duty (s149 of the Equality Act 2010) when taking decisions. This in broad terms involves understanding the potential impact of policy and decisions on different people, taking this into account and then evidencing how decisions were reached.
- 3.2 It is important to note that consideration of the Public Sector Equality Duty is not a one-off task. The duty must be fulfilled before taking a decision, at the time of taking a decision, and after the decision has been taken.
- 3.3 The protected characteristics are: Age, Disability, Gender reassignment, Pregnancy and maternity, Marriage and civil partnership (but only in respect of the requirements to have due regard to the need to eliminate discrimination), Race (ethnic or national origins, colour or nationality), Religion or belief (including lack of belief), Sex, Sexual orientation.
- 3.4 The Public Sector Equality Duty requires us, in the exercise of all our functions (i.e. everything we do), to have due regard to the need to:
  - a) eliminate discrimination, harassment and victimisation and other prohibited conduct;
  - b) advance equality of opportunity between people who share a relevant protected characteristic and persons who do not share it; and
  - c) 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 <u>advance equality of opportunity</u> 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:
  - a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic where those disadvantages are connected to that characteristic;
  - b) 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; and
  - c) 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 <u>foster good relations</u> 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 (a) tackle prejudice, and (b) promote understanding.
- 3.8 An Equality Impact Assessment (EIA) was undertaken on 11 November 2020. The EIA found that overall, the new solution would promote inclusion because accessibility tools would be enabled throughout the system. This benefit would also be enhanced by the more widespread use of personal

computers and tablets/laptops (instead of Citrix) where accessibility tools such as dictation, voice control and speech recognition will be able to run locally.

#### 4 Other considerations

#### Procurement

- 4.1 The first phase of the project was to develop detailed requirements for the LFB OneRisk solution. This work commenced in April 2020 and was completed by December 2020, has been presented to stakeholders and we are awaiting final sign off. Funding of up to £100,000 (capital) for development of the detailed requirements was agreed under delegated authority arrangements in the former London Fire and Emergency Planning Authority in August 2016 to complete this work.
- 4.2 With the functional requirements available, the procurement (phase 2) will determine whether there is any software on the market that might deliver some or all of what the LFB needs, or whether bespoke solution would need to be developed. Any new procurement activity will need to be undertaken in line with the Public Contracts Regulations 2015 and GLA group Responsible Procurement policy which will include requirements for skills and employment, and support for the Mayor's Good Work Standards.
- 4.3 Research on potential routes to market is at very early stages and will be developed further when the specification has been agreed by the project board, in January 2021. This is likely to include market engagement to determine whether there are any 'off-the-shelf' solutions available or whether a bespoke Fire & Rescue Service development will be needed. The procurement will also comply with all current procurement legislation requirements and LFC standing orders in force at the time, and collaboration opportunities will be fully explored.

## Strategic drivers

- 4.4 There are several drivers for change to existing systems and work underway which has driven the development of the proposition for the LFB OneRisk solution described in this report. These drivers include:
  - work to continue to enhance the way the LFB collects and manages building risk information;
  - to learn lessons from the Grenfell Tower fire and address the Grenfell Tower Inquiry's phase 1 recommendations;
  - an updated PRA process and the supporting collection of building operational risk information for the ORD was included in an updated Policy 800 in July 2020;
  - work to develop a replacement or the (life expired) Farynor fire safety system with something that reflects modern ways of working;
  - an overhaul of our risk-based fire safety audit programme;
  - development of proposals to reintroduce fire safety inspections by fire station crews; and
  - the introduction of tablet devices across the LFB, including on appliances, has changed the landscape for data collection allowing LFB to embrace mobile working more effectively.
- 4.5 The delivery of the LFB OneRisk solution is reflected in the Transformation Delivery Plan as follows:

Pillar	Strategy	Action
Delivering excellence	Understand and communicate risk information to better deliver our services	Deliver a solution for managing all buildings risk information.

4.6 The delivery of LFB OneRisk solution is also reflected in the Grenfell Tower Inquiry action plan as follows:

"Delivery of the LFB OneRisk Solution, which will incorporate work for the LFB as a result of all recommendations associated with building owners being required to provide the LFB with building information. This includes recommendations 4a, 6a, 6b, 7a, 7b, 12c and the additional note in section 6 (Plans) of the Inquiry Phase 1 report."

#### 5 Financial comments

- 5.1 This report recommends that £2,201,000 of capital expenditure is committed for the development and roll out of the LFB OneRisk solution. The initial report had set out an initial budget estimate for the solution of £2,700,000 covering a period from April 2019 to March 2024, this had been revised to a budget of £2,201,000 covering the period from April 2020 to March 2023. The funding at £2,201,000 is included in the draft Capital Strategy and amalgamates funding previously identified for the upgrade/replacement of exiting systems into the now proposed LFB OneRisk solution.
- 5.2 Ongoing revenue costs for LFB OneRisk will be incurred from 2023/24 and will be met from existing Information Technology (IT) budgets as spend is repurposed from the existing systems which the LFB OneRisk solution will replace. These budgets are set out overleaf:

System	Current annual support (£)
Farynor	128,000
Home Fire Safety Visit (HFSV)*	15,000
Operational Risk Database (ORD)*	20,000
Electronic Premises Information Plate (ePIP)*	3,000
Total	166,000

<sup>\*</sup> These are elements of a larger contract for multiple systems support

5.3 The 2020/21 Capital Strategy (LFC-0324) includes LFB OneRisk solution under the Information and Communication Technology (ICT) section of the Strategy, and this provides funding at £2.201m to fund the OneRisk although this is still currently referred to under the old project descriptions as broken down below:

	2021/22	2022/23	Total
Home Fire Safety Database (linked to Farynor Project)	70,000	60,000	130,000
Farynor Replacement (linked to ICT Home Fire Safety Database Project)	521,000	200,000	721,000
Operational Risk Database (One Risk)	550,000	800,000	1,350,000
			2,201,000

5.4 If the project is financed from external borrowing, the annual debt charges would be £286,130, based on a 10-year asset life – this includes annual debt repayment at £220,100 and annual interest charge of £66,030, based on an interest rate of three per cent. However it should be noted that the asset life has yet to be confirmed and 10 years is an estimate, and the LFB OneRisk solution would replace elements of systems that have asset lives ranging from five to 15 years, and this could impact significantly on the annual debt charges. If the asset life was five-years, the annual debt charges could rise to £506,230. As the project develops the LFB will consider recharge options to other Fire and

Rescue Services for the use of the system. This could potentially reduce the ongoing maintenance costs incurred.

## 6 Legal comments

- 6.1 This report seeks to approval of funding for a new ICT system 'LFB OneRisk Solution'.
- 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 ('the 2004 Act') states the LFC is the fire and rescue authority for Greater London.
- 6.4 Under section 327D of the GLA Act 1999, as amended by the Policing and Crime Act 2017, the Mayor may issue to the LFC specific or general directions as to the manner in which the holder of that office is to exercise his or her functions.
- 6.5 By direction dated 1 April 2018, the Mayor set out those matters, for which the LFC would require the prior approval of either the Mayor or the Deputy Mayor for Fire and Resilience (the "Deputy Mayor"). In particular, paragraph (b) of Part 2 of the said direction requires the LFC to seek the prior approval of the Deputy Mayor before "[a] commitment to expenditure (capital or revenue) of £150,000 or above as identified in accordance with normal accounting practices...". The decision to procure a new ICT system as set out in the recommendation of this report far exceeds this value, therefore, this report to the Deputy Mayor fulfils the aforementioned requirement in the direction.
- 6.6 Report LFC-0461 confirms that the LFB's Procurement Department will be engaged in the Project Team and in the tender process from start to end to ensure compliance with the requirements set out in the Public Contracts Regulations 2015, the GLA responsible procurement policy, and LFC standing orders. The Project Team will also ensure the specification and end product is compliant with other requirements including but not limited to the data protection laws.
- 6.7 Section 5A of the 2004 Act enables the LFC to "do anything it considers appropriate for the purposes of the carrying out of its functions".
- 6.8 The LFC is also a 'best value' authority under the Local Government Act 1999 and must make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness.
- 6.9 The development and procurement of one ICT system 'LFB OneRisk Solution' and related outputs fall within the duties and powers of the LFC. It will assist all staff and workers to be more efficient and effective in their day to day work, seek to address some of the recommendations from Phase 1 of the Grenfell Tower inquiry, and generally ensure best practice in terms of data management.

# Appendices and supporting papers:

Appendix 1: LFC-0461 – LFB OneRisk Solution – Agreement to Funding

#### **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 either be published within one working day after approval <u>or</u> on the defer date.

## Part 1 Deferral:

## Is the publication of Part 1 of this approval to be deferred? YES

If YES, for what reason:

The commercial interests of the London Fire Commissioner require deferral of the decision until after the cooling off period for the contract award has expired.

Until what date: 01 April 2021

**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 - NO

ORIGINATING OFFICER DECLARATION:	Drafting officer to confirm the following (✓)
Drafting officer	3
Richard Berry has drafted this report with input from the LFC and in accordance with GLA procedures and confirms the following:	✓
Assistant Director/Head of Service  Niran Mothada has reviewed the documentation and is satisfied for it to be referred to the Deputy Mayor for Fire and Resilience for approval.	✓
Advice	
The Finance and Legal teams have commented on this proposal.	✓
Corporate Investment Board This decision was agreed by the Corporate Investment Board on 8 February 2021.	

## **EXECUTIVE DIRECTOR, RESOURCES:**

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

Signature Date

D. Gene

22 February 2021