

F1457 A1 Equality Impact Assessment (EqIA) form

N.B: the completed form should be emailed to the [Diversity and Inclusion team](#)

Project	Wembley Park Station Car Park Development
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	Signature	Date

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	1.0	04/03/2020	Final
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Project Related Documents	Doc No.	Document title	Relevant Section(s) of this Document
	1	Site Plan	



Step 1: Clarifying Aims

Q1. Outline the aims/objectives/scope of this piece of work

Strategic context

Transport for London is one of the capital's largest landowners, with a 5,700-acre estate that has enormous potential to help deliver the much-needed new homes and jobs London needs. TfL's land holdings have the potential to play a vital role in meeting the Mayor's priorities to build new and affordable homes.

Purpose

Transport for London is working to deliver housing on land within the ownership of London Underground and other TfL functions in support of the Mayor's ambitions to free up public land for new housing.

Pursue the construction of 456 new private and affordable homes, commercial property and public realm on land owned by London Underground adjacent to Wembley Park Station.

Pursue the Principles of Good Growth as outlined in the Mayor's Transport Strategy and draft London Plan.

Main Activity

The Site is located next to Wembley Park Underground Station in the London Borough of Brent and comprises a public car park operated by NCP, as well as Jubilee Line Train Crew Accommodation (TCA), a Back-up Control Facility (BUCF) and associated staff car parking.

The Site is accessed by vehicles from Brook Avenue, which bounds the Site to the south, with one point of pedestrian access from Brook Avenue and a second pedestrian access to the east leading to the station entrance. Railway tracks run adjacent to the northern boundary and a flatted residential development sits to the west. The public car park comprises 83 spaces, including 1 motorcycle space, plus an additional 12 spaces for blue badge holders (disabled parking). There are also two dedicated spaces for taxis with a single Electrical Vehicle Charging Point (EVCP).

TfL Commercial Development has appointed a joint venture partner (Barratt London) to deliver the development opportunity. The principal business objectives for the development are as follows:

- To maximise value
- To create a high quality residential-led development scheme
- To deliver a policy compliant scheme with the relevant level of affordable homes (50%)
- To secure all relevant planning permissions and other consents to progress the redevelopment of the site
- To re-provide LUL Operational Facilities in accordance with requirements
- Stakeholder engagement

This is an initial Equalities Impact Assessment. This has been and will continue to be updated over time.

Key project milestones are

December 2019 – enter into the Conditional Joint Venture Agreement
March 2020 – submit planning application
February 2021 – start on site
July 2024 – practical completion

Timeframe

To achieve planning permission and start on site in February 2021, completing the development in approximately July 2024.

The future of Wembley

The Wembley Area Action Plan (WAAP), developed by the London Borough of Brent, sets out the strategy for growth and regeneration in Wembley until 2030. The WAAP identifies Wembley as a destination to help drive economic regeneration of Brent, alongside providing new homes and promoting its cultural and leisure offer. The site is located within the Wembley Growth Area, which seeks to provide at least 11,500 new homes by 2026. The emerging Brent Local Plan increases the housing delivery target for the Wembley Growth Area to 15,000 which shall be delivered by 2041. As part of the emerging Local Plan site allocation Brent Council wish to see the site brought forward for new homes and a reduction of public car parking, to contribute to the regeneration of this important area. Our proposals respect the surrounding properties along Brook Avenue, whilst providing a high-quality development that supports the Council's adopted and emerging ambitions.

The vision

TfL Commercial Development is committed to delivering a scheme which can stand the test of time and provide lasting benefits for the borough, including:

- Optimising the delivery of new homes in a highly sustainable location with the introduction of 456 new private and affordable homes
- Five high-quality buildings along Brook Avenue delivering 50% genuinely affordable homes by habitable room
- Proportionate and considerate design that respects surrounding properties and the emerging development context in Wembley
- Relieving congestion and improving air-quality by reducing car parking
- Public realm improvements along Brooke Avenue
- A mixed-use scheme with the re-provision of workspace for TfL staff
- Small-scale retail on the ground floor which will enliven Olympic Square.
- The borough will benefit from a significant financial contribution as part of section-106 and Community Infrastructure Levy
- New job opportunities for local workers

Meeting local housing needs

The scheme will make a significant contribution towards the Council's housing target of 11,500 new homes by 2026.

New homes

We are committed to delivering new homes which will be of a high-quality in a sustainable location, close to the tubes and buses, with a range of local service available.

A range of homes would be provided including studio, one, two and three bedroom units. Each home will be designed to meet or exceed the space standards set out in the London Plan.

Affordable homes

In 2018, the London Borough of Brent identified 6,694 households who were in need of affordable housing in the borough, but do not qualify for social rented accommodation. We aim to provide an ambitious target of 50 percent affordable housing by habitable room.

Brent Council has identified the need for more affordable family homes in the borough. To help address this need, most of the three bedroom homes will be affordable in our development, to accommodate families and help to build an inclusive community.



Q2. Does this work impact on staff or customers? Please provide details of how.

There is a risk of negative impacts from a significant loss of car parking spaces in the station car park.

Currently the station car park consists of 83 parking spaces, including 1 motorcycle space, plus an additional 12 spaces for blue badge holders. While the exact number of spaces to be retained will be determined as part of the planning application process, the target is to remove all public car parking spaces apart from 12 public spaces for blue badge holders (a like for like replacement of the existing blue badge provision).

Project works will involve significant construction activity and the public car park will therefore be closed throughout this period. There will be additional noise and air quality impacts of construction.

It is proposed that the project team work with LBB to provide formal on-street blue badge car parking for on Brook Avenue during the construction phase, whilst the general public blue badge spaces are not available. This would enable blue badge holders to park at all times. These new blue badge spaces would be subject to traffic regulation orders requiring statutory consultation by LBB prior to being implemented by LBB if successful.

Car Park Surveys

Two surveys were commissioned to establish the user profile and occupancy of the car parks:

Tracsis PLC, a survey company, was commissioned by TfL to conduct a car park user survey for the public car park.

- The survey was conducted via face-to-face interviews, paper questionnaires (returned by post) and online questionnaires.
- Face-to-face interviews conducted between Wednesday 4th July and Saturday 7th July
- 2018, between the hours of 06:00 and 21:00.
- Captures weekday and weekend users.

Intelligent Data Collection, a survey company, was commissioned by Steer to conduct occupancy surveys.

- A manual snapshot parking occupancy count was conducted followed by 24-hour arrival and departure counts.
- The surveys commenced at midnight Monday/Tuesday 4th February 2020, with Tuesday being a neutral weekday, outside of school holidays and when no events were held at Wembley Stadium.

The majority of public car park users arrive during the morning peak period between 07:00 and 09:00. The departure profile, although more dispersed, shows that majority of public car park depart during the afternoon peak period between 16:00 and 19:00. A secondary peak of arrivals and departures was observed, between 11:00 and 12:00.



Majority of survey respondents (81.1%) stay at the car park for between five and 24 hours. 7.9% of respondents stayed at the car park for more than a day with 11% respondents leaving in less than four hours.

The survey shows that 62% of car park respondents use the car park one day a week or less frequently, with only 16% respondents parking between four and seven days per week. This indicates that the car park is less likely to be used by regular commuters.

On average, each vehicle carries 1.57 occupants, with the majority (59.7%) of survey respondents travelling alone.

Few survey respondents (1.6%) stated that they are 65 or older, with the majority (37.8%) aged between 35 and 44.

Only two out of 129 survey respondents stated that they have physical or mental disabilities, which represents 1.5% of responses.

The face-to-face surveys show that the majority of car park users travel from within LBB. While most respondents said they continue their journey from the car park using the London Underground (65%), the majority of station users reach the station by bus (30%), walking (52%) and not by private car (7% for car drivers, 11% drop-off).

More than a half (51%) of survey respondents began their journeys in LBB, with further 17% coming from London Borough of Harrow. 17% journeys originated in other London boroughs with only 14% of respondents traveling from outside London.

65.1% of respondents stated that they will continue their journey on the London Underground network. Of those continuing their journey on the London Underground, the destination station was located on either the Metropolitan or the Jubilee lines for 64.3% of respondents. The most common destinations included Baker Street (15.5%), Bond Street (9.5%) and Liverpool Street (7.1%) stations.

41% of respondents stated that reducing the number of available parking spaces would encourage them to stop using the car park. One in five respondents stated that they would travel by public transport, on foot or by cycle had the car park not been available.

Step 2: The Evidence Base

Q3. Record here the data you have gathered about the diversity of the people potentially impacted by this work. You should also include any research on the issues affecting inclusion in relation to your work

Age

Brent has a relatively young population. In 2017, the median age of the population in Brent was 35 years, the same as in London, but five years lower than the national average (40 years, UK).

Compared with the UK, Brent has proportionately fewer over 50s and proportionately more adults aged 25-49. In Brent, 28% of the population is aged over 50 compared with 37% across the UK. Conversely, 39% of the borough's population is aged 25-49 compared with 33% in the UK.

The scheme is expected to deliver 456 homes with 50% affordable housing, which will help to tackle the affordability crisis the capital is currently facing. Brent has a relatively young population and the scheme will help to support first time buyers with its affordable housing offering.

Public realm improvements will also be delivered, along with improved wayfinding, helping to create a sense of place.

There will be a loss in car parking spaces used by the public, with more than half used to access the station. Although blue badge parking will remain, older users of the car park may be less mobile but not qualify for a blue badge.

Disability

The 2011 Census found that around one in seven Brent residents (14%) had a long-term health problem or disability that limited their day-to-day-activities in some way: 7% said their activities were limited a lot, and 7% said their activities were limited a little.

A survey undertaken from 2015-2017 found that 16.4% of working age residents in Brent are disabled (16-64), which is slightly above the London average.

Race

Brent is the second most diverse borough in London, after Newham. In total, 65% of Brent residents are from Black, Asian and minority ethnic backgrounds, compared to 43% on average across London.

The majority of the population in Brent are of Indian ethnicity, followed by White (other groups) and White British.

Mixed ethnic groups make up the highest proportion of 0-17 year olds in Brent, followed by Black (other groups), Arab and then Black African. In the 18-64 category, the highest proportion when compared to other ages for each ethnic group is White (other groups), followed by Chinese, Indian and White British. The groups with the highest proportion of over 65 year olds are White Irish, followed by Black Caribbean, White British and Indian.

Religion/ Belief

The borough's three largest religious groups are Christian (41%), Muslim (19%) and Hindu (18%). Other smaller, but significant, groups represented in the borough included: Jewish and Buddhist residents (both 1.4%) and Sikh residents (0.5%).

The borough has the second largest Hindu population in England and Wales, after Harrow and the 10th largest Muslim population nationally (as a percentage of the population).

Sexual orientation

The 2017 GP Patient Survey found that 4.6% of Brent adults surveyed identified as Lesbian, Gay, Bisexual (or 'Other'). The percentage in Brent was below the London average (5.4%) but well above the England estimate (3.3%). The GP Survey provides Borough level data and tends to provide slightly higher estimates compared with other sources.



Step 3: Impact

Q4. Given the evidence listed in step 2, consider and describe what potential short, medium and longer term negative impacts this work could have on people related to their protected characteristics?

Protected Characteristic		Explain the potential negative impact
Age	Y	<p>Loss in car parking spaces- There will be a loss of car parking spaces used by the public, which are mostly used to access the station. Although blue badge parking will remain once the development has been completed, older users of the car park may be less mobile but not qualify for a blue badge. The result of the car park survey does however show that the car park is used infrequently by over 65's (2%).</p> <p>Parents with young children and pushchairs may currently use the car park and will need to find alternative modes of transport. Other modes of transport include travelling by bus, taxi or arranging a lift. The step free access will remain, and there are other car parks located in the area, including Wembley Stadium, Civic Centre and car parks operated by Wembley Parking Ltd. and Green Parking Ltd. There is also car parking available at Preston Road and Neasden, which are both one stop away on the Jubilee/ Metropolitan Line.</p> <p>Development will mean construction traffic and works for the duration of the build period, so public safety will need to be managed carefully.</p> <p>We are also currently in contact with Michael Barratt (Development Impact Assessment Manager, Network Management) regarding inclusive construction considerations.</p>
Disability including carers	Y	<p>While blue badge parking will be retained in the new development, all other public car parking spaces will be removed and some people with disabilities may not necessarily meet the criteria to qualify for a blue badge. They will therefore need to find alternative means of transport when travelling to the station. Other modes of transport include TfL dial a ride, bus, taxi, arranging a lift, and there are other nearby car parks.</p> <p>It is proposed that the project team work with LBB to provide formal on-street blue badge car parking on Brook Avenue during the construction phase, whilst the general public blue badge spaces are not available. This would enable blue badge holders to park at all times. These new blue badge spaces would be subject to traffic regulation orders requiring statutory consultation by LBB prior to being implemented by LBB if successful.</p> <p>The station step free access will remain open throughout the construction period and thereafter.</p>

		<p>Development will mean construction traffic and works for the duration of the build period, so public safety will need to be managed carefully.</p> <p>We are also currently in contact with Michael Barratt regarding inclusive construction considerations.</p>
Gender	Y	<p>We know from Understanding Diverse Communities that women are still predominantly the primary carers of young children so will be impacted as they will no longer be able to use the car park and will have to rely on alternative modes of transport. Other modes of transport include bus, taxi, arranging a lift, and there are other nearby car parks that can be used. The step free access will remain open throughout the construction period and thereafter.</p>
Gender reassignment	N	No impact
Marriage/civil partnership	N	No impact
Other – e.g. refugees, low income, homeless people	N	No impact
Pregnancy/maternity	Y	<p>Pregnant women and those with young children will no longer be able to use the car park and will have to rely on alternative modes of transport. Other modes of transport include, bus, taxi, lift, and there are other nearby car parks available.</p> <p>The taxi rank (outside the front of the station, located next to Brooke Avenue) and the lift providing step free access to the station</p>



		<p>will remain in operation during construction and thereafter.</p> <p>Development will mean construction traffic and works for the duration of the build period, so public safety will need to be managed carefully.</p> <p>We are also currently in contact with Michael Barratt regarding inclusive construction considerations.</p>
Race	N	No impact
Religion or belief	N	No impact
Sexual orientation	N	No impact



Q5. Given the evidence listed in step 2, consider and describe what potential positive impacts this work could have on people related to their protected characteristics?

Protected Characteristic		Explain the potential positive impact
Age	Y	<p>The scheme is expected to deliver 456 homes with 50% affordable housing, which will help to tackle the affordability crisis the capital is currently facing. Brent has a relatively young population and the scheme will help to support first time buyers. The private homes will be eligible for Help to Buy, and there are also shared ownership homes to support first time buyers with a household income below £90k, as well as London Affordable Rent to help those who cannot afford to rent or buy privately.</p> <p>Public realm improvements will also be delivered, along with improved wayfinding, helping to create a sense of place.</p> <p>Our vision supports the Mayor’s policy and enhances the public realm along Brook Avenue, making it greener, cleaner and a better place to live and work.</p> <p>We have developed proposals which provide benefits for new and existing residents along Brook Avenue, including:</p> <ul style="list-style-type: none"> » Enhanced walking route linking Brook Avenue to Olympic Way through the provision of wide pavements » The walk along Brook Avenue will be animated through small integrated features which create short moments of play » Residents will benefit from open, central podiums to accommodate varied play provision, green space and seating » Safe and enjoyable playspaces protected by railing and buffer planters
Disability including carers	Y	<p>The current provision of blue badge parking spaces for public use can be re-provided on site, and in close proximity to the station building.</p> <p>Wembley Park Station also provides step free access via a lift, located adjacent to the station car park, providing ease of access between the car park and station and this will remain accessible throughout the build period and thereafter.</p> <p>Enhanced walking route linking Brook Avenue to Olympic Way through the provision of wide pavements.</p> <p>Public realm improvements will also be delivered, along with improved wayfinding, helping to create a sense of place.</p> <p>The train crew accommodation will be suitable for disabled users and provide lift access and a disabled WC. This is an improvement</p>



		<p>on the current provision as it has level access, is BREEAM excellent, and is a brand-new facility. The facility will also provide two blue badge car parking spaces. We will update the EqIA in due course as more information becomes available.</p> <p>There will be 14 blue badge spaces for residents and wheelchair accessible homes.</p>
Gender	N	No impact
Gender reassignment	N	No impact
Marriage/civil partnership	N	No impact
Other – e.g. refugees, low income, homeless people	Y	Affordable homes will benefit low income households.
Pregnancy/maternity	N	No impact



Race	N	No impact
Religion or belief	N	No impact
Sexual orientation	N	No impact



Step 4: Consultation

Q6. How has consultation with those who share a protected characteristic informed your work?

List the groups you intend to consult with or have consulted and reference any previous relevant consultation? ¹	If consultation has taken place what issues were raised in relation to one or more of the protected characteristics?
Local groups and stakeholders	<p>The project team has consulted with the London Borough of Brent, the Design Review Council, the Greater London Authority and TfL Spatial Planning. All parties support the concept of residential development in this location.</p> <p>Engagement with LBB and the GLA has been undertaken to understand the concerns and pertinent issues as seen by officers and elected representatives. This is in the context of research of existing and emerging planning policy.</p> <p>We have undertaken two surveys of the car park, in 2018 and 2020, including key information on origin postcode, destination, purpose of travel and parking behaviours, and results have been included in this EqIA.</p> <p>We have also undertaken a rights of light and daylight/-sunlight study to analyse the potential impact of new development on surrounding properties.</p> <p>A Mayor’s Opinion has been received, noting the subject site to be surplus to operational requirements.</p> <p>We have sourced demographic information published by LBB in March 2019:</p> <ul style="list-style-type: none"> • Equality Profile of Brent March 2019 <p>We have also taken into consideration demographic data published by TfL:</p> <ul style="list-style-type: none"> • Travel in London – understanding our diverse communities <p>Two rounds of public exhibitions were held. The first public exhibition was held over two days, on the 29 January and 30 January 2020 and attracted 56 attendees. Attendees included:</p> <ul style="list-style-type: none"> • Lead Member for Regeneration, Property & Planning, Cllr Shama Tatler, alongside a LBB planning officer • Head Teacher of the local school (Ark Academy)

¹ This could include our staff networks, the Independent Disability Advisory Group, the Valuing People Group, local minority groups etc.



- Representative from Wembley Stadium
- TfL staff working on the site
- Local residents from Brook Avenue, as well as the wider Wembley area

The second exhibition was also held over two days, on 25 and the 26 February 2020, and attracted 25 attendees, including:

- Cllr Gaynor Lloyd
- The secretary of Barnhill Residents' Association
- Local residents from Brook Avenue, Barnhill, as well as the wider Wembley area

A total of c.1570 flyers delivered to advertise the exhibitions. Local residents, community groups and businesses were notified about the exhibitions by newsletter, distributed to a local area covering c.1570 properties. Alongside this, there was a bespoke cover letter was delivered to all residents in apartment blocks and houses on Brook Avenue.

Door-knocking was conducted along Brook Avenue to speak to local residents about the proposed development and the exhibitions. All homes and accessible apartments along the road were door-knocked. They all received a newsletter and a postcard on their doorstep. The team also spoke with a representative from the Premier Inn on Brook Avenue.

In advance of both exhibitions, an advert was placed in the 23 January and the 20 February editions of the *Brent & Kilburn Times* to advertise the consultation events.

A mailshot was sent to Oyster Card users who live in the immediate area around the site and who have opted-in to receive updates from Transport for London.

25 local stakeholders were offered briefings on the development proposals. These included local councillors, MPs, London Assembly Member, businesses and community groups.

A telephone number and project e-mail address have been made available to the local community, where residents can have their questions answered about the proposals.

The response from local residents, community groups and local representatives who expressed a view has been largely positive. In particular, comments have focussed on the following:

- There was generally agreement among consultees that the site was in need of redevelopment and there was support for the benefits the

	<p>scheme would deliver.</p> <ul style="list-style-type: none"> • Some attendees expressed concern with the lack of local parking options after the car-park is redeveloped. Questions surrounding blue badge parking provision were raised and consultees welcomed the retention of the 12 existing, publicly accessible blue badge spaces as part of the new development. • At the first consultation, some consultees questioned the height of Block E and whether it would impact surrounding views for existing Brook Avenue residents. Nevertheless, some stakeholders and residents did recognise that the site is appropriate for development considering consented nearby developments, such as the Quintain Masterplan and its location adjacent to a key transport node. • Generally, consultees felt that the area had good transport links, given the site’s proximity to Wembley Park Underground Station. The majority of respondents agree that encouraging walking, cycling and public transport use will help improve air-quality and relieve congestion in the area. The introduction of an improved pedestrianised environment along Brook Avenue was welcomed. • There was interest about the types of retail that would be provided in the ground floor of block E. Attendees generally stated that they would like to see a coffee shop, convenience store, juice bar or community space. Some attendees were against the idea of having a bar within the space as they wanted to restrict the sale of alcohol on the premise. • The majority of those who responded strongly agree that the improved public realm and green landscaping will be a welcome addition to this part of Wembley. • The majority of respondents agree or are neutral about the provision of affordable housing in order to address the housing shortage in Brent. <p>Following submission of the planning application in March 2020, notification letters with details of the application were sent to local residents and stakeholders.</p>
<p>London Underground Limited</p>	<p>At present there are currently 239 LUL employees based at the Wembley Park Train Crew Accommodation (Crown House). This figure includes 12 managers, 2 admin and 225 train drivers – the number of train drivers is expected to increase to 250 in 2021</p> <p>We have been working with LUL to agree a set a of requirements and layout plans for the new Train Crew Accommodation, which is being re-provided on site. Layout plans for the new facility have been shared with the TfL Move & Accommodation Team, Train Operations Manager, Trade Union</p>



	<p>representatives, the Head of the Jubilee Line and Director of Line Operations.</p> <p>LUL staff car parking will be retained (x40 spaces) as this is required to ensure the business can meet its current and future essential operational requirements.</p>
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Q7. Where relevant, record any consultation you have had with other projects / teams who you are working with to deliver this piece of work. This is really important where the mitigations for any potential negative impacts rely on the delivery of work by other teams.

Name	Title
TFL PROPERTY DEVELOPMENT	
Jonathan Cornelius	Head of Property Development
Emma Hatch	Senior Development Manager
Rachel Wood	Property Development Manager
Danny McEvoy	Project Engineer
Diana Thomson	Savills Consultant Planner
Joshua Lindsey	Communication & Engagement Specialist
TFL COMMERCIAL DEVELOPMENT	
Asher Frawley	Senior Commercial Manager
Meera Mehta	Commercial Manager
Alex Knight	Senior Surveyor
Fiona Wilson	Operational Accommodation Manager
Christine Peppiatt	Lead Projects & Accommodation Manager
TFL LINE OPERATIONS	
Nick Dent	Director of Line Operations



Amy Owen	Head of Jubilee Line Operations
Joe Brown	Trains Operations Manager
OPERATIONAL INTERFACE MANAGER	
Bob Aley	Operational Delivery Manager
WEMBLEY PARK STATION	
Danny Asare	Area Manager Wembley Park
Ajaya Bhatt	CSM Wembley Park
SECURITY	
Peter Sinden	Security Risk Manager
BUILDING MANAGEMENT	
Mark Brayne	Building Manager
REFUSE	
Laura Hyman	Waste and Systems Improvement Manager
Rohan Grant	Improvements Field Engineer

Step 5: Informed Decision-Making

Q8. In light of the assessment now made, what do you propose to do next?

Please select one of the options below and provide a rationale (for most EqIAs this will be box 1). Please remember to review this as and when the piece of work changes

1. Change the work to mitigate against potential negative impacts found	<input checked="" type="checkbox"/> Changes to the work already undertaken are detailed in this document. Mitigation measures are detailed in Step 6: Action Planning.
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2. Continue the work as is because no potential negative impacts found	
3. Justify and continue the work despite negative impacts (please provide justification)	
4. Stop the work because discrimination is unjustifiable and no obvious ways to mitigate	

Step 6: Action Planning

Q9. You must address any negative impacts identified in step 3 and 4. Please demonstrate how you will do this or record any actions already taken to do this. Please remember to add any positive actions you can take that further any positive impacts identified in step 3 and 4.

Action	Due	Owner
Send internal layouts of TCA with LUL ahead of submitting planning application for development.	March 2020	RW
Review ongoing blue badge car parking spaces for the public.	March 2020	RW
Updating the EqIA as the project progresses	Updated monthly if required	SB
Construction – produce a construction management and phasing plan that mitigates impact on public areas.	Ongoing	Barratt London



Signed Off By	EQIA Author	Sophie Brown
		Date 4-3-20
	Signature	
	EQIA Superuser	Frances McAndrew
	Signature	Date 4-3-20
	Senior Accountable Person	Emma Hatch
	Diversity & Inclusion Team Representative	Frances McAndrew
FEMcAndrew	4-3-20	
Signature	Date	

