



## **Contents**

| Why is GESI a consideration for UK PACT?                            | 01 |
|---|----|
| Key definitions   | 02 |
| More on Do-No-Harm  |    |
| GESI ambition and levels of GESI mainstreaming                      | 05 |
| More on GESI Transformative Change                                  | 06 |
| GESI mainstreaming in climate and energy projects                   | 07 |
| UK PACT's approach to GESI mainstreaming and Do-No-Harm             | 08 |
| How to support meaningful participation from targeted beneficiaries | 09 |
| Programme accountability  | 11 |
| Additional resources  | 12 |



# Why is GESI a consideration for UK PACT?<sup>1</sup>

The UK PACT's primary objectives are to reduce emissions and, by so doing, support the reduction of poverty. To achieve these objectives, the programme outcomes should be inclusive and equitable. It is essential that Gender Equality and Social Inclusion (GESI) considerations are ambitious and mainstreamed throughout UK PACT.

The legislative underpinning for GESI arises principally from the International Development (Gender Equality) Act of 2014 (ID(GE)A), which mandates that all UK Official Development Assistance (ODA) programmes must have regard to reducing gender inequality. This means that all ODA programmes must actively consider the likely effect of interventions in reducing gender inequality at all stages of the programme cycle.

The **public sector equality duty**, created under the **Equality Act 2010**, requires public bodies to have due regard to the need to eliminate discrimination. This includes advancing equality of opportunity and fostering good relations between different groups with protected characteristics\* and others in society before implementing a policy.

In 2015 the UK Government committed to achieving the UN's **Sustainable Development Goals** (SDGs), which explicitly endorse gender equality and reducing inequalities.<sup>2</sup>

Over the course of 2021-2025, all BEIS ICF programmes will, where relevant, seek to increase ambition on inclusion and gender equality and shift the approach from minimum compliance towards empowerment and transformation. This will include committing to gender mainstreaming across our portfolio to help identify and progress opportunities to advance Gender Equality in development, ensuring women and girls are provided with equal opportunities to men and boys.

GESI forms an important element of all UK PACT programming and forms a key part of evaluation for Green Recovery Challenge Fund (GRCF), through dedicated questions in the EoI and full proposals application forms and dedicated guidance included in the FAQs. More broadly, inclusion of GESI considerations is expected to be demonstrated throughout the project approach, design, and project cycle. This is reflected in various sections of the application form (e.g. among others, team diversity, budget, stakeholder's engagement).

Similarly, GESI is a core element to be considered during project implementation across all programmes.

#### Who is this guide for?

This guide is for all implementing partners funded by UK PACT programmes, namely Country Programmes and Green Recovery Challenge Fund project implementers, and Skill-Shares and Secondments experts.

#### Why is it important?

The guide will help you understand how to consider and suitably integrate GESI principles in your project design and implementation. This applies to a new UK PACT funded project or an extension of a previously funded project.

#### When should I use this guide?

We recommend that you use this guide on an ongoing basis during project design, implementation and in monitoring and evaluation at the end of your project.

<sup>&</sup>lt;sup>1</sup>Please also refer to the UK PACT GESI Ambition Statement

<sup>&</sup>lt;sup>2</sup>SDG 5: Achieve gender equality and empower all women and girls, <a href="https://sdgs.un.org/goals/goal5">https://sdgs.un.org/goals/goal5</a>. SDG 10: Reduce inequality within and among countries, <a href="https://sdgs.un.org/goals/goal10">https://sdgs.un.org/goals/goal10</a>

<sup>\*</sup>Protected characteristics include age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.



## **Key definitions**

| Term  | Definition  |  |
|---|---|--|
| Sex   | Sex describes the biological, anatomical and physiological differences (e.g. differences in reproductive functions) of a species. In humans, this traditionally refers to the male/female binary.   |  |
| Gender  | Unlike sex, gender is not a biological determinant, but rather socially constructed differences between males and females, which include (but are not limited to): rights, entitlements, and obligations. The way in which a society defines gender determines the roles, behaviours, activities, and attributes that a given society at a given time considers appropriate for men and women.  |  |
| Gender equality   | The absence of any discrimination based on gender, with equal rights, responsibilities, and opportunities for everyone, without distinction depending on their gender. This means transforming the distribution of opportunities, choices, and resources available to women and non-binary people so that they have equal power to shape their lives and participate in the process thereby increasing equality between people of all genders. This means that rights, responsibilities, and opportunities will not depend on the gender society attributes to each person. It means ensuring that everyone has equal access to socially, economically, and politically valued goods, resources, opportunities, benefits, and services.   |  |
| Social exclusion  | Social exclusion occurs when certain groups are systematically disadvantaged based on social characteristics, such as gender, sexual orientation, age, disability, ethnicity, caste, migrant status, type of household (e.g. one-person household, single parent), the level of education and literacy, employment status, or housing status. This results in different social, political, and economic inequalities and can result in individuals being discriminated against and denied recognition and resources.  |  |
| Social inclusion  | Refers to the process of improving the terms for individuals and groups to take part in society, and the process of improving the ability, opportunity and dignity of people disadvantaged on the basis of their identity to take part in society. It is essentially making the 'rules of the game' fairer where there are imbalances.  |  |
| Gender Equality<br>and Social Inclusion<br>(GESI) mainstreaming | The process of assessing the implications for everyone (people of all gender identities, sexual and gender minorities (SGM), as well as any excluded groups, on the basis of any factor) of any planned action, including policies or programmes, in all areas and at all levels.  It is a way to make women's, as well as men's, and excluded groups' concerns, and experiences an integral dimension of the design, implementation, monitoring and evaluation of policies and programmes in all political, economic, and societal spheres so that everyone benefits equally, and inequality is not perpetuated. GESI mainstreaming contributes to more responsive programming and better service provision, because it considers the interests and needs of all relevant groups. Everyone's inputs are necessary if communities are to prosper, and equality and inclusion are essential elements of sustainable development. |  |



## **Key definitions**

| Term              | Definition  |  |
|-------------------|---|--|
| Intersectionality | Put simply, intersectionality is the concept that all oppression is linked. More explicitly, the Oxford Dictionary defines intersectionality as "the interconnected nature of social categorisations such as race, class, and gender, regarded as creating overlapping and interdependent systems of discrimination or disadvantage". Intersectionality is the acknowledgement that everyone has their own unique experiences of discrimination and oppression and we must consider everything and anything that can marginalise people – gender, race, class, sexual orientation, physical ability, etc. It is important to recognise that gender, age, ethnicity, socioeconomic status, and any other categories of social difference have complex relationships with one another and have interdependent advantages and disadvantages. It is not possible to address gender without also addressing inclusion. |  |
| Do-No-Harm        | A principle recognising that no action is neutral and, in the context of GESI, that paying no specific attention to gender and inclusion does not make these interventions 'gender- or discrimination-neutral'; rather, they may actually reinforce the status quo or even advance inequality and exclusion. Do-No-Harm (DNH) is a framework which was devised to help humanitarian personnel apply conflict sensitivity to their programming, especially in conflict and post-conflict settings. However, DNH approaches are helpful in any context, to assist in preventing harm and increasing positive impact on those that development projects are trying to benefit, with a specific focus on the most vulnerable communities and wider society.   |  |



UK PACT understands gender equality and inclusion as distinct but overlapping concepts. For some groups, exclusion is based on gender while for others, it is based on other factors, such as those outlined above. However, for most people, exclusion is based on several factors across both dimensions, which shift in the context of diverse relationships and institutional settings. This is what is generally referred to as "intersectionality." Therefore, it is not possible to address gender without also addressing inclusion, and it is important for all projects to look at both elements in conjunction.

### More on Do-No-Harm

When we intervene somewhere, we become a part of the dynamics and relationships in that place, whether through investing resources or simply by being there. The basis of Do-No-Harm (DNH) is to ensure careful consideration is given so – at a minimum – no harm is done, intentionally or unintentionally. DNH does not mean avoiding all kinds of conflict or harm at all costs, but rather that we have the responsibility of understanding the context in which we work and how our presence and action interact with the wider environment. The challenge set by DNH is that we understand the potential benefits and harms that our interventions may cause and take steps to mitigate the latter<sup>3</sup>.

DNH is to be applied at all stages of the project lifecycle, right from needs assessment and design, through to inception, implementation and monitoring and evaluation. In very practical terms, all projects are expected to understand their context (especially thinking of GESI implications), how the proposed intervention interacts with the context, and use this understanding to avoid negative impacts and maximise positive ones.

Girls' Education Challenge: Do-No-Harm Policy: https://assets.publishing.service.gov.uk/ government/uploads/system/uploads/attachment\_ data/file/573785/GEC-Do-No-Harm-Policy.pdf



# GESI ambition and levels of GESI mainstreaming

UK PACT applies different levels to evaluate how GESI considerations have been mainstreamed into projects and to set its GESI impact ambition. These are listed and defined below in Figure 1. Project implementers must meet Level 1 – Minimum

compliance, and should strive for Level 2 – Empowerment. Project implementers should also try to identify opportunities and promote activities relating to Level 3 – Transformation wherever possible to set the stage for sustainable societal change in the future.

#### Figure 1 The levels of GESI mainstreaming

evel 0:

Non-compliance

GESI unaware/blind

Project fails to identify different needs and impact for women and marginalised groups. If no specific attention is given to GESI, it is easy for any intervention to be unintendedly reinforcing existing discriminatory practices and/or perpetuating inequality.



evel 1:

Minimum compliance Voice

Project addresses basic needs and vulnerabilities of women and marginalised groups. These groups can voice their needs and concerns, which are listened to and addressed in the context of the project.



Projects should aim for empowerment

Level 2:

Empowerment Choice

Project builds assets, capabilities and opportunities for women and marginalised groups. Women and marginalised groups can make their own choices in the context of the project and are able to contribute to the decisions that concern them directly, including in project implementation.



Level 3:

Transformation Control

Project addresses unequal power relations and seek institutional and societal change. Women and marginalised groups have active control over resources and decisions in the context of the project.

Whilst the ambition for UK PACT is to at least empower girls, women, and marginalised groups, it is understandable that not all projects will reach GESI empowerment level. However, there is a clear expectation that all UK PACT projects must show clearly how they are building GESI into their programming, aiming to achieve the highest level on the above scale that is possible within their project concept.<sup>4</sup>

Delivering a truly empowering or transformative outcome may be more challenging for some interventions across the portfolio than others, but implementing partners are expected to provide strong evidence to demonstrate where this is the case, and to commit to reviewing whether their GESI outcomes could be improved at appropriate intervals throughout the programme cycle.<sup>5</sup>



### More on GESI Transformative Change

It is difficult and not possible to fully address social norms during the project timeframe of 12 months or less. However, effective GESI mainstreaming within your projects can still provide the basis for Transformative Change in the long term.

GESI Transformative Change is defined as the transformation of unequal power relations (e.g. between men and women) through change in roles, status, and the redistribution of resources. Gender transformative programming aims to explicitly transform unequal gender power relations by addressing the root causes of gender inequality and promoting the value of women and girls. This type of programming goes beyond improving the condition of women and girls, instead seeking to improve their social position by working across several levels at the same time.<sup>6</sup>

In climate-related projects, Transformative Change means shifting research away from solely accommodating change to instead "contesting the underlying social, political and economic structures that produce marginalisation and inequality". GESI transformative adaptation takes this a step further by aiming to create opportunities for individuals to actively challenge existing gender norms, promote positions of social and political influence for women and marginalised groups, and address power inequalities between persons of different genders. This can be achieved by addressing "women's agency (capacities, skills, confidence), the relationships of power that affect their choices (particularly household relationships and community groups), and the structures (such as agriculture and market institutions, land policies, social norms) that govern their lives and choices".8

UK PACT projects can address factors that lay the groundwork for future transformation. This involves addressing the four forms of power that contribute to Transformative Change, including i) power over (control over people and resources); ii) power to (act with agency based on skills and capacity); iii) power within (sense of self-worth and awareness); iv) power with (ability to collaborate). There are practical steps project implementers can take to better consider their programming considering these forms of power that can kickstart the process of Transformative Change. In order to understand the process of empowerment, we therefore need to be aware that power can take many different forms:

- Power over: 'controlling power, which may be responded to with compliance, resistance (which weakens processes of victimisation) or manipulation'
- Power to: 'generative or productive power (sometimes incorporating or manifesting as forms of resistance or manipulation) which creates new possibilities and actions without domination'
- Power with: 'a sense of the whole being greater than the sum of the individuals, especially when a group tackles problems together'
- Power from within: 'the spiritual strength and uniqueness that
  resides in each one of us and makes us truly human. Its basis
  is self-acceptance and self-respect which extend, in turn, to
  respect for and acceptance of others as equals.'9

Some example activities related to each form of power to support Transformative Change are as follows:<sup>10</sup>

#### **Power Over Power Within Power With** Power To a. Increase access to land a. Target women and a. Demonstrate to women a. Engage women and and energy resources marginalised groups with and marginalised groups marginalised groups to for women and capacity building and that you have analysed the participate in design and marginalised groups. upskilling efforts. impact of your project on implementation along with all central stakeholders. them and have incorporated b. Provide women and b. Involve women and their feedback—that their marginalised groups marginalised groups as b. Implement the project with experiences and situations with control over aspects core project team members. a diverse team incorporating are fully recognised (i.e. of programming in the major stakeholders, women, workshop, roundtable, etc.).

design and decision-

making process.

8lbid

and members of marginalised

communities.

<sup>&</sup>lt;sup>4</sup>As per the UK PACT GESI Ambition Statement

<sup>&</sup>lt;sup>5</sup>Please refer to the UK PACT GESI Ambition Statement

<sup>&</sup>lt;sup>6</sup>Plan International Canada, <a href="https://www.communityledtotalsanitation.org/">https://www.communityledtotalsanitation.org/</a> sites/communityledtotalsanitation.org/files/EmrulHasan.pdf

<sup>&</sup>lt;sup>7</sup>Care International, <a href="https://insights.careinternational.org.uk/">https://insights.careinternational.org.uk/</a> media/k2/attachments/CARE\_Gender-Transformative-Adaptation\_2019.pdf

<sup>&</sup>lt;sup>9</sup>Joanna Rowlands 1997, Questioning Empowerment Working with Women in Honduras, Oxfam (UK and Ireland), Oxford.

¹ºCare USA, https://www.care.org/wp-content/uploads/2020/05/working\_paper\_aas\_gt\_change\_measurement\_fa\_lowres.pdf



### GESI mainstreaming in climate projects

GESI mainstreaming can take a variety of forms. In climate-related projects this should include:

- Integrating gender and inclusion into the design, implementation and monitoring of climate projects and programmes;
- Systematically taking women's and marginalised groups' differentiated needs, knowledge, experiences, and priorities into account in all climate responses.

Ensuring women's and marginalised groups' meaningful participation, access to and influence over decision-making on climate change at all levels, ensuring that the challenges they are facing can be addressed and the barriers removed.

#### Common challenges for women and marginalised groups in climate and energy

- Lack of decision-making power at the household, local, and government levels
- Lack of rights to, access to, and control over crucial resources (i.e. land, finances, etc.)
- Discrimination resulting from embedded gender and social norms
- Lack of economic power caused by limited access to economic opportunities, higher participation in the informal sector, and unequal wages
- High levels of time poverty due to responsibility for household work and childcare

- Disproportionately higher risk for poor health outcomes (i.e. indoor pollution from cookstoves, climate-related food insecurity, etc.)
- Disproportionate risk of death or injury in the context of natural disasters and climate change
- Limited/inadequate access to basic services i.e. electricity, sewerage, transportation, internet, and water resources among others
- Different citizenship rights and associated poor access to social support services addressing climate risk and protections



# How to embed GESI mainstreaming and Do-No-Harm in project delivery

UK PACT has designed various steps and tools to support its project implementers to ensure GESI is effectively mainstreamed throughout the project cycle.

Figure 2 Project cycle for ensuring effective GESI mainstreaming



At the project outset, to meaningfully mainstream GESI and DNH, project implementers are expected to consider the GESI context of their project and assess how their interventions interact with that context, taking steps to prevent harm and maximise positive impact.

#### Throughout project implementation, they are responsible for:

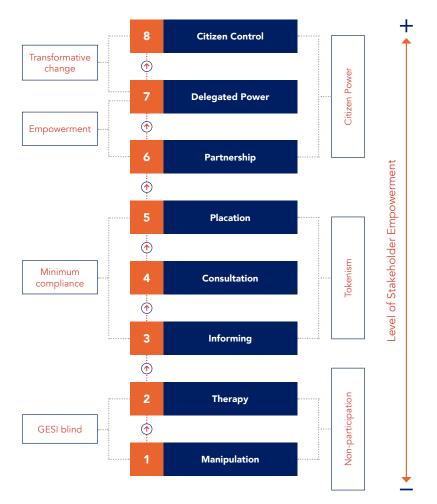
- Continuously reflecting on how their interventions may cause unintended negative effects and taking immediate steps to mitigate these;
- Engaging communities/target beneficiaries in every stage
  of the programme, and to the extent possible building
  their capacity as decision-makers through specific activities;
- Implementing accountability and complaints mechanisms throughout project and organisational structures, creating a safe space for feedback from beneficiaries and stakeholders to be incorporated into future project planning;
- Continuously monitoring progress, establishing strong accountable monitoring and evaluation processes to support GESI commitments, appropriate disaggregation of data, and collation of case studies and stories.



## How to support meaningful participation from targeted beneficiaries

According to the World Health Organization, "meaningful participation requires that individuals are entitled to participate in the decisions that directly affect them, including in the design, implementation, and monitoring of health interventions". This participation can occur in a variety of forms, as laid out in Figure 3.

Figure 3 The Ladder of Citizen Participation<sup>12</sup>



UK PACT expects its project implementers to carefully explore participation methods to ensure that targeted GESI groups are meaningfully engaged in activities' design and implementation. Additional guidance and resources on how to achieve meaningful participation are provided below.

Participation can generally be categorised into four main forms: nominal, instrumental, representative, and transformative:<sup>13</sup>

- Nominal participation is often used by more powerful actors to give legitimacy to development plans. Less powerful people become involved in it through a desire for inclusion. But it is little more than a display and does not result in change.
- Instrumental participation sees community participation being used as a means towards a stated end — often the efficient use of the skills and knowledge of community members in project implementation.
- Representative participation involves giving community members a voice in the decision-making and implementation process of projects or policies that affect them. For the more powerful, representative participation increases the chances of their intervention being sustainable; for the less powerful, it may offer a chance for leverage.
- Transformative participation results in the empowerment of those involved, and as a result alters the structures and institutions that lead to marginalisation and exclusion.

<sup>&</sup>quot;World Health Organization, https://www.who.int/gender-equity-rights/understanding/participation-definition/en/#:~:text=Meaningful%20participation%20 requires%20that%20individuals,and%20monitoring%20of%20health%20interventions.

<sup>12</sup> Revisited from Arnstein, S. (1969) 'A ladder of citizen participation', Journal of the American Institute of Planners 35.4: 216–224

<sup>&</sup>lt;sup>13</sup>Participatory Methods, https://www.participatorymethods.org/method/levels-participation



Project implementers under the UK PACT are expected to reach minimum compliance at a minimum, but aim for representative participation and opportunities for transformative participation, hence at "rung" 6 and above on the ladder of citizen participation (see figure 3).

Project implementers should not only provide information to stakeholders, but look at stakeholders' engagement as a dynamic and ongoing process, which can involve more than one form of participation and bring about empowerment and transformation.<sup>14</sup>

#### Consider the Voice, Empowerment and Accountability (VEA) approach

Voice, empowerment, and accountability (VEA) is an umbrella term that covers a wide range of ideas about how citizens can express their preferences, secure their rights, make demands, and achieve better development outcomes. This can lead to changes in policy, regulation, and reform, as well as improved transparency, reduced corruption, increased community participation and improved government responsiveness to citizen demands. VEA draws attention to the role of individual agency, power relations, and processes that can enable or constrain people's capacity to articulate and achieve their individual and collective goals.<sup>15</sup>

**Voice** is often understood as the ability of citizens to express their preferences and to be heard by the state, either through formal or informal channels, in written or oral form. Citizens' voices are not homogenous, and sometimes more powerful voices and opinions can crowd out those of excluded or marginal groups.

**Empowerment** is a process through which individuals or organised groups increase their power and autonomy to achieve certain outcomes they need and desire. Empowerment focuses on supporting disadvantaged people to gain power and exert greater influence over those who control access to key resources.

**Accountability** is a process for holding individual actors or organisations to account for their actions. Accountability requires transparency, answerability, and enforceability between decision-makers and citizens.<sup>16</sup>

It is only by supporting real accountability and giving all relevant stakeholders a voice, that we can move up along the ladder to support meaningful empowerment, and in the longer term reach Transformative Change.

<sup>14</sup>How to support stakeholders' empowerment https://inclusiveinfra.gihub.org/action-areas/stakeholderidentification-engagement-and-empowerment/#text-ref-25

<sup>&</sup>lt;sup>15</sup>Combaz & Mcloughlin, 2014, Voice, Empowerment and Accountability: Topic Guide.

<sup>16</sup>GSDRC (2014), Voice, Empowerment and Accountability, Topic Guide

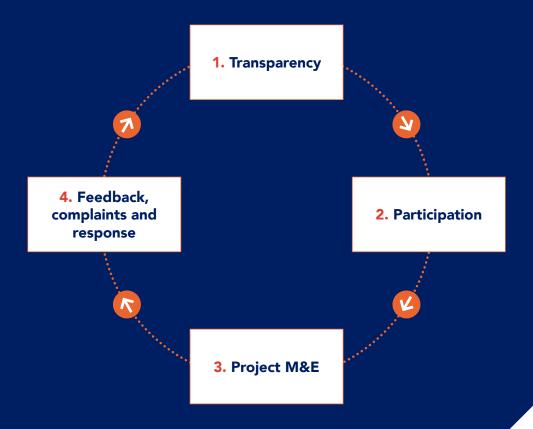


## Programme accountability

Programme accountability mechanisms are crucial to ensuring GESI concerns and participatory engagement remain a priority. These four tenets of programme accountability should be embedded within project delivery (Figure 5).

- 1. Giving clear and relevant information so it is presented appropriately to the community.
- 2. Enabling all relevant stakeholders (especially those generally excluded, vulnerable or marginalised in the project's context) to play an active role in the decision-making process and activities that affect them.
- 3. Monitoring and reviewing progress against goals and targets with the input from stakeholders.
- 4. Integrating learning into future decision making and learning from similar projects and best practices.

Figure 5 Accountability within the project cycle





## Additional resources

#### **General toolkits**

- Asian Development Bank: ToolKit on Gender Equality Results and Indicators
- World Bank: Integrating Gender into IEG Evaluation Work
- UN Women: RESPECT Women: Preventing violence against women – Implementation package\*

\*Note: This package has a specific design and implementation checklist not specifically related to violence against women that can be reflected in your GESI assessments/action plans (especially consider strategy summaries related to empowerment of women; poverty reduction; and environments made safe).

#### Do-No-Harm

- CDA: Do-No-Harm: A Brief Introduction from CDA
- CDA: The "Do-No-Harm" Framework for Analysing the Impact of Assistance on Conflict: A Handbook
- CDA: Do-No-Harm in Land Tenure and Property Rights:
   Designing and Implementing Conflict Sensitive Land Programs
- FCDO (formerly DFID): Working Effectively in Conflict-affected and Fragile Situations
- OECD: Do-No-Harm—International Support for Statebuilding (pp. 111-118)
- FCDO (formerly DFID): Addressing Violence against Women and Girls in Education Programming

#### **Empowerment and Transformative Change**

- UN: Goal 5: Achieve gender equality and empower all women and girls
- Care International: Measuring gender-Transformative Change
- Plan International: Introducing the gender transformative marker
- Plan International Canada: Architecture for Gender Transformative Programming and Measurement: A Primer
- Care International: Gender Transformative Adaptation
  - From Good Practice to Better Policy

#### Covid-19

- EIGE: Covid-19 and gender equality
- Gender and the Economy: Primer on the gendered impacts of COVID-19
- The impact of COVID-19 on gender equality
- COVID-19 and gender equality: Countering the regressive effects
- Gender and Energy at centre stage in COVID-19 battle: Powering a more gender equal recovery

#### **Gender and Greening Finance**

- IIED: Money where it matters: designing funds for the frontier
- IIED: Calling for business unusual: mechanisms for delivering change
- OECD: Making climate finance work for women: Overview of bilateral ODA to gender and climate change
- ADB: Building Gender into Climate Finance: ADB Experience with the Climate Investment Funds

#### **Gender and Transport**

- Asian Development Bank: Gender Tool Kit: Transport
- World Bank: Guidelines to Mainstream Gender in Transport Projects
- TUMI: Approaches for Gender Responsive Urban Mobility
- UN Habitat: Gender and Sustainable Urban Mobility

#### **Gender and Clean Energy**

- IEA: Tracking gender and the clean energy transition
- World Bank: Gender and Energy Access: Household Energy and Rural Electrification
- IEA: Energy and gender—A critical issue in energy sector employment and energy access
- ESMAP: Rethinking Power Sector Reform in the Developing World
- CIF: Gender and Renewable Energy: Entry Points for Women's Livelihoods and Employment
- ENERGIA: Mainstreaming Gender in Energy Projects
- ENERGIA: Gender in the transition to sustainable energy for all: From evidence to inclusive policies

#### **Gender and Agroforestry**

- CGIAR: Gender and Inclusion Toolbox: Participatory Research in Climate Change and Agriculture
- FAO: How to mainstream gender in forestry
   A practical field guide
- World Agroforestry Centre: A Guide for Gender Mainstreaming in Agroforestry Research and Development
- CIF: Gender and Sustainable Forest Management: Entry Points For Design And Implementation
- IUCN & WEDO: Forests and Gender

| Document title          | UK PACT – Guidance on Gender Equality and Social Inclusion (GESI) |
|-------------------------|---|
| Date                    | April 2021  |
| Document version number | Version 1.0   |

ICF has used reasonable skill and care in checking the accuracy and completeness of information supplied by the client or third parties in the course of this project under which the report was produced. ICF is however unable to warrant either the accuracy or completeness of such information supplied by the client or third parties, nor that it is fit for any purpose. ICF does not accept responsibility for any legal, commercial or other consequences that may arise directly or indirectly as a result of the use by ICF of inaccurate or incomplete information supplied by the client or third parties in the course of this project or its inclusion in this project or its inclusion in this report. This report is the copyright of the Department for Business, Energy and Industrial Strategy (BEIS) and has been prepared by ICF Consulting Services Ltd under contract to BEIS. The contents of this report may not be reproduced in whole or in part, nor passed to any other organisation or person without the specific prior written permission of BEIS.

