



LONDON FIRE BRIGADE

LFC –25-021x

Portable Hygiene Unit - PHU

Report to:

Investment & Finance Board
Commissioner's Board
Deputy Mayor's Fire Board
London Fire Commissioner

Date:

23 January 2025
12 February 2025
25 February 2025

Report by: Deputy Assistant Commissioner (DAC) Central Operations

Report classification:

For decision

For publication

Values met

Service
Equity

I agree the recommended decision below.

Andy Roe

London Fire Commissioner

Date

**This decision was remotely
signed on 25 March 2025**

PART ONE

Non-confidential facts and advice to the decision-maker

Executive Summary

This report recommends that the Deputy Mayor for Planning, Regeneration, and the Fire Service ("Deputy Mayor") authorise the London Fire Commissioner ("LFC") to allocate up to the amount set out in Part Two of this report for a five-year contract (2025–2030) contract for the maintenance and transportation of Personal Hygiene Units (PHUs) for operational crews at protracted incidents.

These units provide essential welfare facilities, including toilets, handwashing, changing areas, and sanitary product access, particularly benefiting female staff and supporting the London Fire Brigade's (LFB)" compliance with the Equality Act 2010.

Recommended Decisions

For the London Fire Commissioner

That the London Fire Commissioner agrees that the expenditure set out in Part Two of this report be allocated from F14061MM54 for the purpose of procuring a new contract to transport and maintain the LFB's PHUs.

That the LFC authorises the Assistant Director, Procurement and Commercial to procure, negotiate and enter into a contract for the maintenance and transportation of LFB's PHUs.

1 Introduction and background

- 1.1 LFB owns two Portable Hygiene Units (PHU); these are trailer mounted welfare facilities which provide:
 - Male and Female toilets
 - Ablutions (sinks for hand washing which provide hot and cold running water, soap, and hand drying facilities)
 - Access to women's sanitary products (both dispensing and disposal facilities).
 - A small changing area
- 1.2 In addition to the obvious benefits PHUs provide to all staff at protracted incidents, they are also a key enabler for LFB in meeting its obligations set out in the Equality Act 2010 in the context of operational incidents, as they serve to:
 - Minimise disadvantages suffered by and meet the needs of female staff at protracted incidents in respect of access to women's sanitary products and facilities.

- Advance equality of opportunity between people who share a relevant protected characteristic and persons who do not share it.
 - Signal LFB's commitment to recognising and supporting the needs of underrepresented groups.
- 1.3** The current 12-month extension to LFB's contract with the previous maintenance and transport service provider will expire in April 2025. It is therefore proposed that LFB procure a long-term (five year) maintenance and transportation solution with a suitable supplier, via the open tender process.
- 1.4** The new contract will maintain the current requirement that PHUs are delivered within three hours of mobilisation across London, enhancing operational efficiency and supporting a more inclusive workforce. Sustainability requirements, including ULEZ compliance, will also be incorporated into the supplier agreement.

2 Objectives and expected outcomes

- 2.1** The new contract will secure the provision of PHUs for the use of operational staff in attendance at protracted incidents until April 2030.
- 2.2** The PHU's will be delivered to incident grounds in accordance with the specified contract within set times scales (3 hours or less) anywhere in London as per mobilisation requirements from control.
- 2.3** The LFC is committed to providing suitable welfare and toilet facilities at operational incidents, ensuring a more dignified and inclusive environment for all personnel.

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 ongoing provision of PHUs at protracted incidents is firmly in keeping with the LFB's values, in particular:

Service in that they enable our staff to perform their duties for extended periods of time at protracted incidents, unhindered by a lack of access to hygiene facilities.

Equity in that PHUs minimise disadvantages suffered by and meet the needs of female staff at protracted incidents in respect of access to women's sanitary products and facilities.

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** As these PHU's are already owned by the London Fire Brigade and are in operational use, No EIA was carried out for the original procurement of these units or for the contract that was awarded, the Central ops team have now submitted an EIA for review, and this will be available once finalised, a draft is included in appendix 1 for information.

Other considerations

Workforce comments

- 4.9** Due to the timescales for delivery at operational incidents (3 hours or less), it was deemed necessary to update the welfare at incidents policy which would enable Station Commanders to bring operational staff back to stations for 'welfare reasons' should the need be more urgent than the required three-hour delivery timescales.

Sustainability comments

- 4.10** As per the current contract, the supplier would be required to meet the Mayor's ULEZ compliancy requirements for their delivery vehicles.

Procurement comments

- 4.11** The procurement team has been working closely with the customer team to finalise key documents in readiness to approach the market. The procurement is due to be published with the 'Invitation to Tender.'
- 4.12** This Procurement is being run under the Open procedure, which is a formal bidding procedure, under which the Agreement is advertised, and all interested organisations/consortium ("Tenderers") can bid.
- 4.13** The procurement exercise is seeking to award a 5-year contract with a value as set out in Part Two of the report.
- 4.14** The LFC intends to award the contract on the basis of the tender that represents the most economically advantageous tender. Tenders will be evaluated in accordance with the evaluation methodology outlined below:

Criteria	Weighting
Price	30%
Quality	60%
Social Value	10%
Total	100%

- 4.15** Bidders are also required to complete and submit the selection questionnaire (SQ) by the tender submission deadline. SQ submissions will be evaluated prior to the evaluation of the tender response documents.

Communications comments

- 4.16** This paper is for a new contract for the delivery and maintenance of the Brigade's PHU's. The contract is a mirror image of our current provision and requirements that are already in place and therefore this is for information purposes only.
- Prevention, Protection and Policy – Head of Stakeholder Engagement.
 - Preparedness and Response – Head of External Communications.
 - Enabling services (including Corporate Services, Transformation) – Head of Internal Communications.

5 Financial comments

- 5.1** Detailed financial comments are set out in Part Two of this report.
- 5.2** A full cost appraisal will be done upon agreement of this report. This expenditure will be closely monitored, and any savings identified will be considered as part of future budget processes.

6 Legal Comments

- 6.1** Under section 9 of the Policing and Crime Act 2017, the London Fire Commissioner (the "Commissioner") is established as a corporation sole with the Mayor appointing the occupant of that office. Under section 327D of the GLA Act 1999, as amended by the Policing and Crime Act 2017, the Mayor may issue to the Commissioner specific or general directions as to the manner in which the holder of that office is to exercise his or her functions.
- 6.2** By direction dated 1 April 2018, the Mayor set out those matters, for which the Commissioner would require the prior approval of either the Mayor or the Deputy Mayor for Planning, Regeneration, and the Fire Service (the "Deputy Mayor").
- 6.3** Paragraph (b) of Part 2 of the said direction requires the 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...".
- 6.4** The Deputy Mayor's approval is accordingly required for the London Fire Commissioner to commit revenue expenditure of up to the amount set out in Part Two of this report, for the period 2025 to 2030, to procure a new contract for the maintenance and transportation of LFB's Personal Hygiene Units (PHU) to and from protracted operational incidents, for use by LFB crews where alternative arrangements are not available.
- 6.5** The statutory basis for the actions proposed in this report is provided by section 7 (2)(a) of the Fire and Rescue Services Act 2004, under which the Commissioner must secure the provision of personnel, services, and equipment necessary to efficiently meet all normal requirements for firefighting.
- 6.6** Furthermore, under section 20 (1) of the Workplace (Health, Safety and Welfare) Regulations 1992 the Commissioner, being an employer, is required to provide suitable and sufficient sanitary conveniences at readily accessible places.
- 6.7** The General Counsel also notes that the proposed procurement of the goods and service provider is in compliance with the applicable public procurement legislation and in accordance with the LFC's scheme of governance.

List of appendices

Appendix	Title	Open or confidential*
1	EIA	

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

Full Equality Impact Assessment (EIA) Form

When completing this form please use the [EIA guidance notes](#) and check our other resources on our dedicated [EIA Hotwire pages](#)

Part one

You will only be required to complete a full EIA assessment if:

- a) as a result of completing the initial screening form, potential adverse impacts have been identified in an area of your activity requiring adjustments
- b) you are starting, reviewing or changing any major activity (e.g. a strategy, programme or campaign)

The purpose of an EIA is to meet and justify the legal obligation required under the [Public Sector Equality Duty](#) (PSED), namely, the 'DUE REGARD' that documents that your activity will:

- a) eliminate discrimination, harassment, and victimisation;
- b) advance equality of opportunity; and,
- c) foster good relations between people who share a relevant protected characteristic and people who do not share it.

In your full EIA, you are only required to complete an assessment of any negative impacts. You must be able to show that your activity meets the three conditions of the due regard by providing relevant information to show how it caters for people with protected characteristics (where applicable), through eliminating potential discrimination and promoting opportunities to build equity between all groups.

A. Title, status, and expected outcomes of the activity

Title: Procurement of Maintenance and Transportation Services for Portable Hygiene Units (PHUs)

Status: Proposal for a five-year contract (2025–2030)

Expected Outcomes:

- Ensure the availability of PHUs at protracted incidents to provide essential welfare facilities for operational staff.
- Support LFB's compliance with the Equality Act 2010 by addressing the specific needs of female staff, particularly regarding access to sanitary products and facilities.

Full Equality Impact Assessment (EIA) Form

- Enhance operational efficiency by maintaining a three-hour delivery requirement for PHUs across London.

B. Who is this activity for, who is impacted by it? (all LFB staff, specific department, external communities)

This activity is designed for all operational LFB staff who may attend protracted incidents.

It particularly impacts female staff by providing necessary sanitary facilities, thereby promoting inclusivity and equality within the workforce, and aligning with LFB's commitment to fostering a diverse and supportive working environment.

C. Reason for Equality Impact Assessment

Review of existing activity due to the expiration of the current maintenance and transport service provider's contract in April 2025 and the proposal to procure a long-term solution.

D. Team responsible for the activity

EIA Author(s):

Name: Joseph Haynes
Job title: Station Officer
Department: Central Operations

EIA Owner(s) - individual in charge of the overall activity:

Name: Jamie Jenkins
Job title: Deputy Assistant Commissioner
Department: Central Operations

E. What other policies/documents are relevant to this EIA? (Please hyperlink each document, policy, and guideline referenced below)

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F. Equality and diversity considerations

Describe the ways how your activity meets the conditions of the due regard of the PSED and how LFB employees and communities of London may be affected by your activity, especially those ones with protected characteristics. Explain whether your activity may disproportionately affect any groups with a protected characteristic listed under the Equality Act 2010.

You must make sure to list any sources you have used to complete your analysis.

Do not provide databases, graphs, or tables in this section. Just key findings and the outcomes of your learning about these different groups.

The procurement and deployment of PHUs directly support LFB's obligations under the Public Sector Equality Duty (PSED) by:

Eliminating discrimination: Providing separate male and female toilets, ablution facilities, and access to women's sanitary products ensures that female staff are not disadvantaged during protracted incidents.

Advancing equality of opportunity: By addressing the specific hygiene needs of female staff, PHUs promote a more inclusive environment, encouraging the recruitment and retention of women in operational roles.

Fostering good relations: The provision of equitable facilities demonstrates LFB's commitment to supporting all staff, thereby enhancing morale and cohesion within diverse teams.

No disproportionate negative impacts on any protected characteristic groups have been identified. The initiative is designed to promote equality and inclusivity across the workforce.

Sources used:

Equality Act 2010

LFB Inclusion Strategy

Fire Standards Board's Core Code of Ethics

G. Evidencing Impact: please answer the following:

G1. (a) List all stakeholders and organisations (internal/external) you have consulted or contacted regarding your

LFB's Inclusion Team

Operational staff representatives

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activity, making sure to seek feedback from groups that may be the most impacted by the activity.	Technical Service Support Health and Safety
(b) Explain the insights gained, how you have/will evaluate and whether you intend to conduct a follow-up or seek post-activity feedback from those stakeholders/organisations?	Consultations revealed that female operational staff highly value the availability of sanitary products and private changing areas during protracted incidents. The Health and Safety department emphasized the importance of timely PHU deployment to maintain operational efficiency and staff well-being. Feedback will be continuously sought to assess the effectiveness of PHU provisions and to identify any areas for improvement.
<p>G2. Clearly record any gaps in evidence which has limited this assessment being completed in full.</p> <p>I.e. Was there any information or data you were unable to find/collect?</p> <p>Consider whether you can justify continuing the activity without this information, or if a mitigating action plan is required?</p>	<p>No significant gaps in evidence have been identified. Ongoing monitoring and feedback mechanisms will ensure that any emerging issues are promptly addressed.</p>
<p>G3. Clearly record the following:</p> <p>a) List any adjustments you will be putting in place for people with protected characteristics. Use each characteristic as a sub-heading, and</p>	<p>Gender reassignment: For trans and non-binary employees, the presence of separate male and female toilets in PHUs may not adequately cater to their needs, creating discomfort, distress, or a feeling of exclusion. Issues may include:</p>

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<p>b) any activity to promote equity of access, opportunity, experience and outcomes?</p>	<ul style="list-style-type: none"> • Lack of a gender-neutral option: Some trans and non-binary staff may feel anxious or unsafe using gendered facilities, leading to avoidance of PHU usage at protracted incidents. • Potential for discrimination or harassment: Even if no explicit discrimination occurs, the fear of judgement or misgendering in high-pressure operational environments may deter trans staff from accessing PHU facilities. • Privacy concerns: If the PHU changing areas are insufficiently private, staff undergoing gender transition may feel uncomfortable using shared or communal changing spaces. <p>Elimination/Justification</p> <p>Proposed Mitigation:</p> <ul style="list-style-type: none"> • Introduce a gender-neutral toilet option: The existing 'male' and 'female' signage could be replaced with universal access signage (e.g., 'Toilet' rather than gender-specific labels). • Enhance privacy features in changing areas, including floor-to-ceiling cubicles to ensure dignity for all staff. • Provide explicit guidance and policy assurance to reinforce that PHUs must be inclusive and welcoming for trans and non-binary employees. • Training for all staff on inclusive facility use, helping to foster an understanding, respectful, and non-judgmental operational culture. • As this current contract extension is for units already in service and likely to be replaced in the next contract cycle, we will ensure that provisions for this protected characteristic are fully integrated into the next specification. <p>Justification (if not fully mitigated):</p> <ul style="list-style-type: none"> • Given the operational nature of firefighting and the limited space available within PHUs, fully separate gender-neutral units may not be feasible at this time. However, by reframing the signage and enhancing privacy, the PHUs could be adapted to be inclusive while still operationally practical.
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	<p>Disability: While PHUs provide essential welfare facilities, their design and accessibility features may unintentionally disadvantage staff with disabilities, particularly those with:</p> <ul style="list-style-type: none"> • Mobility impairments: If PHUs are not wheelchair-accessible, disabled staff may be unable to use the toilets, sinks, or changing areas. • Sensory sensitivities (Neurodivergence): Bright lighting, noise levels, and confined spaces inside PHUs could cause discomfort or distress for neurodivergent staff. • Chronic conditions: Employees requiring urgent toilet access (e.g., Crohn's disease, colostomy bags, diabetes-related needs) may struggle if PHUs are difficult to enter or if additional facilities (e.g., seating, waste disposal) are not available. <p>Elimination/Justification</p> <p>Proposed Mitigation:</p> <ul style="list-style-type: none"> • Ensure future PHU procurement includes accessibility features such as wider doorways, ramps, grab rails, and wheelchair-accessible cubicles. • Introduce priority access procedures and associated signage to ensure staff with chronic conditions are not left waiting in urgent situations. • Install adjustable lighting or provide quiet spaces within future PHUs where feasible to support neurodivergent individuals. • Provide additional seating inside future PHUs for individuals who may need to sit while changing or using hygiene facilities. • As this current contract extension is for units already in service and likely to be replaced in the next contract cycle, we will ensure that provisions for this protected characteristic are fully integrated into the next specification. <p>Justification (if not fully mitigated):</p> <ul style="list-style-type: none"> • Current PHUs were not originally designed with full accessibility in mind, as they were procured for the exclusive use of operational LFB staff and there are
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	<p>limitations to the extent to which operational staff may be disabled (e.g. no LFB operational staff will require wheelchair facilities). However, going forward, design and procurement of future units could prioritise accessibility compliance to cater for members of partner agencies and the public, and if modifications to the current units are not structurally possible, alternative solutions (e.g. SCs returning staff to stations for welfare needs in extreme cases) will be considered as a last resort.</p> <p>LFB remains committed to eliminating barriers faced by trans, non-binary, and, to the extent that they exist, disabled operational staff.</p> <p>To ensure continuous improvement, the following actions could be taken:</p> <p>Immediate:</p> <ul style="list-style-type: none"> • Consider modifying PHU signage to ensure gender-neutral access and privacy. • Develop inclusive operational guidance for all staff on PHU accessibility and respectful facility use. <p>Within 12 months:</p> <ul style="list-style-type: none"> • Engage with LFB's accessibility SMEs and the persons responsible for PHUs to assess whether the existing units can be retrofitted with accessibility enhancements. <p>Long-term:</p> <ul style="list-style-type: none"> • Ensure any new PHUs procured post-2025 fully comply with desired accessibility standards. • Review and upgrade all operational welfare facilities to ensure full inclusion for all staff, in line with the Equality Act 2010 and best practice. • This EIA ensures that LFB's commitment to inclusivity is embedded into operational welfare provisions, and that no staff member is left behind due to their gender identity or disability.
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	<p>Potential Negative Impact of Making the Current Portable Hygiene Units (PHUs) Gender Neutral on Female Staff</p> <p>While the intent behind making PHUs gender-neutral is to enhance inclusivity for trans and non-binary staff, it is critical to consider how this change may negatively impact female operational staff, particularly in the following areas:</p> <ul style="list-style-type: none"> • Privacy and Comfort Concerns: Many female firefighters already face challenges in predominantly male-dominated environments, particularly regarding privacy and dignity when using welfare facilities at protracted incidents. • If PHUs are made fully gender-neutral, some female staff may feel uncomfortable sharing limited, enclosed spaces (toilets, sinks, and changing areas) with male colleagues. • The cultural or religious beliefs of some female staff may prevent them from using mixed-gender facilities, leading them to avoid using PHUs altogether. • Undressing in shared spaces can be particularly challenging for female firefighters, who may feel pressured to change quickly to avoid discomfort in a mixed-gender setting. <p>Potential consequence:</p> <ul style="list-style-type: none"> • Female firefighters may delay or avoid using the PHUs altogether, leading to physical discomfort, hygiene concerns, and an unequal experience compared to male colleagues who are less likely to experience similar reservations. <p>Proposed mitigation:</p> <ul style="list-style-type: none"> • Retain separate, designated private areas within PHUs (i.e. ensure at least one cubicle is clearly marked as a women's-only space, whilst making the male space gender neutral). • Introduce floor-to-ceiling partitions in changing areas to ensure all staff feel secure and respected. <p>Increased risk of facility overuse and queuing delays:</p>
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	<ul style="list-style-type: none"> • If PHUs become fully gender-neutral, the existing limited facilities (one male and one female toilet) may no longer be equally split. • Given that male firefighters outnumber female firefighters in the LFB, it is possible that men may predominantly occupy the PHUs, making it harder for women to access them. • Women often require additional time in welfare facilities for menstrual care, menopause-related needs, or additional privacy, so longer wait times in a mixed-use system may create additional stress. <p>Potential Consequence:</p> <ul style="list-style-type: none"> • Female firefighters may be disproportionately affected by queuing delays or lack of availability, which could reduce their operational readiness and well-being. <p>Proposed mitigation:</p> <ul style="list-style-type: none"> • Maintain designated women-only cubicles to ensure availability and fair access. • Consider PHU usage monitoring to assess whether facility access remains equitable across genders. <p>Safety and safeguarding risks:</p> <ul style="list-style-type: none"> • Some female staff may feel vulnerable using a mixed-gender facility, particularly in confined spaces with limited external oversight. • While LFB's workforce operates with professionalism and respect, concerns about inappropriate behaviour (or even the perception of such risks) may deter some female staff from fully utilising PHUs. • The need for discretion when managing menstrual hygiene may be heightened in a mixed-use space, leading to additional discomfort or reluctance to use the PHUs. <p>Potential consequence:</p> <ul style="list-style-type: none"> • Women may opt to avoid the PHUs altogether, which contradicts the original goal of providing equitable welfare facilities.
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	<p>Proposed mitigation:</p> <ul style="list-style-type: none"> • Ensure gender neutral PHUs are fitted with secure, private cubicles to maintain personal safety. • Introduce signage affirming the importance of maintaining respect and dignity in welfare spaces and detailing clear processes for reporting concerns. <p>Striking a balance between inclusion and gender-specific needs:</p> <p>LFB must balance the need to include transgender colleagues with the specific needs of female firefighters by ensuring that:</p> <ul style="list-style-type: none"> • PHUs remain welcoming and accessible to all staff, including those with gender reassignment needs. • Women's privacy, dignity, and access to welfare facilities are not compromised. <p>To avoid unintentionally disadvantaging female firefighters, a compromise approach may be the best solution:</p> <ul style="list-style-type: none"> • Instead of fully removing gender-specific signage, PHUs can adopt a hybrid model where at least one facility remains designated for women, while the other, formerly male facility is redesignated as gender-neutral. • Future PHU designs should consider adding an additional gender-neutral space to reduce strain on the current system and prevent negative impacts on any group. <p>This approach would respect the concerns of both trans and female staff while maintaining practicality, safety, and dignity for all operational firefighters.</p>
<p>G4. Clearly record how you will communicate the activity to those involved, especially if their protected characteristic may be a factor. You may need to consider diverse formats</p>	<p>It must be understood that this board report is for a retendering of the contract to deliver the existing PHUs to incident grounds when required. However, the procurement and availability of future PHUs will be communicated to all operational staff through internal channels, including communications emails, Hotwire updates, and staff briefings. Information will be provided in accessible formats, adhering to</p>



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<p>such as audio, large print, easy read, and other accessibility options in various materials?</p> <p>Please ensure you utilise and reference the below documentation:</p> <p>Inclusive and Accessible Documents for Neurodivergent Individuals - Tips and Resources 2024.pdf</p> <p>The-LFB-key-EDI-terminology2024.pdf</p>	<p>guidelines such as the 'Inclusive and Accessible Documents for Neurodivergent Individuals - Tips and Resources 2024.'</p> <p>Feedback channels will be established to allow staff to report any issues or suggestions regarding PHU facilities.</p>
H. Mitigating action plan (where an adverse impact has been identified, please record the steps that are being taken to mitigate or justify it?)	
Protected characteristic	Action being taken to mitigate or justify
Disability	Future PHU designs will incorporate features to accommodate staff with disabilities, such as ramps, wider doorways, and accessible fixtures.
I. EIA Owner	
Full Name: Jamie Jenkins Job title: Deputy Assistant Commissioner Department: Central Operations Date: 29/Jan/25	
To be completed by the Inclusion Team	
Review date:	

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Part two: Inclusion team to complete - feedback and recommendations

J. EIA Outcomes

☐ **Recommendation 1:**

No adverse impact(s) identified - activity continues with no change required

☐ **Recommendation 2:**

Adverse impact(s) identified - activity continues with agreed justification or mitigation in place

☐ **Recommendation 3:**

Adverse impact(s) identified - activity paused until justification or mitigation provided

☐ **Recommendation 4:**

Adverse impact(s) identified - activity paused due to potentially unlawful or adverse effects which cannot be reasonable justified/mitigated.

K. Feedback

Please specify the actions required to implement the findings of this EIA and how the programme/ activity's equality impact will be monitored in the future. It may be helpful to complete the table.

Name: [text here]

Sign-off Date:

[text here]

[text to be completed by the EIA Team]