

TYNE AND WEAR FIRE AND RESCUE AUTHORITY



Medium Term Financial Strategy

2023/2024 – 2026/2027

1 PURPOSE, PRIORITIES AND PRINCIPLES

1.1 Purpose and Priorities

The Medium Term Financial Strategy (MTFS) sets out how the Authority intends to respond to:

- the forecasted size of the financial challenge it faces in the medium term covering the period from 2023/2024 to 2026/2027;
- the constraints of the national economic and local financial landscapes;
- the risks to financial resilience; and
- the need to balance available resources with the costs of service requirements.

The financial climate over the medium term continues to be very unclear as only another one year 2023/2024 financial settlement was provided by the government, despite publication of its CSR21. This unfortunately is the fourth consecutive annual settlement and consequently makes medium term financial planning much more difficulty and uncertain. The war in the Ukraine and other economic factors have seen a cost of living crisis develop with inflation in double figures which although has subsided a little is still hovering around 8% at the time of updating the MTFS.

The Finance Settlement for 2023/2024 was released to try and help local authorities adapt and meet the unprecedented higher costs of both price and wage inflation as both escalated well above the 2% government target. The government had no choice but to deviate from its projections in its Comprehensive Spending Review 2021 (CSR21) although they continue to assure the public austerity has ended. Despite this more optimistic projection for public sector resources is the fact inflation is still at its highest level for more than a decade, the war in the Ukraine and the continuing economic implications from Covid and the EU exit are still having an adverse impact on the economy, which is still affecting the economic recovery over the medium term and as a result a more pessimistic and pragmatic outlook has been factored into the MTFS forecasts as a result.

The Authority's is also facing not only the uncertainty of its level of resources but concerns over both price and wage inflation, as costs are still significantly above the government's projections used in the CSR21. The medium term resource position has, because of all of these reasons, seen an increase in its projected deficit position to 2026/2027 to a £2.9m funding shortfall. The financial aim of the Authority therefore continues to be one of remaining sustainable so that it can continue to work effectively and efficiently and to collaborate with partners, other blue light and public sector organisations, residents and communities to deliver positive outcomes on its key service priorities to the communities it serves and will always manage service capacity within its available resources. The position is fluid and dependent on government actions adds yet another layer of complexity and uncertainty to the financial planning process.

The key outcomes that shape the financial planning of the Authority are:

- Reducing the likelihood that fires will happen (through the Prevention and Protection activities that are part of the Authority's legal duty);
- Educating the community through home safety and safe and well checks and also the promotion of measures that enable people to escape if there is a fire, or prevent the ignition and the spread of fire (sprinklers, smoke alarms, fire doors, fire retardant materials for vulnerable people etc.);

- Reducing the impact if incidents do happen. This is part of the Authority's duty to respond and provide resilience (extinguishing fires, rescuing people and being able to help the community if a major incident or disaster occurs);
- Greater collaboration with neighbouring authorities and blue light services that culminate in better outcomes for the public.

The MTFs therefore shows how the Authority will remain viable and deliver sustainable and effective fire and rescue services, whilst maximising the use of its available resources over the medium term.

1.2 Objectives

- Manage the Authority's revenue budget cost base in line with the available overall resources which also includes the revenue impact of its Capital Programme and takes into account the impact of its Treasury Management Strategy, as appropriate;
- Monitor income levels and increase them wherever possible using a more commercial approach to income generation which the Authority has successfully done over the past 5 years, including managing the changes from the Council Tax and Business Rates tax bases notified by the Authority's constituent Local Authorities and also to implement increases to its Council Tax precept level which it can influence directly but only to the extent allowed by government regulation;
- Prudent use of reserves and balances as appropriate to smooth the transition to a lower cost base, to provide temporary funding if required until IRMP actions are implemented or alternatively to reinvest in service priorities where resources permit, to address unforeseen challenges, and ensure that longer term budget liabilities and risks are adequately considered and provided for; and
- Seek to influence where possible and benefit from public sector reforms as these develop.

1.3 Approach and Principles

Our approach to financial planning is underpinned by ensuring overall resources are well managed, provide value for money and are sufficient in order to provide a sustainable and effective fire and rescue service for the diverse communities it serves across Tyne and Wear and fully embeds the aims of the Public Sector Equality Duty (PSED) to eliminate unlawful discrimination, to foster good relations and to advance equality of opportunity.

The MTFs is therefore consistent with the priorities the Authority is pursuing, as articulated in both its current Strategic Community Safety Plan (SCSP) and its recently approved Corporate Risk Management Plan (CRMP).

The principles that will influence the choices the Authority will make in the future are summarised by:

Community Protection and Leadership

Continuing a culture and system of governance which continues to be transparent, inclusive, diverse, adheres to the aims of the PSED, democratic and fits with best practice for the Fire and Rescue Service. The fact that the Authority's CRMP must be appropriately consulted upon amongst its communities and key stakeholders shows that the Authority already has these values and criteria well embedded into its current processes.

The annual revenue budget is also consulted upon before it is approved by members, which also takes into account all budget efficiencies that have been identified and quantified, the impact of its IRMP proposals, its Capital Programme and its Treasury Management policies and strategies.

Working closely with Partners

Maintaining cost effective partnerships, and establish greater collaboration through closer working with other 'blue light' services and public sector organisations. The Authority has an excellent track record of strong partnership and joint working arrangements with other 'blue light' services which it is further enhancing with the strong collaborative working that the Authority is already engaged with.

These include:

Sunderland City Council (SCC) – Lead Authority – Service Level Agreement (SLA) provides specialist services such as Legal, HR, and Architectural, housing the council's CCTV operations at Station Headquarters and any other joint initiatives that benefit both parties;

Northumbria Police – Co location at some of our community fire stations;

North East Ambulance Service (NEAS) – Co location and use of some of our community fire stations;

Northumberland Fire and Rescue Service (NFRS) – The Authority provides backup Command and Control arrangements and has other operational joint arrangements in place via a public finance initiative. The Authority also provides stores and vehicle repair and maintenance facilities to NFRS under a Service Level Agreement (SLA);

Collaboration in joint tendering arrangements nationally for PPE and also with other North East FRA's regarding procurement of uniforms or any other initiatives where it is beneficial to do so;

SafetyWorks! – which receives support from a wide range of external organisations, including Northumbria Police, Northumbria Police and Crime Commissioner, Nexus, and Sainsburys to provide a multi-agency interactive safety centre serving the communities of Tyne and Wear.

Other organisations where co-location and collaborative working helps the Authority to maximize the use of its property portfolio and helps generate commercial income as a result.

Reducing demand, changing expectations and behaviour:

- managing and reducing demand for services through changing behaviours via home safety and safe and well visits, use of sprinklers, fire safety checks, smoke alarms, changes to false alarm call responses and providing education and training to the public and business communities in order to reduce fire and rescue

incidents.

- changing expectations about the level and scope of the fire service whilst still demonstrating how the Authority meets all of its statutory requirements and those included in the Fire and Rescue National Framework. The changes implemented in respect of the revised Response model operated by the Authority is a good example of using its limited resources to maximum effect to the benefit of the community of Tyne and Wear.

Investing in prevention and early intervention measures

Assessing risk and taking actions early in order to prevent incidents from occurring, but responding appropriately to incidents if they do happen in an appropriate and measured way.

Productivity and Value for Money

Making sure that the fire and rescue service provides value for money and maximises the potential use of all available assets, be they in the public, private or third sector within the community.

1.4 Performance Management

The Authority has robust performance management arrangements in place to ensure value for money, sustainability, efficiency gains and the effectiveness of resource allocations that can be demonstrated across the service.

Partnerships and commissioned service delivery have mechanisms in place by which performance against these can be measured and managed. This will be strengthened in order to provide an increasing understanding of performance against priorities set within the context of the financial resource envelope.

2. Medium Term Financial Forecast

- 2.1 The medium term financial forecast is formally reported to members at the February Authority meeting as part of the Revenue Budget setting exercise each year. This forecast currently assumes no changes to the Authority's structure or single tier status and uses previous budget plans as a basis for the forecasts produced. Forecast income is based on the best data available from both internal and government sources.
- 2.2 The starting point for the Forecast is the current financial structure of the Authority, and assumes that the government's view that austerity has ended is correct and sustainable. Income from government is thus based on the fourth consecutive one year (2023/2024) Settlement using the increased flexibility for council tax that allowed a flat rate increase of £5 which was welcomed, the unexpected continuation of the Local Services Grant and grant funding increased in line with September's (10.8%) inflation rate. The Settlement for 2023/2024 was therefore better than expected however pay awards of 7% in 2022/2023 and a further 5% in 2023/2024 for grey book staff coupled with higher inflation across the whole economy saw most of the additional resource utilized to meet these higher cost implications, although the pay award for green book staff is still not agreed but is already in excess of the budgetary provision. The cost of living crisis will continue to have an impact on the revenue budget over the medium term as inflation remains very high (around 8%) compared to the government's original target of 2% throughout the CRS21 period. It remains to be seen if government policy and funding

reflects the higher costs still being incurred by the fire service and that the flexibility for council Tax is continued. Future planning has not anticipated this position and so represents a worst case scenario for service planning purposes on the basis a better settlement means more freedom to improve the service should it transpire. The remaining settlements covering the next three year period (2024/2025 to 2026/2027) are therefore still not known as the government has clearly departed from its own CSR21 forecasts for public spending.

- 2.3 Forecast cost pressures and future resources are affected by a number of factors, some that are within the Authority's control and others that are not. Given the past government announcements in the Local Government Settlement and Budget there are significant changes planned for local government finance which have now been further delayed until the next Parliament. These changes are still being developed but the government has stated that they will not be introduced until after the next election in 2024. Consequently planning the resource position of the Authority over the medium term is proving very difficult because of the uncertainty around the detail of future finance settlements and the lack of clarity on the implications of the proposed changes to the system for allocating resources for the rest of local government as this may impact on the fire service indirectly.
- 2.4 The Authority as part of the budget setting exercise and to inform the MTFs provides more detail of the material factors that are likely to affect the Authority's Budget forecasts up to 2026/2027 in its Budget Planning Framework Report produced each November. This information is supplemented with confirmation of the detailed resources released by the Government (usually in early December) in the Local Government Finance Settlement each year.
- 2.5 The updated MTFs published each February informs the Efficiency Plans of the Authority as required and is also the main reference point for government should they require a formal response to any Home Office initiatives (eg Funding, Productivity or Efficiency Savings).
- 2.6 The MTFs is also predicated on assumptions that the Council Tax precept will increase by only 1.99% per annum over the period despite the additional flexibility afforded in 2023/2024 (as this was not confirmed as an ongoing feature of future finance settlements), and that its growth in both the Council Tax base and its share of local business rates will continue to be fairly slow until the impact of the pandemic eases and businesses recover to pre covid levels which may take longer to achieve and remains a factor that is prudently reflected in the forecasts at this stage.
- 2.7 The current published MTFs has not incorporated any new assumptions for the national economic outlook at this point because of the unknown implications that the EU exit and the Pandemic have had on the wider economy and the sustainability of the government's public spending limits. If the assumptions assumed in the current MTFs published in February 2023 were to materially change then the Authority's financial outlook and MTFs would be amended and reported to Authority appropriately.
- 2.8 The latest MTFs set out below in Section 2.10 includes all budget efficiencies achieved to date and includes the draft CRMP proposals included in the current CRMP (2021 to 2024) that the Authority has agreed and the Authority has now implemented. At this time it is not anticipated that any changes to these proposals will be made so the MTFs reflects these actions. Should efficiencies need to be made in future years then these actions would result in a supplementary CRMP that would need Authority approval. Work is also ongoing to draw up a new CRMP which will cover the period 2024 to 2027 although this had not been approved by Authority at this stage.

2.9 There remains at this time continued and considerable financial uncertainty, with now four single year Settlements provided by the government as it continues to manage out the implications of the EU exit, the pandemic and the continued impact of the war in the Ukraine and the cost of living crisis as inflation remains significantly higher than the governments annual targets. The underlying message from the government despite all of these major factors is that austerity is over and their spending plans continue to reflect this position.

The government also confirmed it will introduce changes to the way local government will be funded in the form of a review of business rates but not until the next Parliament which is a concern as this was supposed to be in place by 1st April 2022. There continues to be very little in the way of detail being released on the impact this may have on local authority resources. It is hoped that this clarity is provided by the government in advance of its introduction in the next Parliament where preferably there will be a resumption of a multi-year settlement.

The MTFS is being monitored closely because of all of these uncertainties and a revised MTFS will be provided to Authority should any major issues or factors occur that could have a material impact on the current financial planning within the current MTFS set out below.

2.10 The current MTFS summary position published in February 2023 is set out overleaf:

MEDIUM TERM FINANCIAL STRATEGY 2023/2024 TO 2026/2027

	2023/2024	2024/2025	2025/2026	2026/2027
	£'000	£'000	£'000	£'000
Base Budget	52,002.63	57,200.55	58,195.40	59,126.15
Net Cost Pressures	5,197.92	994.85	930.75	949.38
Net Expenditure	57,200.55	58,195.40	59,126.15	60,075.53
Resources:				
Government Based Funding				
Top Up Grant (index linked to rpi)	12,162.24	12,405.48	12,653.59	12,906.67
Revenue Support Grant	10,202.87	10,406.92	10,615.06	10,827.36
Business Rates Share	3,414.57	3,414.57	3,414.57	3,414.57
Service Delivery Grant	628.72	0.00	0.00	0.00
SFA Adjustment	2,747.08	2,802.02	2,858.06	2,915.22
	29,155.47	29,029.00	29,541.29	30,063.82
Local Resources				
Council Tax (Precept) Income*	27,505.15	28,052.51	28,610.75	29,180.11
Collection Fund - Council Tax Surplus	385.34	0.00	0.00	0.00
Collection Fund - Business Rates Surplus	154.58	0.00	0.00	0.00
	28,045.08	28,052.51	28,610.75	29,180.11
Total Income (Resources)	57,200.55	57,081.51	58,152.04	59,243.93
Real Funding gap in year	0.00	1,113.89	974.11	831.60
Cumulative gap before use of reserves	0.00	1,113.89	2,088.00	2,919.60

Planned use of reserves	0.00	1,113.89	974.11	831.60
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Total Resources	57,200.55	58,195.40	59,126.15	60,075.53
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*assumes 1.99% increase in precept in each year despite the additional flexibility provided in 2023/2024

2.11 In summary, the updated MTFs shows a balanced budget position for 2023/2024 and overall a net deficit in resources by 2026/2027 of £2.9m but this position does not take into account any budget efficiencies that may be generated from 2023/2024 onwards or any CRMP actions that may be considered necessary should the projections based on a single year finance settlement for 2023/2024 over the medium term prove to be correct. Price and wage inflation has been considered and increased for known cost variations but these could change should inflation remain high and public sector wage constraint prove unsustainable.

As mentioned this is considered a worst case scenario at this stage with all known data being used to assess the situation over the Medium Term. A General Election in 2024 may possibly see a change in government and a change in government policy on public sector spending. The current government may continue to support the public sector whilst inflation remains high in which case the resources position may change from the financial assessments currently anticipated. These are uncertainties cannot be measured nor planned for with any degree of accuracy and may as a consequence have a material impact on the financial position of the Authority's MTFs. Conversely if resources should reduce and austerity has not in fact ended then the Authority will have no option but to amend its spending plans for the service accordingly based on the revised information in a further refreshed and updated MTFs.

The Authority will thus always amend and adapt its spending plans to match its projected resources as it has done successfully in every year since it was established. It has a strong track record in this regard and has reserves available to use temporarily in order to bridge any funding gap in resources before actions are taken to make the necessary savings to achieve a more stable and sustainable budget for the fire service.

2.12 The implication of another one year settlement to the Authority is that it is very difficult to plan the service moving forward until it has a much clearer view and more certainty of its resources over the medium term beyond the fourth single year settlement of 2023/2024 provided by the government, despite the publication of the CSR21. This has not been helped by the fact there was additional flexibility provided in 2023/2024 which cannot be relied upon in 2024/2025 or in future years at this stage. (This included retention unexpectedly of the one-off Service Delivery grant funding in 2022/2023 - although this was reduced from £1.1m to £0.6m in 2023/2024. It is unclear if this will continue in future years and has not been factored into the MTFs for this reason. Council Tax was also increased by a flat rate increase of £5 (equivalent to a 5.76% increases) significantly higher than the previous 1.99% increases of the past. This increase was welcomed and would be helpful if it continued for 2024/2025 but government have not provided any indication this will be allowed and as such this has not been anticipated in the future forecasts contained within the MTFs. Obviously this would be a welcome boost to resources should this be continued in 2024/2025. These two issues being excluded has caused an adverse change in the financial outlook for the Authority in this revised MTFs for 2023/2024 to 2026/2027 by increasing its projected shortfall in resources from £2.3m to £2.9m although the implications of future resources may improve this position should either or both of these measures be continued in 2024/2025.

- 2.13 The Authority has a robust Reserves Policy which details under what circumstances and how each of the Earmarked Reserves or General Fund Reserve can be used to temporarily support the MTFS as illustrated in the “planned use of Reserves” line of the MTFS shown in paragraph 2.10 above.
- 2.14 The Authority also has an ambitious yet affordable Capital Programme underpinned by a strong and prudent Treasury Management Strategy that ensures this is prudent, sustainable, making the best and effective use of the Authority’s existing resources and also limits the impact and exposure on the Authority’s Revenue Budget, which is important should revenue resources not match anticipated funding set out in the CSR21.

3. Risks Associated with the MTFS

- 3.1 As mentioned there remains a number of uncertainties and the risk to the current revised forecast are considered significant.

These include:

- The impact of national economic performance on public sector finance following the implementation of the EU exit and the continuing impact of the pandemic and the war in the Ukraine;
- The continued buoyancy of the national and local economy;
- Fundamental review of relative needs of local authorities in a national funding Regime to be introduced in the next Parliament;
- Business Rates Funding System Review – Funding system is to allow local authorities to retain 75% of their Business Rates but this too has been delayed further and will now not impact until the next Parliament apart from those in the existing trial, the risk to the Authority remains beyond 2024/2025 however depending on outcomes;
- Inflation – a 1% variance in pay equates to £0.450m and a 1% change in prices would have a £0.100m impact on expenditure assumptions;
- Treasury management – the extent to which cash balances will drive the need to borrow to finance capital investment and the continued poor return on investments;
- Change management (CRMP actions) risk, and the sustainability of existing budget decisions and alternative service delivery options;
- Contractual risk;
- What, if any, aspects of public sector reform will mean for the Authority and it’s financial resources (such as an alternative mayoral controlled fire service);
- Impact of demographics in terms of both additional demand and additional growth;
- The potential costs of transition and further restructuring;
- Triennial valuations of the local government and Firefighters pension

schemes;

- Pension remedy for all public sector schemes and their financial impacts which continue to be complex and uncertain;
- Pay award uncertainty and unaffordable pay escalation;
- The impact on the economy of the war in the Ukraine (which has already had an impact on fuel costs and higher prices for some goods and services) on the economy and public sector spending in the longer term; and
- Uncertainty from the government despite the publication of the CSR21 as this has not delivered a multi-year settlement which was desperately needed to help effective planning for the fire service.

Document reference	MTFS1	Document type	RECORD
Version	1	Date of issue	Sept 2023
Classification	PUBLIC		



MTFS1 RECORD OF EQUALITY IMPACT ASSESSMENT

Title of Proposal : Medium Term Financial Strategy 2023/24 to 2026/27							
Completed By: Dennis Napier				Department: Financial Services			
Contact Details:Dennis.napier@twfire.gov.uk				Date of Submission:14/09/2023			
Is this Proposal:							
New <input checked="" type="checkbox"/> Updated <input type="checkbox"/> Other <input type="checkbox"/> Specify:							
ANALYSIS RATING (Please tick one)				*In the case of an Amber Rating, proportionate, objective justification must also be ticked.			
RED		AMBER		GREEN	<input checked="" type="checkbox"/>	Proportionate, Objective Justification	

Intended Outcomes

Summary of intended outcomes and benefits of the proposal? These should be linked to strategic or corporate outcomes where appropriate.	<p>The Medium Term Financial Strategy outlines the current and future planned levels of financial resources and likely revenue budget from 2023/24 to 2026/27 using the best available data held by the Authority. It is a statutory and government requirement that all public sector bodies establish a MTFS by their Section 151 officer so that service planning can be carried out to ensure the fire service remains effective, efficient and sustainable over the medium term. The Home Office and the National Fire Framework for all Fire and Rescue Services specify the need to provide a current MTFS and to publish this for the use by key stakeholders and decision makers. The MTFS is reviewed regularly and reported to members of the Authority if the position should change materially from that set out and approved each February as a part of the Revenue budget setting cycle. The MTFS is a key document to help indicate the available resources for the service so that service planning can be carried out, annual budgets can be agreed and that future financial forecasts help to ensure the service remains resilient and sustainable.</p>
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<p>Who will be affected by the proposal and in what way? (e.g. applicants, employees, local communities other services etc).</p>	<p>All communities served by, and stakeholders in the Fire Authority will all be affected by the implementation of this Strategy, which sets out the current and future financial resource position for service planning purposes and to ensure the Service remains resilient and sustainable over the medium term as set out in the Strategy.</p>
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Data and evidence collection

<p>Please list sources of information have been used to inform this analysis.</p>	<p>Consultation with ELT/ SLT and the Inclusion Manager National Fire Framework Professional Codes and Best Practice</p>
<p>Are there any gaps in the data or intelligence available?</p> <p>If so please describe what they are and what actions have been taken to obtain or improve the information.</p>	<p>None identified</p>

Establishing Relevance and Equality Analysis

- Demonstrate how you used the data and evidence listed above
- Demonstrate consideration of the actual and potential impact
- Demonstrate actions taken to reduce or eliminate negative impact
- Consider whether the proposal will or is likely to influence TWFRS’s capacity to meet the PSED aims to:
 1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act and other relevant legislation.
 2. Advance equality of opportunity between different groups of people.
 3. Foster good relations between people who share a protected characteristic and those who do not.

Protected Characteristic	Neutral Impact	Positive Impact	Negative Impact	Justification for rating (neutral/positive/negative) and actions taken to reduce negative impact and / or increase positive impact
Age	✓			Could be a positive impact if specific resources benefit any one or more groups sharing protected characteristics require and are allocated funding from the revenue budget.
Disability	✓			Could be a positive impact if specific resources benefit any one or more groups sharing protected characteristics require and are allocated funding from the revenue budget.
Gender Reassignment	✓			Could be a positive impact if specific resources benefit any one or more groups sharing protected characteristics require and are allocated funding from the revenue budget.
Pregnancy & Maternity	✓			Could be a positive impact if specific resources benefit any one or more groups sharing protected characteristics require and are allocated funding from the revenue budget.
Race - this includes ethnic or national	✓			Could be a positive impact if specific resources benefit any one or more groups sharing protected characteristics require and are allocated funding from the revenue budget.

origins, colour or nationality				
Religion / Belief - this includes lack of belief	✓			Could be a positive impact if specific resources benefit any one or more groups sharing protected characteristics require and are allocated funding from the revenue budget.
Sex	✓			Could be a positive impact if specific resources benefit any one or more groups sharing protected characteristics require and are allocated funding from the revenue budget.
Sexual Orientation	✓			Could be a positive impact if specific resources benefit any one or more groups sharing protected characteristics require and are allocated funding from the revenue budget.

Will this proposal impact people who are marginalised as a result of other characteristics not protected by the Equality Act 2010? E.g. social economic factors (i.e. poverty and or isolation, caring responsibilities, unemployment, homelessness, urbanisation, rurality, health inequalities or any other disadvantage). It may also be relevant to consider whether all employees of the service are able to equally access your proposal, given the diversity of roles within the organisation.

Identified Characteristic	Neutral Impact	Positive Impact	Negative Impact	Justification for rating (neutral/positive/negative) and actions taken to reduce negative impact and / or increase positive impact
Various	✓			Could be a positive impact if specific resources benefit any one or more groups sharing protected characteristics require and are allocated funding from the revenue budget.

Response to Analysis, Action Plan and Monitoring

Recommendations

Decision	Rating	Statement of Justification
Continue as planned, no major change.	GREEN ✓	This Strategy has been developed as an aid to supporting the goals and objectives of TWFRAs by providing essential financial guidance and planning over the medium term.
Continue as planned but some adjustment to the proposal may be required before proceeding. Ensure actions are completed before submitting proposal.	AMBER	
Stop the proposal.	RED	
Proportionate, Objective Justification		

Monitoring and review

What procedures are in place to monitor the impacts outlined in the analysis?	Review of the Strategy including a refresh of the values and impacts of the Strategy will be under continuous review.
How often will this take place?	Annual
Date of next planned review?	September 2024

Declaration: I believe that due regard has been paid to the aims of the Public Sector Equality Duty as it relates to the proposal.

Completed by:	Dennis Napier	Date:	20/09/2023
Head of Dept:	Dennis Napier	Date:	20/09/2023

Please follow section 6 of the BSI001 Policy & Procedure Writing Guidance in order to progress the proposal and accompanying Record of EIA through the consultation process. No proposals are to be published without an accompanying EIA.