



Report title

The Draft Fifth London Safety Plan 2013-2016

Meeting

Date

Authority

22 November 2012

Report by

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Commissioner

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Summary

The London Safety Plan is the Authority's Integrated Risk Management Plan (IRMP) – as required by the Government's national framework for the fire and rescue service – and is also the Authority's corporate plan. This first draft of the Plan is presented to the Authority to allow an early discussion on content, and will also be used for some initial (pre-consultation) engagement work with London borough councils, with other organisational stakeholders and with staff. As outlined in the report, the Plan will not enter into a formal consultation phase until after its consideration at the January meeting of the Authority.

A final Plan is not expected to be available for approval, alongside the results of consultation, until June 2013 when the Authority will be invited to agree a final version. This report, therefore, also seeks approval to the extension of the Fourth London Safety Plan until such time as the Fifth London Safety Plan is approved.

Recommendation(s)

That the Authority:

1. approves this initial draft Fifth London Safety Plan 2013-2016 (LSP5) for early engagement with stakeholder organisations and with staff;
2. directs the Strategy Committee to commence work with immediate effect on developing the proposed improvements to the programme of youth activities as set out on page 11 of LSP5;
3. provides officers with their views about the draft plan;
4. extends application of the Fourth London Safety Plan (LSP4) until LSP5 is approved; and

5. authorises the Deputy Commissioner to make any editing and stylistic changes which may be required to the Draft Plan prior to engagement and/or to facilitate design and production.

Introduction/Background

6. The London Safety Plan is the Authority's Integrated Risk Management Plan (IRMP) – as required by the government's national framework for the fire and rescue service – and is also the Authority's corporate plan. This report explains the background to the production of LSP5, the specific proposals included in the draft Plan, the timetable for agreeing the Plan and for public consultation, as well as information on the key headline targets for the period covered by the Plan.
7. The requirement to produce an IRMP started in 2004/05. Since then, the Authority has produced four London Safety Plans, supported by an annual action plan for each intervening year. In March 2009, it was agreed that the London Safety Plan should also incorporate the Authority's corporate plan, and the LSP continues to also serve that purpose.
8. The Authority approved its current (Fourth) London Safety Plan (LSP4) in March 2010, covering the period 2010-2013 and in March 2012, the former Performance Management Committee agreed the LSP Action Plan for 2012/13 which covers the final year of LSP4.

Statutory background

9. The Fire & Rescue Services Act 2004 (FRSA), among other things, requires the Secretary of State to publish a national framework for the fire and rescue service, and to review and update that framework regularly. The national framework sets out the government's expectation for the service and the Authority must *'have regard'* to its contents when planning and delivering its services. Further, the Secretary of State has the power to intervene where he considers that the Authority is failing, or is likely to fail, to act in accordance with the framework. A report about the government's consultation on a draft intervention protocol is before the Authority at this meeting today.
10. The Government published a revised national framework in July 2012 (following consultation). Unlike previous frameworks, no specific time period of currency is stated. The priorities in the new national framework are for fire and rescue authorities to:
 - identify and assess the full range of foreseeable fire and rescue related risks their areas face, make provision for prevention and protection activities and respond to incidents appropriately.
 - work in partnership with their communities and a wide range of partners locally and nationally to deliver their service.
 - be accountable to communities for the service they provide.
11. In particular, the framework says that *"Each fire and rescue authority must produce an integrated risk management plan that identifies and assesses all foreseeable fire and rescue related risks that could affect its community, including those of a cross-border, multi-authority and/or national nature. The plan must have regard to the Community Risk Registers produced by Local Resilience Forums and any other local risk analyses as appropriate."* The complete 'integrated risk management plan requirement' set out in an annex to the framework is set out in Appendix A to this report.

Timetable for approval of the Plan

12. The timetable for consideration of the London Safety Plan by the Authority is as follows:

22 November 2012	Approval of draft LSP5 for initial engagement with other public bodies (and a provision to ensure that the life of the current LSP is extended to provide for the period from 1 April until approval of a new LSP).
15 January 2013 (provisionally)	Approval of public consultation in respect of the complete LSP5.
20 June 2013	Outcome of consultation and approval of LSP5.

Development of the draft LSP5

13. The Draft Plan which accompanies this report has been developed in a collaborative way including, since July 2012, presentations, the sharing of early drafts, and key policy development papers, with:

- Leading Members (the Chairman, Councillor Shah, and Councillor Stacy) via an informal LSP5 discussion forum which has had five meetings to date; and
- Brigade trades unions via the Authority Joint Council (AJC); the trades unions have been given access to key papers shared with the Members' discussion forum and have met twice (so far) to consider LSP5 matters; further meetings are planned.

14. Alongside this, Brigade officers have engaged in a series of meetings with (a) internal subject experts to develop Plan content and priorities going forward; and (b) with station-based staff. Eleven briefings had been held with groups of station-based staff (as at 14 November) and a further two are planned before the end of the year. These briefings are carried out by the Commissioner, Deputy Commissioner, Director of Operational Resilience and Training, and the Third Officer. The briefings have audiences of up to sixty members of staff and cover a range of topical issues, including LSP5. The briefings provide staff with an opportunity to speak to senior management, ask open questions about LSP5 and other subjects, and to express their views about matters they would like to be addressed in the future.
15. In addition, 33 station watch-based staff sessions have now been conducted by the Head of Strategy & Performance (and her staff) and one held at Control. Three more have been planned for November, including a second one at Control. A further three are planned for December. The questions raised at these sessions have continued to focus on the process for developing LSP5 and the budget, although other topics come up too. The sessions remain universally welcomed by watch-based staff, who have expressed a desire for more interaction with senior managers.
16. Throughout October and November 2012, the Commissioner and Deputy Commissioner have held meetings with senior officers from partner organisations to inform them about the development of the new LSP and to discuss potential impacts and items of shared interest. These included the Metropolitan Police (9 October), Association of British Insurers (16 October), and London Councils (23 October). At these meetings there has been broad support for proposals such as charging for attending false alarms from unwanted fire signals and for a returned focus to Brigade support for activity on road safety. As proposals are developed and public consultation commences, contact with these senior officers will continue. The Chairman and Commissioner met the London Councils Leaders Committee on 13 November to formally

introduce to local authority leaders the LSP5 ideas that are being considered and the consultation timetable.

Format of the draft LSP5

17. The Plan needs to be suitable for consultation purposes (having regard to the content) but it also needs to maximise audience engagement with the key messages. To this end, a shorter, more concise Plan has been produced compared to previous versions. The Plan will guide the actions of the Authority over the three year period and has continued currency beyond final approval for use with stakeholders, the wider public and with staff as the document that explains the Authority's key priorities, and aims and objectives. The Plan will have an action plan which can be readily updated annually so that the whole plan remains 'live' for its life span.
18. A range of information (e.g. What we know about risk, comparative performance with other brigades, etc.) to support the Plan has traditionally been included in the Plan itself. It is intended that this information will continue to be available linked to Plan, but on the external web site.

Content of the draft LSP5

19. The new draft Fifth London Safety Plan (LSP5) is designed to carry forward the Authority's continuing commitment to improving the safety of people who live, visit or work in London; to achieving a professionally focused and supported fire and rescue service in London and to the need to achieve value for money in everything that we do. It is attached as Appendix B.
20. Whilst we remain committed to our long term vision set in March 2006 to *'To be a world class fire and rescue service for London, Londoners and visitors'*, and to our six strategic aims (prevention protection, response, resources, people and principles), we have taken the opportunity to structure the draft LSP5 around some cross-cutting themes which we hope will make the Plan easier to understand for Londoners and for key stakeholders. These themes are
 - Building relationships
 - Changing behaviours
 - Responding effectively
 - Using our powers
21. The Plan underlines the Authority's continuing main commitments to:
 - promote community safety and fire prevention activity to mitigate the risk on communities in London, including work to build influential relationships and productive partnerships.
 - use our powers and our understanding of risk, to make sure that buildings in London conform to the appropriate fire safety standards in order to protect Londoners and visitors to London.
 - get resources to emergency incidents as quickly as possible, maintaining and improving where possible, our performance against our standards of attendance for 1st and 2nd appliances.
 - deliver services in a cost effective way.
22. Alongside these broad over-arching themes in paragraph 21, some of the specific proposals in the draft Plan are:
 - train our firefighters to recognise, respond to and record instances of hoarding when visiting premises and when attending a fire.

- continue to work with a range of local partners to improve community safety within their respective areas. This will include being active members of Crime and Disorder Partnerships, and working with the London Safeguarding Adults Network and those who provide care to give guidance and advice on how to minimise the risk of death or injury from fire.
- continue to focus our prevention and protection activities on ensuring that older people living in care homes and in sheltered housing are as safe as possible.
- review our response to telecare emergency calls and work with telecare social alarm receiving centres to provide a more robust service for dealing with emergency calls and offer training and information on fire survival guidance for operators
- evaluate the effectiveness of our Home Fire Safety Visit programme to understand its impacts and to ensure that it continues to improve fire safety awareness, whilst reducing the opportunity for fires to occur.
- implement the recommendations arising from our evaluation of each of our youth work programmes and work to bring all our separate youth activities together under the successful LIFE brand so they deliver value for money and also represent a more coherent and integrated approach, better focussed on the Brigade's objectives and those of our partners. The Strategy Committee, at its meeting of 8 November, were keen to ensure that the momentum from the evaluations not be lost and are seeking to commence work immediately on developing these improvements to the youth work programmes.
- continue to work with premises owners who have persistent call outs due to AFAs to advise on how unwanted fire signals can be reduced and to introduce charging for 10 or more calls to false alarms due to AFAs in non-domestic premises in a 12 month rolling period.
- use social media to encourage behavioural change; to help Londoners protect themselves from fire and to help the London public avoid the travel and business continuity interruptions of fire.
- work with the government steering group on 'beds in sheds'.
- influence those responsible for designing buildings so that fire safety measures, such as sprinklers, are installed in buildings where the risk justifies it.
- work with architects, engineers and planners to enable the safe use of innovative design and new technology, supporting the development of effective engineered solutions which improve fire safety.
- identify ways in which the business community can easily access information on fire safety law and their regulatory responsibilities, as well as providing information on common trends, and issues on the cause, origin and spread of fire.
- work with the Boroughs and the Metropolitan Police to increase road safety awareness through education events highlighting the consequences of dangerous driving and demonstrating how we release people trapped in cars.
- Continue to take action to encourage effective lift management arrangements and to reduce unnecessary attendance by the Brigade.
- explore the possibility of charging for mutual assistance arrangements with neighbouring brigades under the provision of the Fire and Rescue Services Act 2004.

- recommend to the Mayor that there should be a 'powers, kit and capability' review across all emergency services working on the river, including exploring the potential for shared river cost and service provision.

23. As outlined earlier, a number of documents have been produced to support the Plan. These are:

1. Our aims, objectives, risks, commitments and targets
2. What we know about risk
3. Incident profiles
4. Historical data (1970 to 2011)
5. 2030 incident projections
6. Targeting those most at risk from fire
7. Management of calls to false alarms due to automatic fire alarms (AFAs) and detection equipment
8. Changes to the policy for the shut in lift releases
9. Getting to emergency incidents as quickly as possible
10. Working with neighbouring brigades
11. Station workloads, firefighter experience of incidents and pumping appliance utilisation (in preparation)
12. How we do response time modelling and modelling validation
13. Charges for attendance of appliances at incidents
14. Three year headline targets 2013 to 2016
15. Fire Service performance comparisons
16. Polling results/public attitude research
17. Operational efficiency work in progress

24. A detailed annual action plan for 2013/14 will be prepared following consultation, and annually thereafter. Current arrangements are that the Strategy Committee monitor performance against the Plan on a quarterly basis.

Operational service considerations

25. Members will be aware that officers have been working on potential changes to the way in which the Brigade responds to emergency incidents, including the numbers of fire stations and pumping appliances. That work is not complete. At this time, it is highly competent in addressing the response time impacts of a range of scenarios, but it does not take into account a range of other relevant considerations, nor my overarching professional judgement about the changes in deployment that would be acceptable. The work anticipates that the Brigade will have diminished financial resources in the future, but it also responds to the fact of significantly diminished demand on the Brigade's services, with substantially reduced numbers of calls received and incidents attended over the last ten years. Illustrations of potential changes to meet different budget savings targets have been prepared and this work has been shared with leading Members (via the informal LSP5 discussion forum mentioned above) and with the trade unions. Some of that work has found itself in the public domain (and now forms one of the supporting documents to the draft Plan).

26. The current version of the draft Plan does not include any detailed or specific proposals for changes to the number of fire stations nor to the number and location of pumping appliances. Any such proposals will continue to be developed and refined, and will be reported as necessary to the Authority in January 2013 alongside confirmed financial savings targets. At that point, Members will be able to consider those proposals and will be asked to agree them for public consultation.

27. At this stage, the Plan describes the principles which would underpin how changes to fire stations and fire appliances will be developed. For the period until the January consideration, these principles can be shared with London borough councils and other stakeholder organisations as part of the proposed pre-consultation engagement activity.

Headline targets

28. One of the most important parts of the draft Plan is the proposal for new headline targets. Since 2000, the Authority has set longer term headline targets which are used to drive and measure key activities. In the past, headline targets covering five years have been set, but for LSP4 it was decided to set targets which covered the same period as the Plan (i.e. three years). It is proposed to continue that approach for LSP5.

29. Setting these long term targets is always a challenge; too lenient and they are achieved too quickly; too hard and they become an unachievable burden that disincentivises those working to achieve them and actual successes are overlooked. For the draft LSP5 we propose to continue to set long term targets with two components:

- Normal – the level of reduction we reasonably envisage we can achieve if we maintain our current focus with the resources we already have.
- Stretch – a more challenging stretch target which will require more managerial and planning innovation and more efficient delivery methods. Achieving the stretch targets will also involve being able to rely upon releasing additional capacity.

30. The headline targets, as described in the draft LSP5, are:

	Rationale	Target... by March 2016 ...
Fires in the home	Fires in the home cause more serious casualties (and fatalities) than any other incident type we attend. For that reason we will continue with our headline target for these types of fire.	<i>Reduce fires in the home by 2 per cent (without stretch) and 8 per cent with stretch.</i>
Home fire safety visits	We still believe that it is a good use of our firefighters' time to carry out home fire safety visits to give fire safety advice to people in their own homes about the risks they face, and to fit smoke alarms.	<i>By March 2016 to carry out a further 219,000 home fire safety visits; with 8 in 10 of those visits being targeted at those most at risk from fire.</i>
Fires in care homes and sheltered housing	We are concerned by the number of elderly people who are still harmed, or killed, by fire in places where they should be safe. For this reason we have a new headline target focusing on the fires that happen in care homes and sheltered housing for the elderly.	<i>To reduce fires in care homes and sheltered housing by 3 per cent (without stretch) and 9 per cent with stretch.</i>

	Rationale	Target... by March 2016 ...
Fires in non-domestic buildings	There are over 280,000 non-domestic buildings in London. The fire risk in these buildings is low (less than 1 per cent a year) because these buildings are covered by fire safety legislation. As awareness of the legislation requirements continue to improve, and we design more fire safety protection into new buildings and refurbishments, we would like these incidents to reduce further.	<i>To reduce fires in non-domestic buildings (where the RRO typically applies) by 4 per cent (without stretch) and 16 per cent with stretch.</i>
Fire related fire deaths	Fire deaths in London have been reducing steadily, but we would still like to see these numbers reduce further. As the annual number of fire deaths varies significantly each year, we will continue to measure our success using a ten year average.	<i>To reduce fire related fire deaths by 4 per cent (on the ten year average).</i>
Outdoor rubbish fires	Our previous headline target for fires involving outdoor rubbish and loose refuse focused on those that were started deliberately (or the cause was unknown). We have been very successful in that and have reduced these fires by over 60 per cent. Nevertheless, rubbish fires, however they start, are antisocial and have a negative affect on the local communities. So our target for rubbish fires will include all motives for the fire starting.	<i>To reduce all outdoor rubbish fires by 14 per cent (without stretch) and 28 per cent with stretch.</i>
False alarms from automatic fire alarm (AFA) systems in non-domestic buildings	Nearly half of the emergencies we attend turn out to be false alarms; and half of these come from automatic fire alarm (AFA) systems in non-domestic buildings. Fire alarms and fire detection systems are fundamental to providing early warning from fire, giving people the chance to evacuate safely. But to be effective, they must be properly installed and maintained so they don't activate when there is no fire.	<i>To reduce false alarms from automatic systems in non-domestic buildings by 9 per cent (without stretch) and 25 per cent with stretch.</i>
Shut-in-lift releases	We continue to attend a high number of non-emergency incidents where we release people from lift cars because the owners of the lift haven't provided adequate release arrangements. We have reduced these incidents by over 40 per cent since our last London Safety Plan, but we would still like to see further reductions.	<i>To reduce the shut-in-lift incidents we attend (to people not in distress) by 8 per cent (without stretch) and 19 per cent with stretch.</i>

Arrangements for engagement

31. In line with the timetable set out above, it is not proposed to start formal consultation on the draft LSP5 until the meeting of the Authority in January 2013. At this point there will be a full public consultation on the draft Plan which will provide stakeholders and the public with ample opportunity to respond to give their views on the plan and provide any detailed feedback. It will also allow time for full consideration of the views and feedback collected by the consultation during decision making on proposals in LSP5.
32. Approval of this initial early draft version of the Plan will enable some targeted pre-consultation engagement activity with London borough councils, staff and other key stakeholder organisations.
33. Officers would particularly value some preliminary feedback about some of the key questions which arise from the most contentious aspect of the plan, which is the approach to the provision of the response service. The questions which are of interest and which would enable officers to produce a final draft Plan in January that does the best it can to respond to views, include:
- Are the principles described in the Plan which underpin how changes to fire stations and fire appliances would be developed the right ones?
 - Should the current attendance targets be maintained, London-wide?
 - Should the Authority also examine ways to achieve the London-wide attendance targets at Borough level?
 - Is the identification of stations which should be prioritised for retention sensible?
 - Are the factors which officers have identified as justifying the retention of particular stations the right ones?
 - Is the use of more alternate crewing preferable to reducing pumping appliances?
 - Do you agree that cash efficiency is a relevant consideration in how emergency cover is organised (i.e. the fact that stations with 2 appliances are more cash efficient than stations with a single appliance)?
 - Is the overall approach to the fifth London Safety Plan satisfactory?
 - Do you feel that the exploration of risk (and the associated data) is adequate to support decision-making?

Extension of the Fourth London Safety Plan

34. As outlined above, approval of the final draft Plan for public consultation will not take place until mid January 2013. Allowing for an appropriate period of consultation will mean that LSP5 will not be ready for final approval by the Authority in March 2013. The target date for approval would be the Authority meeting in June 2013. On this basis, the Authority is asked to extend the Fourth London Safety Plan (LSP4) until LSP5 is approved.

Head of Legal and Democratic Services Comments

35. The production of a Safety Plan for London is a requirement of the National Framework issued by the Secretary of State under section 21 of the Fire and Rescue Services Act 2004. The framework requires the Authority to have integrated risk action plans which are to be the subject of formal consultation. Section 21(7) of the Act requires fire and rescue authorities to have regard to the Framework in carrying out their functions. In setting out its management strategy and risk based programme for enforcing the provisions of the Regulatory Reform (Fire Safety) Order 2005 within the Plan the Authority must also act in accordance with the Regulators Compliance Code and the Enforcement Concordat. The national framework also requires authorities to have effective business continuity arrangements in place in accordance with their duties under the Civil Contingencies Act 2004.

36. In preparing the plan the Authority must also consider its legal duties as set out in s149(1) Equalities Act 2010 which state that a public authority must, in the exercise of its functions, have due regard to the need to –

(a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act

(b) advance equality of opportunity between person who share a relevant protected characteristic and persons who do not share it

(c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Equalities Implications

37. A key strategic aim is to ensure that diversity runs through all our activities. The Plan represents an important public facing commitment to that aim and sets out our key performance improvement priorities, measures and targets in this area. Equality impact considerations have been part of the development of proposals in the Plan (where appropriate) and impact assessments are being completed to accompany the proposals in the Plan. An equality impact assessment will also be carried out on the version of the Plan that will be reported to Authority in January and published alongside it to inform the consultation.

Director of Finance and Contractual Services comments

38. There is a separate budget update on the agenda for this Authority meeting. That report notes that the Mayor has written to the Chairman to consult the Authority before preparing his draft component budget for LFEPA. The letter does not change the indicative funding figures for LFEPA for 2013/14 from those set out in the budget guidance and the Authority's savings target for next year therefore remains at £29.5m. However, the letter does recognise that there remains considerable uncertainty over the levels of funding to be announced in December and that there maybe a more favourable outcome than that assumed to date for LFEPA. The letter also acknowledges the amendment that the Authority agreed at its September meeting in which it asked the Mayor to reconsider his budget guidance. The letter states that in light of this the Mayor has decided to revise the requirements set out in the original budget guidance. As a result, the Authority is no longer required to provide a final budget submission by the 19 November 2012. It must, however, provide this in time for the Mayor to prepare his consolidated budget in January, after LFEPA's financial settlement for 2013/14 has become clear.

Environmental Implications

39. One of our strategic aims is to ensure that sustainability runs through all our activities. The Plan represents an important public facing commitment to that aim in the form of our new Sustainability Strategy, and sets out our key performance improvement priorities, measures and targets in this area. Furthermore, the community safety priorities, which focus on reducing the number of attendances at incidents, together with the review of 'pre-determined attendances', will potentially reduce the risks arising from unnecessary vehicle movements and reduce our carbon footprint. Separate sustainability impact assessments will be carried out, as appropriate, for the proposals in the Plan. A sustainability impact assessment will also be carried out on the final version of the Plan and published with the final Plan in June 2013.

Staff Side consultations undertaken

40. As outlined above, the Brigade's trades unions have been engaged with work to prepare the Plan, including the initial operational efficiency options/illustrations work that has been

undertaken. In particular, two meetings of the Authority Joint Council (AJC) have been held at which the Commissioner, Deputy Commissioner and Directors have personally presented material to the staff side.

41. It is proposed to commence staff side engagement on the Draft Plan following approval of this initial Draft Plan. The trade unions will also have an opportunity to consider any further proposals that are contained in the final draft Plan (to be approved in January 2013) alongside public consultation.

List of Appendices to this report:

1. Complete integrated risk management plan requirement (FRS national framework)
2. Draft Plan (together with the supporting documents)

LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985	
List of background documents	
<ol style="list-style-type: none">1. Fire and rescue national framework, July 2012 (Department for Communities & Local Government)2. IRMP guidance, Department for Communities and Local Government3. Fourth London Safety Plan 2010/2013	
Proper officer	Ron Dobson, Commissioner for Fire and Emergency Planning
Contact officer	David Wyatt
Telephone	020 8555 1200 ext. 30352
Email	david.wyatt@london-fire.gov.uk

Fire and rescue national framework for England

Complete integrated risk management plan requirement

For completeness, each integrated risk management plan requirement is repeated below.

Integrated risk management planning plays a key role in identifying, assessing and mitigating fire and rescue related risks.

Paragraph 1.3 in the FRS national framework

Each fire and rescue authority must produce an integrated risk management plan that identifies and assesses all foreseeable fire and rescue related risks that could affect its community, including those of a cross-border, multi-authority and/or national nature. The plan must have regard to the community risk registers produced by Local Resilience Forums and any other local risk analyses as appropriate.

Paragraph 1.10 in the FRS national framework

Each fire and rescue authority integrated risk management plan must:

- demonstrate how prevention, protection and response activities will best be used to mitigate the impact of risk on communities, through authorities working either individually or collectively, in a cost effective way
- set out its management strategy and risk based programme for enforcing the provisions of the Regulatory Reform (Fire Safety) Order 2005 in accordance with the principles of better regulation set out in the Statutory Code of Compliance for Regulators, and the Enforcement Concordat

Paragraph 1.11 in the FRS national framework

Fire and rescue authorities must make provision to respond to incidents such as fires, road traffic accidents and emergencies within their area and in other areas in line with their mutual aid agreements and reflect this in their integrated risk management plans.

Paragraph 2.3 in the FRS national framework

Each fire and rescue authority integrated risk management plan must:

- be easily accessible and publicly available
- reflect effective consultation throughout its development and at all review stages with the community, its workforce and representative bodies, and partners
- cover at least a three year time span and be reviewed and revised as often as it is necessary to ensure that fire and rescue authorities are able to deliver the requirements set out in this Framework
- reflect up to date risk analyses and the evaluation of service delivery outcomes

Paragraph 3.2 in the FRS national framework

Fire and rescue authorities must provide assurance on financial, governance and operational matters and show how they have had due regard to the expectations set out in their integrated risk management plan and the requirements included in this Framework. To provide assurance, fire and rescue authorities must publish an annual statement of assurance.