MD3051 Appendix 1

OUR PLAN TO KEEP LONDON SAFE

YOUR LONDON FIRE BRIGADE 2023-2029



Welcome to Your London Fire Brigade

We have worked in partnership with Londoners to create this plan and together we have found the risks communities may face and how the Brigade can help prevent incidents and protect you from danger.

If you would like a copy of this plan in another language or format, please get in touch consultation@london-fire.gov.uk

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Introducing our plan

London Fire Commissioner

Welcome to 'Your London Fire Brigade'.
I love London. I was born here and have lived and worked here most of my life. It is one of the world's most diverse cities and I am proud to call it home.

I have spent over 20 years in London Fire Brigade (LFB) and have been present at some of London's most significant tragedies – the Croydon tram crash, the Grenfell Tower fire, and the multiple terror attacks. In those moments I have witnessed great courage and professionalism from fellow firefighters, often in the face of unimaginable danger. I have also seen the unfailing strength of London's communities, your dignity and generosity, tolerance and kindness.

This is our first London plan since the tragic Grenfell Tower fire. It acknowledges that much has already changed in London Fire Brigade, but that we owe it to the bereaved and survivors, all Londoners and our staff to do much more. This plan has been written after many hours with Londoners, listening to you and learning from you. It sets out how we want to keep London safe and draws on all our experience.

This is what you told us.

- You told us that the failings that led to the Grenfell Tower fire mean that you don't always feel safe in high-rise blocks of flats. As well as responding quickly and effectively to fires, this plan explains how we will continue to work with local councils, the government and builders to make sure that those buildings are safe.
- You told us that you are worried about climate change. I am too recently, we have had some of our busiest days since World War II, attending more than 1000 incidents during the floods in 2021 and over 360 in one afternoon during the heatwave in 2022. This plan explains how we are going to change as the risk in London changes.
- Terrorism continues to concern you. You have told us this plan needs to make sure that our firefighters have the right equipment and training to deal with it.

 And you have told us that while you trust us, you don't always see enough of us or know everything we can do for you. You saw how important we were to London during the Covid-19 pandemic, with many hundreds of firefighters crewing ambulances and it reminded you of how much more we can offer.

This plan is about making sure we change how we do things to give you what you need. This means that:

- We must aim to achieve the best attendance times in the country. Getting that first fire engine to you in under six minutes is important to us and you.
- When I walk into a fire station, I'll see local people using it as their own, getting support for things that matter to them in their everyday lives.
- It means modernising our online services so if you can't see us in person, you can still get good advice from us.
- If I speak to a Londoner on their high street they will always know where their nearest fire station is and what we can do for them, and our staff

 firefighters, inspectors, cadets and outreach workers – will spend more time working in their local communities.
- Firefighters get better and more realistic training to make sure they are prepared to respond to the changing risk in London and that we give them the time and support to do that properly.
- We won't just leave after an incident. We'll ensure we stay and are there for you long afterwards to really make sure you are safe and to prevent anything happening again.

I hope this plan, written as we approach our 160th year, makes sense to you, reflects what you told us and ensures that London Fire Brigade continues to be trusted to serve and protect the world's greatest city.

Andy Roe

London Fire Commissioner



Introducing our plan

Deputy Mayor for Fire and Resilience

The world feels very different from when London Fire Brigade published its last London Fire Plan (LSP) in 2017.

Just a matter of weeks after the start of the LSP, the tragic fire at Grenfell Tower led to 72 people losing their lives. Many more lost homes, possessions, and loved ones. This rightly led to increased scrutiny of the Brigade and its response on the night. While London's firefighters showed enormous bravery that night, the Grenfell Tower Inquiry (GTI) Phase 1 report and a critical report by Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) prompted deep reflection about how the Brigade, as an organisation, serves London. This, alongside many conversations with Londoners, has formed the basis of this new draft strategy – Your London Fire Brigade. The focus of this plan is on Londoners and how LFB better serves, reflects and engages with the communities across the city it exists to protect.

The Brigade has much to be proud of. The pandemic brought with it challenges for the Brigade, both organisationally and personally for the people who work there. It demonstrated the best of LFB, as we saw it step up to play a major part in London's response to COVID 19. We saw firefighters driving ambulances and supporting, with dignity, those who died in the community, they provided a hub for the delivery of personal protective equipment and supported London's vaccination programme. At the same time, LFB continued their core work of response and retained some of the best attendance times to incidents in the country.

This plan lays out the work now needed for LFB to respond to the challenges ahead, many of which are brought by a rapidly growing and more complex built environment in London, where some boroughs have as many high-rise residential properties as other major cities in the UK. Even before this plan is rolled out next year, we can expect more scrutiny of the Brigade and the sector, including through reports from the GTI and Manchester Arena Inquiry and through the findings of the Independent Culture Review initiated by the London Fire Commissioner.

Ultimately though, this plan is about what Londoners want from their fire and rescue service. This plan has been developed in consultation with Londoners and sets out a new way of working. Not only does it describe what change the Brigade will deliver over the coming years, it also shows how the Brigade will deliver it. This includes a significantly increased level of interaction with London's communities, both before, during and after incidents, and having an increased focus on the most vulnerable Londoners.

The plan also outlines a number of ways in which LFB has to adapt to new and increased risks. LFB is often on the front line when it comes to the impacts of climate change. This plan identifies flooding and wildfires as events that happen with increasing regularity and commits the Brigade to support efforts to tackle climate change, including the Mayor's priority for the entire GLA family to become net-zero by 2030.

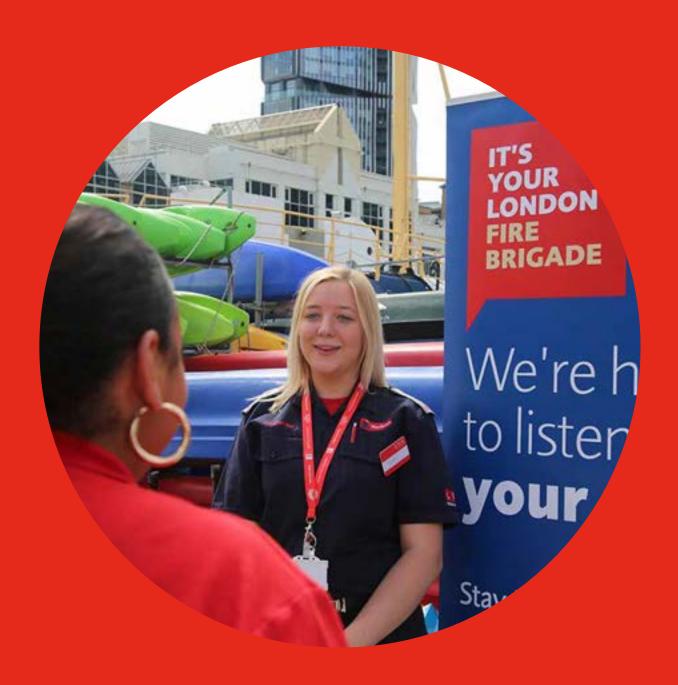
LFB, as an emergency service in a world city, is also regularly the first responder to terror incidents. Over the coming months and years, a step change in how LFB responds to terror incidents is being introduced thanks to an agreement between the Fire Brigades Union and LFB. This includes enhanced training and equipment for all London's firefighters.

Finally, since the last LSP, the way that LFB is governed has changed in order to increase the accountability of the Brigade. The London Fire and Emergency Planning Authority (LFEPA) was abolished in 2018 and the Commissioner took on the legal responsibility of the fire authority, with oversight from the Mayor, myself as Deputy Mayor for Fire and Resilience on behalf of the Mayor, the London Assembly and other stakeholders including government, local government, the HMICFRS, and London's communities.

Dr Fiona Twycross

Deputy Mayor for Fire and Resilience

Over the last two years we have worked with Londoners to create our new Community Risk Management Plan. It is called 'Your London Fire Brigade'. This plan meets our requirement under the Fire and Rescue National Framework for England to produce what it calls an Integrated Risk Management Plan. One of the most important things this plan must do is reflect our Assessment of Risk in London and what we will do to help reduce and respond to that risk. In the past, we have called this the London Safety Plan.



Protecting the London we love

In developing this plan, we have set out to listen and learn from you, the people we serve.

The challenges ahead

London Fire Brigade (LFB) is facing some challenges over the coming years. The cost-of-living crisis affecting millions of Londoners has the potential to increase existing inequalities in London's communities. Depending on its severity, the forecast economic recession may change LFB's operating environment over the period of this plan.

The Covid-19 pandemic has increased social exclusion and health inequalities across London, changed the way people work and the number of working poor. 28 per cent of Londoners live in poverty compared to 22 per cent in the UK¹. This puts added pressure on London's communities with pockets of economic deprivation alongside high levels of affluence.

London's air quality is one of the poorest in the country and the recent spate of wildfires next to London's urban areas, is a visible reminder of the future challenges the UK fire and rescue

service will face. London is the greenest city in Europe². Its green spaces, wildlife and surrounding rural land are vulnerable to wildfire resulting from increasing temperatures.

Changes to fire safety and building safety legislation have placed additional requirements on the fire and rescue sector. When coupled with worker shortages, increased levels of scrutiny, and constraints on public finances, the pressures on fire and rescue resources have never been higher.

Technology and data can help LFB adapt to these challenges. The Brigade will make sure that it is at the forefront of research into future firefighting methods. However, change takes investment, which will require a careful balance between current operational and economic pressures and a commitment to continually adapt services to meet London's future needs.





¹ London's Poverty Profile: 2020, Trust For London, April 2020.

² European First Time Buyer Report nerdwallet, August 2022.

A plan for change

We are undergoing considerable change. This plan is important because it is the first since the tragic fire at Grenfell Tower on 14 June 2017 in which 72 people lost their lives. As a result of that fire, the Brigade received specific recommendations from both phase one of the Grenfell Tower Inquiry and Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) about how we needed to improve. Since then, we have committed to doing everything that we can to learn the lessons from that tragedy and address those areas for improvement.

In his first month as London Fire Commissioner, Andy Roe launched the Brigade's Transformation Delivery Plan which set out how we would address the Grenfell Tower Inquiry and HMICFRS recommendations.

So far, we have:

- Introduced fire escape hoods to help firefighters rescue people.
- Welcomed into our fleet new 32m and 64m ladder appliances to help tackle fires in high-rise buildings.
- Rolled out an extensive programme of training for how the Brigade responds to high-rise fires.
 This includes when the 'stay put' guidance is no longer practical, and when a mass evacuation must be carried out.
- Launched an online Home Fire Safety Checker, as well as increasing fire safety visits to support businesses.
- Improved how we handle emergency calls to our Brigade Control to make sure that 'Every Contact Counts'.
- Set clearer expectations about how we treat each other and the people we serve.
 We now test for this when recruiting and promoting people.
- Started to use leadership goals and performance discussions against these expectations so that we put them into practice.

This plan pulls together all of our existing work as well as our ideas for the future, so that we have one plan which sets out our priorities.

 Trained assessors for recruitment and promotions, including how to manage and mitigate unconscious bias.

The Transformation Delivery Plan moved us forward and has formed the foundation for this community-focused plan.

This plan pulls together all of our existing work as well as our ideas for the future, so that we have one plan which sets out our priorities. We also know that we will need to adapt this plan in the future, following the next stage of the Grenfell Tower Inquiry and the outcome of a recent inspection from HMICFRS. We also await the outcome of the Government's recent consultation on 'Reforming our fire and rescue service' which set out proposals to introduce system-wide reform that will strengthen fire and rescue services in England.

We will involve the communities we serve as our plans develop so that we can be sure we continue to meet your needs.

Protecting the London we love

We want to protect the London we love and to be trusted to serve and protect you. To create this plan, we've been out in our communities, speaking to Londoners directly to find out what you want from us and how we can transform our services to meet your expectations. Londoners' views from public consultations in August 2021 and June

2022 have also helped shape this plan and our Assessment of Risk in London. You can read more about how that Assessment has changed here: https://london-fire.gov.uk/media/6688/crmp-aor-30-may.pdf

Here's what Londoners told us over the last year:

"**Trust** to me is reliability, responsiveness and care."

"Trust is the belief that when LFB need to serve and protect London, they will do it the best way they can." "**Serve** means they do their job, be responsive, have people's best interests at heart and do the right thing at all times."

"They will put the communities of London first and at the heart of what they do."

Trusted to serve and protect London

"Protect means to keep people's lives safe prior to an emergency, during and after and ensure the safeguarding of the community is their top priority.

"We want to feel that the emergency services are here to help us when we are at our most vulnerable."

"LFB must work for **London's** interests and ensure that the city is kept at its best.

"They must do what they car to protect people, animals and property in London."

How can we protect and serve you better?

This is what people told us:

"I want to know more about what LFB do on top of fighting fires."

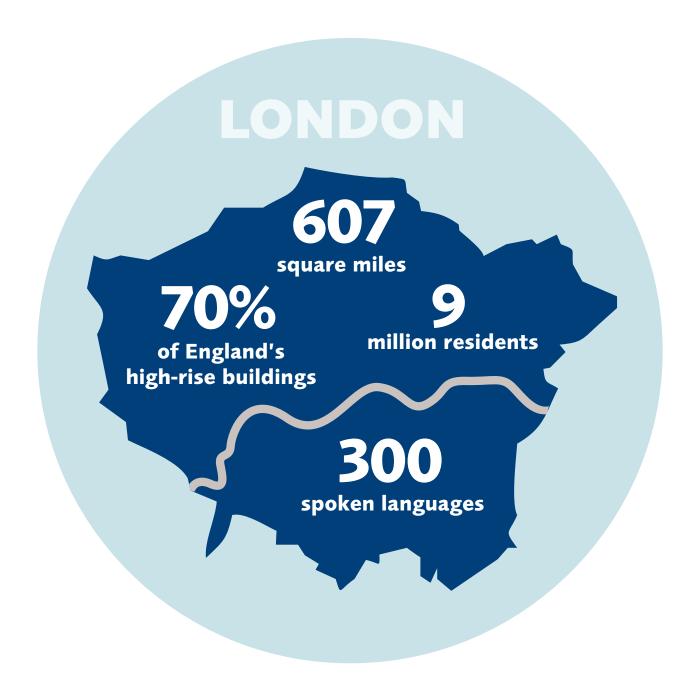
"I would like to see communication to residents about how LFB is a friend and part of their safety net rather than a big brother out to reprimand them." "Make it so that
I can call or visit
my local fire station,
similar to how
I can visit the
police station..."

"I wish LFB understood the specific needs of my community and could tailor their engagement approach with us based on this."

"After each incident, I would like information on what LFB can do to support me, what I can do to help myself and what can we do together."

"I want LFB to keep me up-todate on fires in my area."

"I want to know more about LFB's specialist roles and responsibilities." "I want to know more about how LFB works with the disabled, to ensure their safety is protected." "Advice and enforcement needs to be present from the very beginning of the planning stages."



The London we love

To continue to protect the London we love, we must look at its history, infrastructure, communities, and its changing needs. London has been the major hub of the United Kingdom since the Middle Ages and London Fire Brigade has been part of that history for over 150 years. This long-shared history means that today London is not only vital to the UK and global economy, but one of the best places in the world to live and do business.

London has almost 9 million people living in it. The City of Westminster alone has a population density of over 100 times the national average. At 6 per cent, London still has one of the highest population growth rates of any United Kingdom region in the last five years. At 22 per cent the latest Census shows that Tower Hamlets has the highest population growth of any region in England.³ This trend is expected to continue and over the next 10 years the population of London will grow to nearly 10 million.

³ UK Government 2021 Census phase 1 results.

London's skyline has changed from a sprawling lowrise city to a high-rise metropolis. London has one of the highest number of skyscrapers in Europe, with over 8,000 high-rise buildings. It accounts for around 85 per cent of the high-rise fires in England.

London's infrastructure runs in the air, under and over ground. It has many large train stations, the international channel tunnel railway and the new Elizabeth line, which expects to serve over 200 million passengers each year. London's mainline

train stations have a joint footfall of more than 470 million each year, which is one of the highest in the world.

There are over 300 different languages spoken in London which makes it the most diverse city in the world, where 40 per cent of its population identify as non-white. Pre-pandemic, London hosted over 30 million international tourists a year and we expect this to continue following the recovery from Covid-19.

About Londoners



More than 1 million Londoners are over the age of 65 with 28 per cent of them living alone. This figure is due to increase by 86 per cent by 2050.



Approximately 1.4 million people with disability live in London. 1.3 million of them are aged 16 to 64 years.



London is home to nearly half a million young people between the ages of 18 and 21. These people are often students living alone for the first time in purpose-built accommodation or in shared converted accommodation.



The pride of London is that we are a uniquely diverse city with over 40 per cent of the population describing themselves as Black, Asian or a member of another one of London's ethnically diverse communities. It is home to one of the largest lesbian, gay, transsexual and transgender (LGBTQ+) communities in the world.

To keep you safe we have

142

Fire engines strategically placed across all London's boroughs, some of which will be electrichybrid in the future



5,850

Dedicated and professional staff serving more than 9 million Londoners



102

Land-based fire stations, spread across London's communities



11

High-reach aerial appliances, for firefighting and rescue operations



14

Fire rescue units for technical rescue operations



7

Dedicated **chemical**, **biological**, **radiological nuclear** response teams for high threat response



2

Fire boats, with one immediately available at a dedicated river station for rescues and firefighting on the Thames



10

Inflatable boats for rescues on our waterways



1

Control Room answering all your 999 calls and coordinating our response



4

Community and fire safety dedicated teams



1

Operations Support Centre, 2 breathing apparatus satellite charging hubs, 6 operational support vehicles, 3 bulk foam vehicles and 3 hose layers



London Fire Brigade also has a range of national capabilities which include powerboats, urban search and rescue teams, and high-volume pumps



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We must assess all foreseeable fire and rescue related risks that could affect our communities, whether they are local, cross-border, multi-authority and/or national in nature from fires to terrorist attacks. We must put in place arrangements to prevent and mitigate these risks, either through adjusting existing provision, effective collaboration and partnership working, or building new capability.



Our understanding of risk

As an organisation that has been part of this city for over 150 years, we have developed a good understanding of where the risks lie for our communities. The conversations we have had with Londoners so far have helped us to build on this understanding and helped inform both our Assessment of Risk and our response to it.

How we define risk

Risk is defined as a combination of the likelihood and consequences of hazardous events. This allows the risk of incidents that may have happened only rarely, or never, such as widespread urban flooding and severe drought to be assessed alongside common risks such as accidental fires in the home or road traffic collisions. Where we describe a risk as being high or very high, this could be because of how likely it is to occur, how great an impact it could have or a combination of both.

Our Assessment of Risk

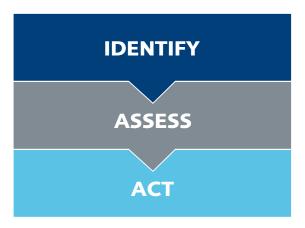
We use a range of methods to assess risk including historical incidents, data collection, the National Security Risk Assessment, the London Risk Register and looking at emerging and future trends. The assessment identifies and assesses current risks as well as potential new ones to give us a clear understanding of what is most likely to cause harm now and in the future. This underpins our plan so that we can make sure that the changes we are making have the biggest impact on our highest risks.

We asked Londoners what risks they face and how we can prevent those risks from happening and keep them safe. The feedback we received helped inform our Assessment of Risk and this plan.

"I personally would like more info on what to do in the event of flooding." "It would be reassuring to know that the fire brigade had assessed the building I work in for risks and given advice on how to proceed in an emergency situation."

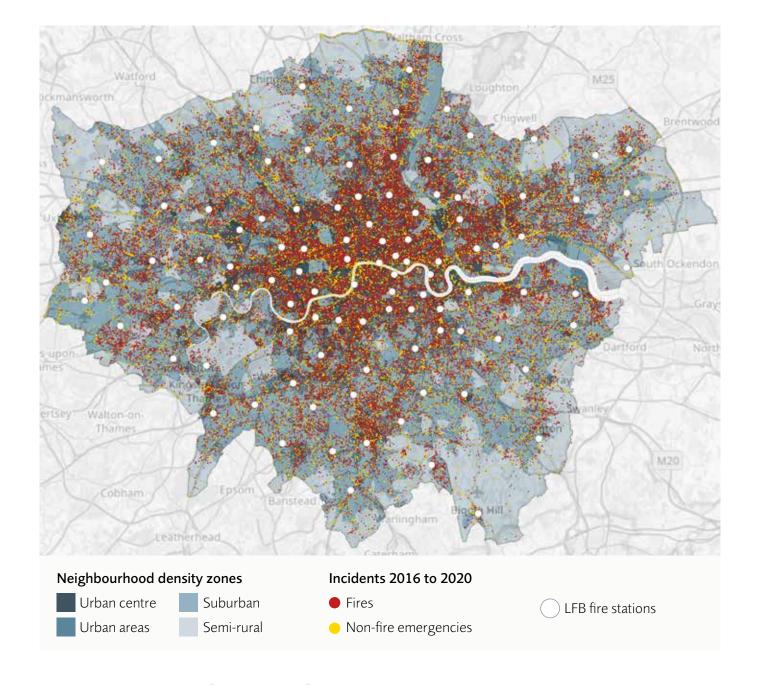
Our approach to assessing risk

We take a three-step approach to mitigate risk:



Our Assessment of Risk identifies and assesses all the risks that we might need to attend, both fire and non-fire.

Our response to that assessment sets out the actions we will take to reduce those risks and respond to them if they happen.



Mapping London's risks

This map shows areas in which incidents have occurred most frequently over the last five years. It also shows how our 102 land-based fire stations are located to provide a good response to our highest risk incidents. The map is shaded to show the concentration of risk by neighbourhood. Most risks are more likely to occur where there are more people or buildings.

We have categorised London into four neighbourhood density zones: urban centres, urban areas, suburban and semi-rural. This map illustrates that risk is concentrated in urban centres. The map does, however, also illustrate that high-risk hazardous events do occur across the whole of London.

People-centred risks

We have taken a people-centred approach to risk in London, putting Londoners concerns and vulnerabilities at the centre of our risk identification and assessment.

Using our understanding of what factors increase someone's vulnerability to fire and rescue incidents, we have combined this with Londoners' concerns about fire and other types of emergencies. Together they give us an understanding of people-centred risks. They can arise from people and their behaviours or from the places where people live, work or stay.

The people-centred risks are summarised as:



PopulationChanges in the size of the population can increase risk



Physical vulnerability
Certain vulnerabilities can increase risk



Social vulnerabilityDifferent
socio-economic
factors can increase
an individual's risk



Behavioural

vulnerability
Particular behaviours
can increase an
individual's risk

Those people-centred risks relating to places are summarised as:



Building location

The number or location of buildings can increase risk for example proximity to other high-risk buildings and/or availability of adequate water supplies



Building occupancy/use

The way a building is used or the type of people who use it can increase risk



Building ownership and management

The type of ownership and quality of management can increase risk



Building configuration and construction

The way a building is set out or the material used in its construction can increase risk

Major areas of risk

The categories of people-centred risks summarise the areas where Londoners are concerned for their safety. When these concerns are realised, they become hazardous events which we can rate. They may occur more frequently and so are included within day-to-day risks, or be rarer and included within our extraordinary risks. You can see the ratings of all these in our Assessment of Risk. The highest of these risks are these:

Day-to-day risks

On average, we attend nearly 300 incidents across London each day. The highest of these day-to-day risks which result in incidents which we most regularly respond to are:



Road traffic collisions



Outdoor fires



Fires in the home



Fires in large public and commercial buildings

Extraordinary risks

On occasions, London experiences a major incident. These extraordinary events can cause major loss of life and disruption and place significant strain on the emergency services. Londoners told us that they are particularly concerned about these. The major incidents we must prepare for are:



Terror-related



Influenza-type pandemic



Major fires



Urban flooding

Emerging and future risks

As well as current risks, we must also identify future risks so that we are able to adapt the services we provide to meet London's changing needs. Londoners told us that they are particularly concerned about risks that could arise under these areas, especially climate change. These are:



Population change



Sustainability and climate change



Changing built environment



Health, Security and resilience

You can read more about our approach to assessing risk and how we have rated risks in London in our Assessment of Risk.

You can find this on our website at:

https://london-fire.gov.uk/media/6688/crmp-aor-30-may.pdf

We will update this assessment every year.



Our response to risk

Our understanding of risk continues to change as London changes. The services we provide are updated as those risks change, such as our new enhanced capabilities to deal with marauding terrorist attacks. As a result, we are confident that we have the right balance of resources and capabilities to deal with all foreseeable risks in London that we might be expected to respond to – either on our own or with blue light partners.

We will continue to provide our current services, at least to their existing levels, and respond to local risks by improving our service delivery.

We will continue to update our understanding of risk throughout the life of this plan and keep the balance of our resources under review so that we are able to ensure our prevention, protection and response activities are always best placed to be used to prevent fires and other incidents and mitigate the impact of identified risks on Londoners.

However, we know that there are improvements we can make to our **Prevention**, **Protection** and **Response** services to make Londoners safer.

We will start by improving these services in the following ways, they will be:

- More productive
- Of better quality
- More people focused
- More adaptable to change
- More flexible to need

We will bring together and enhance existing services which do not form part of our prevention, protection and response services into three newly defined areas. These are:

Preparedness, Recovery and Engagement.

This will mean that you, as Londoners, are cared for, are safer during an incident and your needs are put at the centre of our services.



Our current services

Prevention, Protection and Response are our three statutory services which combine in an integrated way to keep you safe. We deliver a range of these services which aim to prevent fires and other incidents and mitigate the impact of all risks on London's communities.

Below is a summary of the range of services we provide within these three core areas of work.



Prevention

Our prevention services include:

- Home fire safety visits
- Youth services (school visits, fire-setters, cadets etc.)
- Community safety (road safety, water safety etc.)
- Safety campaigns and events



Protection

Our protection activities include:

- Fire safety advice and support for businesses
- Regulation of premises that are protected under the Regulatory Reform Order (RRO)
- Fire safety licensing
- Fire investigation
- Fire engineering



Response

We respond to a range of risks including:

- Fires and rescues
- Hazardous materials
- Road traffic collisions
- Complex incidents which require a multi-agency response
- Other emergencies

How we distribute our resources to Prevention, Protection and Response

We are able to respond to meet your expectations whenever you call, every day of the year, 24 hours a day. We are an all-hazard fire and rescue service and respond to a broad range of risks across London. We work within our resources to deal with everyday risks while supporting professional training and delivering a range of prevention and protection work. We do this while maintaining the capacity and resilience to deal with the largest emergencies in London, nationally or internationally.

We aim to arrive and deal with all incidents as quickly as possible, to save life and reduce disruption. We do this wherever they occur in London, as we know any risk has potential consequences for all Londoners, wherever it occurs.

Our intention over the life of this plan is to keep our existing attendance targets of a first appliance arriving within a pan-London average of six minutes, and the second appliance within a pan-London average of eight minutes, and to maintain the current number of fire stations, firefighters and fire appliances.

We provide most prevention and some of our protection services through our operational firefighters. In addition, we have central specialist teams who deliver prevention and protection services across the whole of London. We intend to continue to deliver our services making the best use of our specialist resources, so that you receive the service you need, when you need it, to keep you safe.

We know that the location and resourcing of local fire stations is important to the way we deliver our services and to Londoners. We intend to maintain our current balance of prevention, protection and response services across London to prevent fires and other incidents and mitigate the impact of all identified risks on London's communities throughout the life of this plan.

Our intention over the life of this plan is to keep our existing attendance targets of the first appliance arriving within six minutes on average, and the second appliance within eight minutes on average, and to maintain the current number of fire stations, firefighters and fire appliances.



What we will do differently

Prevention

Aim: To target London's most vulnerable people

We will:

- Continue to deliver our existing prevention services whilst finding opportunities to target high-risk people at a more local level, such as those who are unable to respond to an alarm, or those who demonstrate high-risk behaviours.
- Improve the availability of our online prevention services so that we increase the number of people who use our services.
 This will free up our resources to allow us to concentrate on targeting and tailoring our services to the most vulnerable groups within your communities.
- Target Londoners at an individual level through better use of our data and partnerships, to identify those people at greater risk from fire and other emergencies.
- Make sure that those in most need receive a more in-depth service so that they are supported to reduce their risk of fire and other emergencies.
- Improve firefighters' ability to help people change behaviours that can lead to more risk.
 This will be enhanced by targeted training and collaboration across all departments and partners.
- Work with the National Fire Chiefs Council (NFCC) to adopt national guidance for defining high-risk people, properties, and places so that we can better target our services to those that need them most



- Embed ourselves in communities through our fire stations and local partnerships so we can spend more of our time working with communities and local people to help make them safer.
- Place our firefighters at the heart of the communities they serve, delivering the services that local communities want to make them feel and be safer.
- Monitor and update our Prevention Strategy to make sure that it reflects our latest understanding of risk in London.

Protection

Aim: To target London's most high-risk buildings

We will:

- Focus our protection services against high-risk buildings and align to National Standards, to make sure that buildings such as care homes, are prioritised.
- Provide each premises with services relevant to its risk profile and needs. Target our reinspection resources where they will make the greatest difference to reducing risk, such as the risk of fire in residential high-rise buildings.
- Continue to work with local business owners, especially where high-risk businesses are in residential buildings so that they comply with Regulatory Reform Order (RRO), providing more support and guidance to help them understand and follow legislation.
- Continue our work with the NFCC so that there is a more consistent approach to finding the highest risk properties across England and apply this in London.
- Continue our fire safety checks, delivered by operational firefighters, which support statutory requirements under the RRO and will effectively target lower-risk premises offering advice and guidance to London's business owners. This will increase the ability of our specialist officers to target high-risk properties.
- Make more of our protection advice available online so that it can be accessed whenever you need it, at the touch of a button. This will enable us to help support London's business communities' understanding of the RRO and target our face-to-face protection services at the most high-risk buildings.



- Align our protection advice against our most up to date understanding of risk to make sure that we are always targeting London's highest-risk buildings and those who do not comply with the RRO.
- There will be significant changes to the duties of premises owners and the regulation of building safety as a result of the introduction of the Fire Safety Act 2021 and the Building Safety Act 2022. We will continue to work with the responsible persons for building safety to increase their understanding of the new requirements and support their implementation. We will also work with the new Building Safety Regulator, established as part of the Building Safety Act 2022, to agree how our respective roles will improve the safety of London's buildings.

Response

Aim: To protect Londoners from highest risk incidents

We will:

- Continue to make improvements in our capabilities to respond to London's highest risks by upgrading and introducing new equipment and training.
- Make sure that we have the right number of skills and equipment in the right areas based on our most up-to-date risk assessments so that we can keep all Londoners and our firefighters safe.
- Become more flexible in how we deploy our operational resources so that we can continue to provide an excellent response, whatever the future holds.
- Improve our productivity so that operational staff can deliver better prevention and protection activities, targeting the highest risk areas and training our staff to the high standards you and we expect.
- Review the locations of our specialist appliances so that they are in the best locations to deliver a good response to our highest risk incidents.
- Develop more proactive support for communities before, during and after an incident, so that you receive the right support and advice, and can access other services to make you safer.
- Improve the speed at which we adopt the most modern fire and rescue technology and tactics, to enable us to respond better to all types of emerging risk such as the risks from electric vehicles and lithium-ion batteries.
- Work with neighbouring services and partners to anticipate future needs, such as risks from climate change, so that we can adapt our response strategy and prepare for increases in future extreme weather events, such as urban wildfires and flooding.



- Build on our excellent work with the London Ambulance Service during the COVID pandemic to increase London's resilience during major incidents.
- Fully embed our response to marauding terrorist incidents and the learning from public inquiries and other international terror incidents, so that all firefighters can safely and effectively respond to risks posed by terrorrelated and high-threat incidents.
- Increase the number of major incident and cross-border exercises with partners so we are fully prepared for low frequency, high-risk events.

Protecting you by enforcing fire safety laws

There are over 800,000 premises in London covered by the Regulatory Reform (Fire Safety) Order (RRO), which is the main piece of legislation that we enforce. The RRO puts the emphasis on the responsible person to comply with the law.

We cannot visit all such premises, so we operate a Risk-Based Inspection Programme which aims to protect the most vulnerable and those that are more likely to experience a fire. Our Risk-Based Inspection Programme is generated each year by our fire safety database. It is primarily based on specialist officers' assessments at a local level as to which premises should be audited, applying a London-wide approach to assessing risk and taking into account local and national priorities. Specialist inspectors then decide what form the fire safety audit of each identified set of premises should take. For example, care homes are occupied by some of London's most vulnerable people, so some of these will be inspected each year. We use our extensive database of where fires happen to ensure that these types of premises are getting the scrutiny they deserve. We intend to review our approach in the light of amended national guidance when that guidance is published.

Although the legislation relating to rogue landlords is enforced by local authorities, London Fire Brigade works with borough partners to ensure the Brigade protects the most vulnerable people against them. Where the risk is sufficiently serious, the Brigade can use prohibition powers to make people safe.

Where we identify non-compliance through our inspection programme, post-fire inspections or a complaint, then we will take the necessary action to ensure that buildings are safe. However, most of our work is around educating the business community in how to make their premises safe in the first place.

We have a responsibility to look at new buildings before they are built or refurbished to ensure that they are safe to be occupied and that if they do have a fire, they will be safe for firefighters. We also look at premises that apply for different types of licence to ensure they are safe before a licence is granted. Last year the London Fire Brigade received almost 20,000 new build, refurbished or licence applications. Working in partnership with the business community ensures that our limited resources can reach a much larger audience.

We believe in firm but fair enforcement of fire safety law. In carrying out our enforcement functions we aim to:

- prioritise our inspection and enforcement action based on risk;
- apply the principles of proportionality in applying the law and securing compliance;
- be consistent in our approach;
- be transparent about how we operate and what can be expected by those we regulate;
- be fair and objective in our application of enforcement action and comply with all duties under the Equalities Act 2010;
- encourage and promote compliance and try to minimise the negative impact of our regulatory activities;
- use statutory powers to take formal enforcement action only where it is justified on the basis of risk or significant or repeated noncompliance with the law;
- offer the opportunity for the person against whom formal enforcement action is to be taken to discuss the circumstances of the case and, if possible, resolve points of difference (unless immediate action is needed to protect life);
- be accountable for our actions.

Our approach to enforcing the RRO is set out in more detail in our Enforcement Policy Statement, which can be found here Enforcement Policy Enforcement policy statement-dec-2020.pdf).

We will introduce three new services

With the range of risks facing London we know that we cannot prevent, or protect everyone from, all foreseeable risks. Though we have often delivered services which do not form part of our prevention, protection and response services, under different names in the past, we have developed three new distinct service areas to enable us to give these services added focus and reduce risk in London's communities through other means which do not fit in with our Prevention, Protection and Response services.

Our three new services are designed to ensure that people both feel safer and can take positive action to make themselves safer, in their home, at work or in a public place. We will do this by enabling Londoners to be better prepared for and recover more quickly from an incident. These new services are outlined below.



Preparedness

Working in partnership, we will work with local communities to help them be ready for a range of possible incidents, such as flooding, supporting those of you who need our help prior to our arrival on scene. We will work with partners across London so that communities can play an active part in reducing risk, so that they are prepared for an emergency.



Recovery

We will improve our support for all of London's communities after an incident has occurred to enable individuals and communities to recover more quickly from hazardous events. We will work with communities and other organisations to help everyone become active partners in preventing future emergencies and support the return to normality as quickly as possible.



Engagement

Further improved community engagement will help increase awareness of our services and better serve London's seldom heard communities. This service will enable us to understand a community's specific needs and expectations so that we can tailor our services to improve outcomes for all. We will work to develop strong partnerships with London's most vulnerable groups.

We will work to reassure communities to reduce their concerns relating to people and places identified by Londoners in our Assessment of Risk and enable them to access our services and those of partners which make the most difference to their safety. We will work to support communities through partner agencies to reduce the mental impact of incidents and close the gap between perceived risk and actual risk in London's communities.

How we work in partnership

We know that the most effective and efficient way to deliver our services is often working in collaboration. We work with partners across London at a local level, through local authorities and community partnerships, pan-London through the London Resilience Partnership, with our neighbouring fire and rescue services sharing resources and risk information. We also work at a national level, through National Resilience and the National Fire Chiefs Council (NFCC).

Each of these partnerships aim to do the same things: prevent fires and other incidents and mitigate the impacts of identified risks. In the future, we also want to build on our strong partnership work and influence wider public safety in London by supporting the Mayor to meet climate change targets. We will do this whilst working with blue light partners to improve public safety and partner nationally for economies of scale.

We will build on our strong partnership work and influence wider public safety in London.

Our contribution to National Resilience

The government's National Resilience Capabilities Programme (NRCP) aims to increase the capability of the United Kingdom to respond to and recover from civil emergencies. It does this by building capability to deal with the consequences that are common to most types of emergency, regardless of whether those emergencies are caused by accidents, natural hazards or man-made threats.

The risks that the UK faces are constantly changing. The government monitors the most significant emergencies that the UK could face over the next five years through the National Risk Assessment (NRA). The National Risk Register (NRR) is the public version of this assessment. It provides advice on how people, businesses and the emergency services can better prepare for civil emergencies, providing an assessment of the likelihood and potential impact of a range of different civil emergency risks.

The government also provides guidance to local resilience forums on how to interpret the risks in the National Risk Assessment and National Risk Register to help with their local assessment of risk. This ensures that risk assessment at all levels of government is integrated, so it can underpin sound emergency planning throughout the country.

The Civil Contingencies Act 2004 also requires emergency responders (such as London Fire Brigade) to help maintain a public Community Risk Register. We incorporate both the content of the National Risk Register and the London Risk Register in our planning assumptions.

We have statutory duties under the Civil Contingencies Act to ensure that appropriate arrangements are in place to respond to emergencies as well as maintaining core services.

We have a range of specialist vehicles and equipment to respond to emergency incidents with the capability to deliver a co-ordinated response to a range of serious, significant or catastrophic incidents that have a national impact, and are currently working with the Home Office to develop some of these capabilities further. Our existing capabilities include:

- Responding to and dealing with chemical, biological, radiological, nuclear explosive incidents
- Urban search and rescue
- Water and high-volume pumping
- Flood rescue
- High threat response

20 per cent of the assets that provide national resilience are located in London, reflecting the importance of the Capital and its capacity to support resilience across the country.



How our services will better meet your needs

Prevention services

Prevention services are targeted at the most vulnerable and delivered by teams who understand the needs of local communities.

Outcomes for Londoners

Communities will access these services easily through in-person and virtual channels. We will have a wide range of services in place to help reduce risk in the homes of those who are most vulnerable to fire and other hazards.

Protection services

Protection services meet the needs of communities, enforce safety legislation, and supply guidance.

Outcomes for Londoners

Communities and businesses will understand the Brigade's role in protection activities. They will easily receive advice and guidance related to fire safety from the Brigade. The highest risk premises will be targeted and prioritised.

Preparedness services

Preparedness services are well known and accessible, enabling individuals and businesses to respond to emerging risks.

Outcomes for Londoners

Communities will be aware of the Brigade's preparedness services and how to access them. They will understand how they can be active partners in risk reduction and make themselves and their properties safer from a range of risks. They will be more aware of new threats and how to prepare themselves.

Response services

Response services are still critical for London Fire Brigade. Staff are equipped to respond quickly to create the best outcomes for communities.

Outcomes for Londoners

Communities can easily access response services through a range of channels. Aftercare will be offered routinely. Communities will be actively encouraged to supply feedback to the Brigade so that we can improve our services.

Recovery services

Recovery services support those in need to mitigate the impact of an incident, with London Fire Brigade and partners working hand in hand proactively supplying post-incident care.

Outcomes for Londoners

Communities will be consistently offered the right services after an incident to support recovery and mitigate the effects of an incident. This will be well known across all of London's communities and London Fire Brigade. Communities will have access to tailored services to reassure them and enable them to become active partners in their recovery.

Engagement

Engagement is key to raising awareness of London Fire Brigade services and with partners supporting communities in times of need.

Outcomes for Londoners

Communities will easily engage with the right people with the right skills to address their concerns. They will have more influence over our assessment of risk and our response to it. Engagement delivers reassurance and helps to build trust across all of London's diverse communities.



Emerging and future risks

A recent report by the Centre for London stated that:

"Disadvantaged and excluded communities are already bearing the brunt of London's polluted air, the risks of excess heat, and more frequent extreme weather events caused by climate change... London will not achieve netzero unless we bring all London's communities together."

London's emerging and future risks

These are the four categories of emerging risk that we have identified in our Assessment of Risk:

- Sustainability and climate change
- Health, security, and resilience
- Changing built environment
- Population change

Sustainability and climate change

The severity and frequency of events caused by climate change are likely to increase in the future. We will seek to ensure that it has the capacity and the capabilities that are needed to respond to such incidents. The following are examples of emerging risks in this area.

Urban wildfires

The extreme temperatures experienced by London in the summer of 2022 are an indication of how firefighting in London may evolve over the next few years with drought and heatwaves becoming increasingly common.

As with all major incidents, we are undertaking a full review following the 2022 heatwave. We expect the results of this to lead to improved equipment and training to ensure that firefighters are better prepared in the future.

We will work with partners to prevent fires from occurring and reduce any additional health risks posed by fires across London.

Severe drought

The London Risk Register defines a severe drought as three consecutive winters of unprecedent low rainfall, with severe water supply issues for millions of London's households. Under these conditions water for firefighting will be reduced in many areas and require alternative sources.

We will continue to make improvements to our response to wildfires over the course of the plan. We will improve our prevention and preparedness activities relating to fires which occur on the edge of densely populated urban areas and pose a risk to people's lives and property.

⁴ Centre for London, A New Vision for a Better City, 2021.

Sustainability and climate change contd





To mitigate this risk, we are developing a water strategy so we have a scalable response to enable us to obtain water or firefighting purposes whenever it needs. We will continue to work with the water authorities across London so that we are able to meet our water requirements for firefighting.

Urban flooding

Recent extreme weather events have seen more regular surface water flooding incidents occurring across London. Such events put significant strain on our mobilising systems and personnel, with increased call volumes and use of fire engines. People who live in basement properties are particularly vulnerable to such risks.

We have delivered an improved response to urban flooding, including new, more powerful inflatable rescue boats on its fire rescue units, protective flood barriers, improved training for specialist crews and more flood personal protective equipment. Through the London Resilience Partnership, we are working with partners to reduce the risk of surface water flooding to Londoners.

We will continue to collaborate, so that we have the right resources and right processes in place to reduce the risk from urban flooding to Londoners.

Alternative fuels

Changes to how Londoners move about the city and the buildings they live in, are contributing to the changing risks that we face. Recent years have seen an increase in the use of lithium-ion batteries to power scooters, bicycles, and cars. This has led to changes to the risks found in people's homes, which are now used to store electric scooters and bikes, or for charging electric vehicles.

Through the National Fire Chiefs Council, the UK Fire and Rescue sector is undertaking significant work to agree national guidance for all fire and rescue services to reduce the risks posed by alternative fuels.

We will work closely with Fire and Rescue Service partners, academic institutions and communities to develop new training, tactics, and equipment to deal with these risks. We will also work with organisations that are more likely to use alternate fuels, like Transport for London, to help them understand and reduce that risk.

Health, security, and resilience

The resilience of our communities will continue to be tested on an exceptional basis, as terrorists adapt their methods, and on a day to day basis, as health inequalities increase. The following are some of the ways in which we may need to respond to increasing risk in this area.

Air quality and climate change

Parts of London have some of the worst air quality in the UK. We have an important part to play in improving the quality of air in London by reducing the emissions from our vehicles and improving fire stations' energy efficiency.

We are committed to meeting the Mayor's net-zero target by 2030 and we are introducing our first zero-emissions fire engine. We will continue to deliver our transformation to net-zero throughout the plan.

Terrorism and resilience

The nature of terrorism is always changing with new methods of attack continually being developed. This includes cyber-terrorism as well as conventional forms of terrorism.

We will continue to work with our blue light partners so that we learn from high-threat incidents and implement the changes necessary to keep Londoners safe from the risk of terrorism and radicalisation.

We will continue to develop the way we support other blue light partners during periods of high demand and increase London's resilience to major incidents. We will provide training for our staff so they can respond effectively and safely to terrorist incidents.

Changing built environment

Changes to our understanding of risks associated with the built environment and how we use our buildings are likely to mean we must adapt our protection advice and how we respond to incidents. Below is an example of the emerging risk in this area.

Modern methods of construction

London's buildings are changing in response to demands for improved building safety and reduced carbon emissions. This will result in alternative approaches to construction, refurbishment and the use of materials.

We have made some significant improvements over the last few years to manage these emerging risks, including improved operational response procedures to deal with fires in cladding and high-rise buildings.



Population changes

Population growth and changes to the way we live and work are impacting on how people use our services and how we respond. These are just two of the issues that may affect our Assessment of Risk in the future.

New homes

As London's population grows, it places additional pressures on its roads and buildings. London faces additional challenges with changes to how people work, with more people working from home, and therefore altering the life risk profile across London throughout the day and night.

We will continue to work in partnership with planners, housing and care providers and the voluntary community to deliver safer buildings for Londoners to live and work in and have appropriate methods for escape in the event of a fire.

Changing neighbourhoods

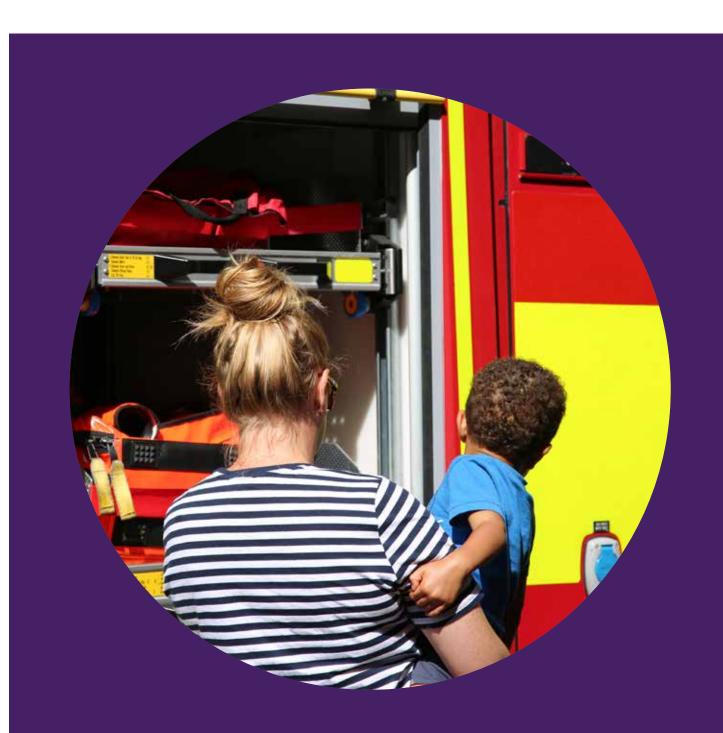
London's roads can be congested with high levels of traffic, and this can be exacerbated in some areas by local disruptions such as roadworks. Schemes to encourage sustainable transport modes such as public transport, walking and cycling, can alleviate congestion while improving air quality and the health of Londoners, but also entail changes on London's roads, including traffic calming measures. To mitigate any impact of congestion, road disruptions and traffic calming measures, we maintain a resilient network of fire stations across London. We also send the closest available fire engine to an incident so that we always respond as quickly as possible.

During the plan, we will be updating our mobilising system so that our fire engines can continue to respond as quickly as possible whatever the emergency.





We are committed to meeting the Mayor's net-zero target by 2030 and are introducing our first zero-emissions fire engine. We cannot foresee all future risks which might harm London's communities. We will work with partners across the fire and emergency sector, nationally and internationally to share learning from each other's experiences and anticipate future demands for our services. We will continue to update our understanding of risk in London on an annual basis and adapt this plan in response to any significant event or change to London's risk profile.



Our strategy for change

Our vision is to be trusted to serve and protect London and we want to make sure we are doing that in a way that makes sense to all the people who live in, work in, and visit London. We want to work in the heart of the communities we serve to help keep Londoners safe.

This plan sets out how we intend to achieve our purpose over the coming years. It remains anchored in the purpose and vision we established in response to the recommendations from the Grenfell Tower Inquiry. It describes four new pillars that the Brigade will work to over the life of the plan and eight new commitments. Each of these will impact upon the services we provide, helping us to improve them so that we can work with you to make you safer.





Our pillars and commitments

In this section, we tell you more about our pillars and our commitments to you. Under each pillar we explain our goals and provide a case study as an example of how we want to change in future. Under each commitment we explain what we are trying to achieve, how we will do it and how we will measure the success of what we do.

OUR PURPOSE AND VISION

Trusted to serve and protect London

OUR FOUR PILLARS

ENGAGINGWITH YOU

PROTECTING YOU

LEARNING FROM OTHERS

ADDING VALUE

OUR EIGHT COMMITMENTS

COMMITMENT 1

We will work with you to provide localised services that meet your needs



COMMITMENT 2

We will make it easy for you to access our services



COMMITMENT 3

We will adapt our services as your needs change



COMMITMENT 4

We will design services around your needs and concerns



COMMITMENT 5

We will enable our people to be the best they can be, to serve you better



COMMITMENT 6

We will work together to provide the best possible services to meet your needs



COMMITMENT 7

We will be driven by evidence to give you the value you expect



COMMITMENT 8

We will work with other organisations to secure a safer future for everyone



OUR SIX SERVICES

PREVENTION
PROTECTION
PREPAREDNESS
RESPONSE
RECOVERY
ENGAGEMENT

Our pillars describe the four areas where we will focus our work over the coming years. Under each pillar are two commitments which set out our objectives. They are a direct response to feedback from Londoners. They address you directly, emphasising our focus on what Londoners have told us over the last year, and our understanding of your expectations.

ENGAGING WITH YOU





Working with you to understand your needs and concerns

Londoners told us they want a more localised service, so we will ensure communities have more influence about what we do locally to reduce risk. Londoners also said they wanted easier access to our services. We will help you engage with us in more accessible and inclusive ways that suit you.

We will:

- work with communities to better understand risk at a local level and agree plans to work together to reduce that risk
- move away from a one-size fits all approach and tailor our services to the needs of individuals, offering online services for those who can access them.

Case Study: Lewisham Road Fire

In the early hours of Friday 1 April 2022, a very visible fire broke out in Lewisham. The incident was used to help the Brigade test a new way of supporting people in the local area to access Home Fire Safety Visits following a serious incident.

Using pictures taken at the scene the Brigade created an advert to run across Facebook and Instagram targeted at people living in Lewisham.

The advert asked people to check their fire safety and directed them to the online Home Fire Safety Checker. This reached 7,480 people with 23 people completing an online fire safety triage and seven people completing a full online fire safety self-assessment.

This was the first time we have used this approach, and we will do more of this to improve people's access to our services.

PROTECTING YOU





Supplying the right services to keep you safe

We are expected to predict demand, understand risks that could affect you, and adapt as your needs change. We will put improved focus on finding future risks and update our services for rescue operations. We'll also design services around your needs and provide services that better meet the needs of everyone before, during and after an incident, based on what Londoners have told us they would like to see.

We will:

- modernise our services, especially our emergency response, and do our best to predict and ready ourselves to meet future needs as risk changes across London
- work with people so they are better prepared if they have an emergency, respond fully to their needs when we attend and help them to recover afterwards.

Case Study: 999Eye

Control officers can now access vital live incident footage from the smart phone cameras of Londoners, using 999Eye. Callers send live stream videos of incidents straight into the Brigade's Control centre. This new technology provides officers with greater situational awareness at the crucial early stage of an incident and enhances their decisions about what resources are needed at the incident.

When a 999 call is received by the Brigade, the caller may be asked if they would like to provide a live video stream of the scene using their smartphone. The Control Officer then sends a text message with a secure, one-time-use link that opens a live stream direct from the phone to the Control room. There is no cost to the caller and no other data is taken from or stored on the caller's phone.

This is an example of how we can make better use of technology to improve how we respond to incidents and provide other services. We intend to continue this service and introduce pre-incident guidance to help reassure anyone calling us and let them know what to do to keep themselves safe before our arrival.

LEARNING FROM OTHERS





Listening and developing together to achieve our best

We will be learning from you to understand what we need to do to better train and equip our staff to provide you with the services that you need. We will focus on our internal culture, to ensure we have shared excellence across all departments. We will focus on staff wellbeing and developing our talent.

We will:

- improve how we support, equip and train our staff, seeking feedback from the public and our partners so that we fully understand what needs to improve and creating an environment where everyone can thrive
- make sure that, across the Brigade, we are all focused on working together to provide better services to the public and that each of us understands how we contribute to protecting London.

Case Study: New Providence Wharf

On Friday, 7 May, 2021, a fire occurred in New Providence Wharf, East London. A smoke ventilation system failed resulting in the building acting like a 'broken chimney'. This meant that the only escape route for residents was smoke logged.

In response to the emergency, the Brigade evacuated all the residents of the building, who were advised to go to a rest centre set up at a nearby hotel. With 200 people present in the centre, the Brigade offered support, talking with residents and gaining an understanding of their needs.

Our response focused on delivering a communitycentred approach. The aftercare for the community in the rest centre included:

- Conversations with residents to discuss their personal and cultural needs.
- Establishing an understanding of their expectations of support from the Brigade.

- Establishing a preferred channel of communication with residents.
- Advice and reassurance from the Borough Commander and local crews.
- Follow-up meetings with residents to discuss their ongoing safety concerns.

The response to the New Providence Wharf fire showed the significant changes the Brigade has made since the Grenfell Tower fire. An increased number of firefighters and appliances were initially sent to the incident. This is now seen as standard for high-rise fires. Community engagement was targeted, resulting in key aftercare and extended support for the community. There was vital collaboration across the Brigade with familiarisation visits conducted by crews. There was an ongoing presence after the incident, which was essential for building trust. We intend to build on this approach in future.

ADDING VALUE



Investing in what matters most to you to deliver public value

Londoners expect us to be efficient, to know what works and therefore how best to use your money to improve your safety. We will move from being very experience-led to become more evidence-led. We will work with other organisations to secure a safer future for everyone.

We will:

- use data better so that we make evidence-led decisions to improve our services and drive productivity
- work with, and sometimes lead, other organisations to address people's wider concerns about their safety, including protecting the environment.

Case Study: Working in partnership

The outbreak of the Covid-19 pandemic led to the biggest blue light collaboration ever between London's three emergency services. The London Ambulance Service (LAS), Metropolitan Police Service (MPS) and local authorities asked the Brigade for help in response to the pandemic. We responded by launching Operation Braidwood. This was a large-scale deployment of firefighters to help our partners and the NHS. We developed the following response to support the LAS and NHS across London:

Ambulance Driver Assist – We provided drivers to help crew ambulances to alleviate the shortage of LAS drivers.

Pandemic Multi-Agency Response Team – Individual firefighters formed teams with staff from the LAS and MPS to respond where people who may have had Covid-19 had died at home and needed specialist transport to a mortuary.

Mortuary Body Handling –Individual firefighters volunteered to help mortuary staff to provide additional resources if needed. Staff received training and were ready to respond, although this role remained on stand-by during the pandemic.

Personal Protective Equipment (PPE) – The Brigade Distribution Centre became a hub for receiving large deliveries of personal protective equipment and distributing it to partners across all London's boroughs.

The success of these projects was the result of effective collaboration between the Brigade and our blue light partners, the NHS, the Greater London Authority and local authorities.

We will develop these partnerships and look for more opportunities to continue to work with blue light partners and others to provide a safer future for everyone.

ENGAGING WITH YOU: Community-focused

Commitment 1 We will work with you to provide localised services that meet your needs

In this commitment, we want to provide more localised services and give you more influence about what we do to reduce risk in your communities.

We want to build trust between the Brigade and you, enhance our understanding of local risk profiles and vulnerabilities.

We also want to build a workforce that better reflects and understands London's communities, support the proper provision of services according to need and create opportunities for more integration within our communities.

How we will achieve this

Empower local Brigade leadership – Introduce Local Risk Management Plans, which will be co-designed with local residents and business, to enable fire stations to have greater control and influence to adapt prevention and protection activities to local risks.

Local community engagement – Community engagement sessions will run in each local area to enable us to better target **prevention** and **protection** activities to reach you and all of London's diverse communities.

Local risk analysis – Data will be available down to an individual property level to allow local areas to plan their **prevention** and **protection** activities to reduce local risks.

Using technology to support local delivery – Technology will be used to enable local Brigade staff to easily capture and share local risk information to enhance prevention, protection and response services.

What you said

"I believe it would be useful to educate members of the public on the work of the fire brigade and to stress that the fire brigade is an essential part of the community with a local presence."

"I have a good impression of LFB but think they can do more to interact with the community and should never stop trying to improve services."

Deliver togetherness – We will support London to realise people's ambitions around inclusion and diversity.

How we will measure our improvement

- Community Satisfaction Ratings
- Assessment of our impact on communities
- Staff composition (eg gender, ethnic diversity and people with disabilities)



ENGAGING WITH YOU: Service-led

Commitment 2 We will make it easy for you to access our services

In this commitment, we're moving away from one-size fits all, to tailoring our approach to meet your needs. In doing so we will become more accessible and inclusive.

We want to increase public access and understanding of the services we provide, and their value. We want to improve how we can meet your needs by finding out how we can adapt our services to suit you.

What you said

"If they seem more approachable, we will probably take more steps to be safer."

"Direct interaction is the best way to understand your community."

How we will achieve this

Online prevention and protection

services – You will be able to easily access answers to common questions in languages other than English, to help you understand our services and request relevant **preparedness**, **recovery** and **engagement services**.

Flexible ways to access services – We will improve our understanding of your personal circumstances and needs to help us better target our **prevention** and **protection** activities.

Non-emergency line – You will be able to access services through a broader range of methods and get non-emergency **preparedness**, **response** and **recovery services** for advice and reassurance.

Harnessing the power of social media – We will use digital technology to help us understand your needs in more detail so we can adapt our **prevention** and **protection services** to support you.

Community-led fire stations – We will place our fire stations at the heart of your communities to ensure we are accessible and inclusive to all Londoners so that everyone can access our **prevention**, **protection** and **response services**.

We will also open a new LFB Museum – designed with local communities to provide a unique forum for engagement and education and where all will be able to access prevention, protection and recovery services.

How we will measure our improvement

- Number of triages via our online Home Fire Safety Checker
- Community Satisfaction Ratings



PROTECTING YOU: Adapting to change

Commitment 3 We will adapt our services as your needs change

In this commitment, we want to become more proactive and flexible.

We want to meet you and your communities' evolving needs, while predicting future needs. We will also deliver a fit-for-purpose service based on evidence. This will improve our ability to respond to new risks such as those relating to the built environment and climate change.

How we will achieve this

Future fit – We will look to the future to ensure we are able to adapt our **prevention**, **protection** and **response services** to the evolving needs of London's communities.

Adapting to changing demands – We will find underlying trends in our services and forecast to ensure we adapt our prevention, protection and response services for future demands.

Predicting future needs – We will use advanced modelling techniques to enable us to adapt our **prevention**, **protection** and **response services** to changing risks.

Replacement mobilising system – We will improve the way we mobilise and coordinate our **response services** to improve outcomes for you.

Incident management improvements – Our command units, breathing apparatus and radios will be enhanced for improved incident management and response.

Modern fire and rescue technology, training and tactics – Cutting edge fire and rescue technology and tactics will be adopted to improve our response services according to your needs.

What you said

"Be as proactive as possible in dealing with situations that confront LFB arising from poor/bad building and other safety regulations; to challenge these wherever possible."

"I think understanding the diversity within communities and how that affects behaviours and level of risk."

Shared situational awareness – We will improve the sharing of information at operational incidents within the Brigade, and with partners to improve our **response services**.

Caller awareness – We will offer you more support when you make a 999 call to help you give us the information we need to assess risk and provide better **response services**.

How we will measure our improvement

By using our four appliance attendance targets, and with the following:

- Percentage of firefighters who have received training to respond to a marauding terrorist incident
- Alleged fire risks addressed within three hours
 - Ratio of high-risk audits completed
 - CommunitySatisfaction Ratings



PROTECTING YOU: Driven by outcomes

Commitment 4 We will design services around your needs and concerns

In this commitment, we want to move from being focused on targets to being focused on outcomes.

We will deliver our services according to your needs. We will improve how we communicate our services to London's communities. We will support the wellbeing of our communities after an incident has occurred.

How we will achieve this

Improve awareness of our services – We will do more to promote our prevention, protection and response services so that everyone is aware of what we offer, how to access them and the value these bring to London's communities.

Closer partnership working – We will support you with guidance to make every interaction meaningful, so our **prevention**, **protection** and **response services** are more targeted and meet your needs.

Enhanced support services – Through proactive and continued support, through all stages of our **preparedness**, **recovery** and **engagement services**, we want to increase trust in the Brigade.

Automatic service recommendations – We will enable everyone to easily find our **prevention**, **protection** and **response services** and confidently recommend wider Brigade and partner services.

Live incident updates – We will support you during our **response** to an incident by sharing guidance and signposting you to other organisations if necessary.

What you said

"If I knew they could communicate with me according to my needs, I would be more willing to phone them."

"More information on who to contact in non-emergency situations, e.g. what to do when drain flooding occurs that isn't affecting electricals but there is standing water – who to contact, how to clean, etc and who to help with the aftermath of a fire/flood."

How we will measure our improvement

- Number of fires and casualties from fires
- Station staff time spent on prevention and protection activity
- Percentage of high-risk home fire safety visits
 - False alarms due to Automatic Fire Alarms (AFAs) in non-domestic buildings
 - CommunitySatisfaction Ratings



LEARNING FROM OTHERS: Best people

Commitment 5 We will enable our people to be the best they can be, to serve you better

In this commitment, we will be learning from you to develop a shared understanding of excellence.

We want to better train and equip our staff to provide you with the services that you need. We will do this by investing in them through modern training systems and assets. We will improve the provision of our **prevention**, **protection** and **response services** by developing, tracking and allocating skills, capability and experience according to need and risk.

How we will achieve this

Deliver togetherness – We will support London to realise people's ambitions around inclusion and diversity.

Flexible workforce and deployment– According to your needs, we will increase our ability to deliver services flexibly to meet operational demands whilst being flexible to wider social changes.

Enhance workforce modelling – We will better predict and prepare for changes to service delivery requirements.

How we will measure our improvement

- Number of reportable safety events
- Percentage of managers who have completed training against plan
- Pay gaps
 - Staff sickness
 - CommunitySatisfaction Ratings



What you said

"A better understanding of how LFB would react to different types of emergencies. Living in a high-rise building I worry about how the fire brigade are equipped to tackle a fire here."

"Learning from mistakes and investment into better training of fire safety staff needs to be taken very seriously."

Organisational Learning Model – We will improve our ability to learn together and develop so we have the right skills to meet your needs.

Improved training systems and assets – Staff will be equipped with the right skills and career development opportunities to serve you better.

Talent development – We will develop clear career pathways for all our staff to ensure that talent is developed, and we have the right skills for specialist roles.

Staff wellbeing – We will improve staff wellbeing and be inclusive of all diverse needs.

Staff safety– Staff health and safety will be better prioritised, and we will ensure proper measures are in place to support our staff members throughout their careers.

Improved employee experience – We will prioritise interventions based on evidence for all staff, to improve awareness of wider health and wellbeing offerings.

Leadership development – We will deliver a suite of leadership courses for all staff to enhance leadership throughout the organisation.

LEARNING FROM OTHERS: Working together

Commitment 6 We will work together to supply the best possible services to meet your needs

In this commitment, we want to ensure we are working as one Brigade, ending any siloed working.

We want to have a culture that learns from its people and the people it serves. We want to be set up for success by empowering leaders at all levels in the organisation. We want to improve collaboration across all our functions and create effective service delivery. We will deliver services based on outcomes, while keeping our current performance standards. We will learn from our communities and support local leaders to respond effectively to community risk.

What you said

"Put service first."

"Set increasingly higher standards and provide sufficient staffing and resources, both personel and financial, to ensure these."

How we will achieve this

Support the frontline – Our support services will better prioritise the improvements that our frontline staff ask for. This should free up more time for our frontline staff to be focused on delivering our **prevention**, **protection** and **response services** to you.

Improve collaboration – We will work with our partners and other parts of the Greater London Authority to deliver more value and reduce the risk of duplicated effort.

Improve technology to support frontline services – We will streamline our support services to ensure that frontline service delivery of our prevention, protection and response services is optimised.

Support our staff – We will offer a single, easy-to-use staff support system to enable improved staff experience and productivity of our services.



ADDING VALUE: Improving effectiveness

Commitment 7 We will be driven by evidence to give you the value you expect

In this commitment, we respond to Londoners' expectations by improving our efficiency, knowing what works and using your money effectively to improve your safety. We will do this by moving from being very experience-led to becoming more evidence-led.

We want to improve workforce productivity and use this to achieve more efficient and effective use of our resources and risk management.

We also want to drive efficiencies that support value-for-money and enable us to re-invest efforts to enhance the effectiveness of frontline delivery.

How we will achieve this

Measure outcomes – We will be held to account for the value of the services we deliver and quality of our **prevention**, **protection** and **response service** provision.

Agile services that deliver value – We will work with you to identify which **prevention**, **protection** and **response** services have the most impact and offer the most value for money.

What you said

"There should be complete transparency about its resourcing, staff, equipment etc and whether all these needs are being sufficiently met to allow them to carry out their role properly, and to maximise effectiveness."

"Focus services first on those who are most at risk."

How we will measure our improvement

- Number of fire deaths
- Number of fire injuries
- Number of fires
- Accidental fire deaths in the home
 - Community Satisfaction Ratings



ADDING VALUE: Safer future

Commitment 8 We will work with other organisations to secure a safer future for everyone

In this commitment, we want to not just influence partnerships with other organisations but also lead them.

We want to formalise the way we partner with other organisations, such as housing associations, carers' organisations, health and social care providers, day centres and voluntary bodies, so we can easily work with them to improve the safety of the people they support.

We also want to shape policy and improve effectiveness through these partnerships. It is vital we gain an understanding of the built environment and risk across London to support wider societal priorities such as sustainability.

How we will achieve this

Adopt National Operational

Guidance – We will fully integrate national guidance into London Fire Brigade to deliver our services to national standards.

Sharing services and learning – We will work with partners to deliver better outcomes and value across the UK's fire and rescue services.

Net-zero 2030 – We will deliver environmentally sustainable outcomes for London through adjustments to the way we deliver our services.

What you said

"Be as proactive as possible in dealing with situations that confront them arising from poor/bad building and other safety regulations; to challenge these wherever possible."

"Better education is needed on how fire safety ties in within environmental issues."

How we will measure our improvement

- During the first year of the plan we will be developing how we measure the effectiveness of our partnerships and the opportunities for improvement
- Community Satisfaction Ratings





Meeting the Mayor's priorities

We are committed to supporting the priorities of the Mayor of London as outlined in his 2021 manifesto, The London Plan and London's long-term recovery from Covid-19.

In his 2021 manifesto, the Mayor says, "The coming years are going to be dominated by how London responds to the pandemic and the damage it has caused to the city."

We have committed, along with other major London partners, to be an Anchor Institution – an organisation which is committed to driving change and economic recovery for London and Londoners through their procurement, recruitment and presence in London's communities.

We have provided key support for London through the Covid-19 pandemic and will continue to support London in its recovery to be the best place to live and work in the world. For example, London's vibrant night-time economy is being boosted through Mayoral funding to establish Night Time Enterprise Zones. These will encourage more people to use their high streets in the evening. We will work with local authorities and business owners so entertainment venues and restaurants are safe for people to enjoy.



On the next page we explain some of the key ways we are working to support the Mayor and his priorities over the course of this plan.

To support the Mayor's priorities we will:

Be community-focused and service-led to:

- **Build strong and inclusive communities** through better community engagement, putting firefighters at the heart of the communities they serve to promote fairness and equality.
- Make the best use of our fire stations by opening them up to the public, ensuring they are inclusive buildings, where every Londoner feels safe.

Adapt to change and be driven by outcomes to:

- Create a healthy city and narrow social, economic and health inequalities by aiming for 20 per cent of our spend on suppliers to be with black, Asian and ethnically diverse small and medium businesses.
- **Green our response vehicles**, which will include the replacement of officers' cars with an all-electric fleet by 2024.
- Protect global London and its infrastructure to recover from the pandemic by
 preventing disruption and help to protect against further shocks by working with blue
 light partners to reduce the risk presented by marauding terror attacks and other major
 threats to the Capital.

Bring the best people, to work together, to:

- Help young people to flourish with access to support and opportunities by ensuring our cadets are representative of London's diverse communities.
- Provide jobs where Londoners can develop new skills, promoting a fair and inclusive workplace and aiming for 40 per cent of our new firefighters being from black, Asian and other ethnically diverse communities.
- Work together to support the city's recovery from the Covid-19 pandemic and build
 a greener, fairer, safer, and more prosperous city by supporting our communities,
 including those most affected by the virus.

Deliver value and a safer future to:

- **Increase efficiency** by delivering a highly productive fire and rescue service and working as a committed Anchor Institution with the wider London partners to help **reverse the pattern of rising unemployment and reduced economic growth**.
- Support the Mayor's plans to move London **towards a greener future** and net-zero carbon emissions by 2030, this includes plans to **decarbonise our estate**.
- Stand up for London by influencing London's changing built environment and upholding the highest levels of fire safety to support delivery of the affordable homes Londoners need.



Assuring your service

Every Fire and Rescue Service in England must be accountable to the communities they serve.

To do this we must have regard to the Fire and Rescue National Framework for England 2018, when carrying out our functions and publish an annual statement of assurance of compliance.

We are expected to have governance and accountability arrangements in place covering issues such as financial management and transparency, complaints and discipline arrangements, and compliance with the seven principles of public life (sometimes called the Nolan principles).

In demonstrating our accountability to communities for the service we provide, we need to:

- be transparent and accountable to our communities for their decisions and actions;
- provide the opportunity for communities to help to plan their local service through effective consultation and involvement; and
- have scrutiny arrangements in place that reflect the high standard communities expect of us.

The Mayor of London, supported by the Deputy Mayor for Fire and Resilience, holds us to account for our performance and how we are working to ensure the safety of Londoners. The Mayor appoints the Commissioner and agrees the London Fire Brigade budget, in consultation with the London Assembly, and provides oversight of major decisions.

We need to be transparent and accountable to our communities for our decisions and actions.



Fire, Resilience and Emergency Planning Committee

The Fire, Resilience and Emergency Planning (FREP) Committee reviews the London Fire Commissioner's priorities and objectives and makes recommendations on behalf of the London Assembly. The Committee monitors decisions made by the Commissioner and the Deputy Mayor for Fire and Resilience and it uses the London Fire Brigade quarterly performance reports to inform its scrutiny work.

External scrutiny

Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) has statutory responsibility for the inspection of the police forces, and since July 2017, the fire and rescue services of England and Wales.

HMICFRS inspects, monitors and reports on the efficiency and effectiveness of fire and rescue services with the aim of encouraging improvement.

Our most recent inspection report

Over the past two years, London Fire Brigade has been transforming how we work to provide a better service to Londoners. The latest report by HMICFRS highlights that we have more to do despite that progress.

We welcome the report and are committed to delivering their recommendations over the course of this plan.

In 2019 London Fire Brigade welcomed the first inspection report by HMICFRS and accepted all their recommendations. As of July 2022, the Brigade has completed 18 of the 26 recommendations and made many changes to improve the service provided across London and address the causes of concern.

Learning together

We continue to learn from others through high profile public enquiries, such as the Grenfell Tower and the Manchester Arena Attack Inquiries. There has been a drive to deliver the 29 Grenfell Tower Inquiry Phase 1 recommendations, with 26 already completed.

Throughout this plan we will continue to learn from other UK Fire and Rescue Services as well as international partners, to improve our services. This will mean that we may need to adapt this plan in response to further recommendations from major incidents, service reviews, and inspection reports.

Moving forward together

To help us continue our progress, we have set up our own internal service assurance framework which will help assure all community-facing services are delivered to the national standards.

This supports our internal audit arrangements to check the adequacy of our controls, which are provided by The Mayor's Office for Policing and Crime. We have also set up an independent audit committee made up of sector experts who provide us with independent challenge and scrutiny.

As part of this plan, we have worked with community leaders to develop a community forum. This is a group of Londoners who provide their views, life experience and opinions to inform our transformation.

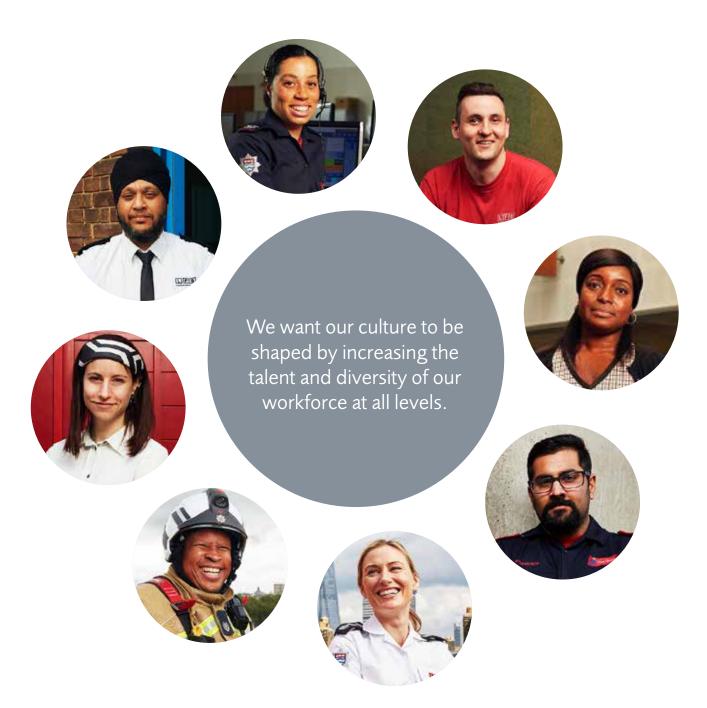




Our culture

In order to serve you better, we want to improve our culture.

In 2021, we launched an organisation-wide independent review into our culture, appointing Nazir Afzal OBE as the Chair of the review. He is looking into several areas, from how we support our newest trainees, to how we support staff who are neurodivergent.





London is home to an increasingly diverse group of people and it is important that, as an organisation, we are representative of the communities we serve and that our services are accessible to all Londoners.

We want our culture to be shaped by increasing the talent and diversity of our workforce at all levels.

We want to represent you and your communities and embrace diversity. This will enable us to be at the centre of your communities, make better decisions, increase public trust, and ensure that every member of staff would recommend working for the Brigade to their family and friends.

It is too early for us to know what the review into our culture will recommend. We look forward to receiving the outcome of the review and commit to addressing its recommendations. We will review and revise this plan and its supporting delivery plan if necessary.

From what we know about ourselves, we expect to have to consider at least the following in relation to both our people and our culture:

• The impact of policies, processes, systems, and ways of working.

- The way in which policies, processes and systems are applied and interpreted by staff.
- The behaviours and decisions of leaders at all levels and the impact they have.
- The impact of individual or group behaviour.
- The impact of team-based customs and traditions across all parts of the Brigade and how we can create solid teams that enable everyone to thrive.
- The impact of barriers to progression, real and perceived.
- The difference in experiences of staff, based on, but not limited to their:
 - age
 - disability
 - gender identity and gender reassignment
 - marriage and civil partnership
 - pregnancy and maternity
 - race
 - religion or belief
 - sex
 - sexual orientation
 - and other forms of difference, including neurodiversity, occupational group and rank.



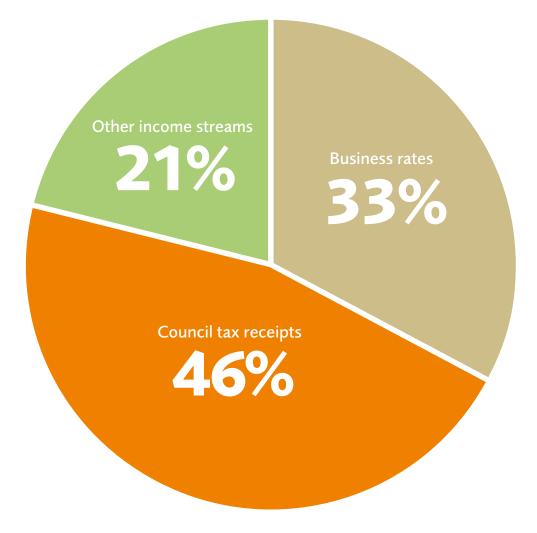
Making the best of our resources

How London Fire Brigade is funded

London Fire Brigade has an annual budget of around £450 million with current reserves of £87.5 million. As one of the Greater London Authority's functional bodies, our core funding is set and approved by the Mayor of London.

These funds are drawn mainly from a combination of business rates, council tax receipts and government grant funding. We also receive funds from a small number of other income streams.





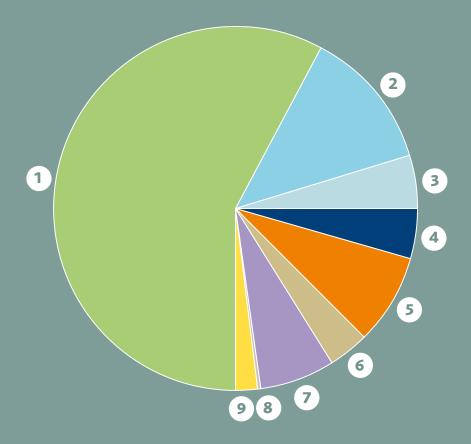
What do I pay for my fire brigade?

In 2022/23 for a Band D property, London Fire Brigade received £56.87, or £1.09 a week.

What does London Fire Brigade use my money for?

We use the money we receive to fund every part of our functions, from fire engines and operational equipment to staff and office costs. The largest part of our budget is spent on salaries and other costs associated with the employment of over 5,800 staff.

The chart below shows a breakdown of our expenditure. Throughout every stage of budgeting we recognise we have a duty to deliver the best possible value for money for you with everything we do.



- 1 Operational staff £275,344m
- **2** Other staff **£63,188m**
- **3** Employee related £24,508m
- **4** Pensions **£21,644m**
- **5** Premises **£44,807m**
- **6** Transport **£17,640m**
- **7** Supplies and services £31,557m
- 8 Third party payments £1,401m
- **9** Capital financing costs £8,453m

Future funding

This plan will be delivered in a challenging financial environment with inflation at a 40 year high. We are already facing a budget gap of £11 million for 2023/24 and this, along with budgetary pressures arising from the Covid-19 pandemic and the price of utilities and fuel, will continue to have an impact on our resources. This means there are uncertainties around our longer-term financial position.

This is an ambitious plan and it is possible we will need to review it as our funding becomes

clearer. We have made significant improvements since our last plan and will continue to seek efficiencies, so that we are delivering good value and are able to use our funding to secure the best outcomes for Londoners. Commitment 7 in this plan describes more about how we intend to achieve this.

We cannot predict long-term future funding, our plan is designed to be adaptable. The scope or timing of initiatives may be revised in response to changing economic circumstances.

Medium-Term Financial Strategy 2022–2025

The Medium-Term Financial Strategy sets out the proposed revenue budget for this financial year (2022/23) and financial forecasts for a further two financial years. The table below sets out a summary of the financial position in each of those years. These figures relate to funding approved

by the Mayor and funding in future years which will be approved through our annual budgeting process. They do not include funding from other streams which make up the final part of our budget. These amounts will not be known until nearer the time.

Budget - Indicative Mayoral Funding

2022/23	2023/24	2024/25
£421.8 million	£435.7 million	£452.8 million

Further information

Further information on all aspects of our income and expenditure is available on our website london-fire.gov.uk under 'Our Decisions – Budget'.



Measuring our improvement

To measure our success, we have identified a core set of performance measures.

These will allow us, the public and other stakeholders to be able to independently assess our progress against the commitments outlined in this plan.

Some of these performance measures haven't changed, some have new targets and some measure new areas of performance. There are more measures of community satisfaction and measures that focus on results.

We have also introduced new measures on training, wellbeing and diversity of our staff. We will retain these measures throughout the life of the plan.

We will publish our targets in advance of each year and let you know how we are performing against them on a regular basis.

We will keep our targets under review and expect them to evolve as we deliver on improvements and face new challenges. We will also use these measures to monitor our performance at a borough level, so that a more localised approach to risk management does not negatively impact the core services we provide.

We have kept our measure of getting a fire engine anywhere in London within 12 minutes, as our proposal to remove it was not supported by those who responded to our consultation. We also intend to maintain our **attendance targets** for the life of the plan. Our full metrics document is available online: https://london-fire.gov.uk/media/6686/crmp-metrics-30-may.pdf

Our attendance targets

We aim:

- To get the first fire engine to an incident Pan-London average of 6 minutes
- To get the second fire engine to an incident Pan-London average of 8 minutes
- To get a fire engine anywhere in London within 10 minutes 90 per cent of the time
- To get a fire engine anywhere in London within 12 minutes 95 per cent of the time

Our performance measures

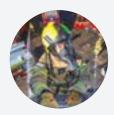
In addition to our four attendance targets on the previous page, we will also use **Community Satisfaction Ratings** to measure how well we are doing across all of our commitments.

We have listed below the further core measures we will use to report on our performance through the life of the plan.



ENGAGING WITH YOU

- Assessment of our impact on communities
- Staff composition (gender, ethnic diversity and people with disabilities)
- Number of triages via our online Home Fire Safety Checker



PROTECTING YOU

- Percentage of firefighters who have received training to respond to a marauding terrorist incident
- Ratio of high-risk fire safety audits completed
- Alleged fire risks addressed within three hours
- Number of fires and casualties from fires
- Station staff time spent on prevention activity
- Station staff time spent on protection activity
- Percentage of high-risk home fire safety visits within target
- False alarms due to Automatic Fire Alarms (AFAs) in non-domestic building



LEARNING FROM OTHERS

- Number of reportable safety events
- Percentage of managers who have completed training against plan
- Pay gaps reducing different rates of pay between different groups of staff
- Staff sickness
- Staff wellbeing



ADDING VALUE

- Number of fire deaths (five year rolling average)
- Number of fire injuries (five year rolling average)
- Number of fires Flat/House and bungalow/Care home
- Accidental fire deaths in the home



Help shape our services for your community

What is the Community Forum? It is a group of people who provide their views, life experience and opinions to inform our transformation – helping us to put London's communities at the heart of everything we do.



As a member of the Community Forum, you will be able to:

- Act as a critical friend to the Brigade.
- Act as a voice for your local community.
- Help shape how the Brigade is run.
- Help shape how we can engage better with people and communities.
- Develop personal skills and meet new people.
- Gain knowledge and understanding of how the Brigade works.

How can you get involved?

Sign up using the link below and express your interest. We look forward to hearing from you:

london-fire.gov.uk/about-us/what-we-do/community-engagement-your-london-fire-brigade/community-forum/

Further reading

Delivery Plan 2023-29

https://london-fire.gov.uk/media/6685/crmp-delivery-plan-30-may.pdf

This supporting document outlines the key outcomes for each programme and the projects and initiatives contained within each commitment.

How we measure ourselves

https://london-fire.gov.uk/media/6686/crmp-metrics-30-may.pdf

This supporting document has our key performance indicators which will help us measure our success as we deliver our plan.



If you require further information about London Fire Brigade and our plan to keep London safe, or if you would like a version of the plan in a different format or language, please contact us: consultation@london-fire.gov.uk





London Fire Brigade Headquarters 3rd Floor, 169 Union Street London SE1 OLL T 020 8555 1200 x 30000 F 020 7960 3600 E andy.roe@london-fire.gov.uk www.london-fire.gov.uk

Andy Roe London Fire Commissioner

MD3051 Appendix 2

To Sadiq Khan Mayor of London The London Fire Commissioner is the fire and rescue authority for London

Date: 6 October 2022

Ref.

Dear Mayor

Request for Consent to Provide National Framework Document to the London Assembly's Fire, Resilience and Emergency Planning Committee: Community Risk Management Plan

In accordance with the London Fire Commissioner Governance Direction 2018, I write to seek your consent to provide a copy of the draft Community Risk Management Plan, which I am required to prepare in accordance with the National Framework for the fire and rescue service in England, to the London Assembly's Fire, Resilience and Emergency Planning Committee. I am requesting consent to provide the document so that the Committee may undertake its statutory duty to review the documents and make a report or recommendations to you.

Paragraph 1.1 (b) of the London Fire Commissioner Governance Direction 2018, requires the Commissioner to seek the Mayor's prior "[a] approval of the final proposed text of the draft London Safety Plan (or any revision of it) for the purposes of sending it to the Assembly under section 327G(2) of the Greater London Authority (GLA) Act 1999". Paragraph 6.1 (b) further states that, "London Safety Plan" refers to any document which is prepared and published by the Commissioner in accordance with the Fire and Rescue National Framework and which contains the matters described in section 327G(1)(a) and/ or (b) of the GLA Act 1999."

Paragraph 3.1 of the direction further requires the Commissioner to consult the Deputy Mayor, "as far as practicable in the circumstances before a decision on any of the following is taken: [a] Anything that requires the consent of the Mayor under Part 1 of this Direction. The Deputy Mayor was consulted on the Community Risk Management Plan at her Fire and Resilience Board on 7 September 2022.

I look forward to receiving your response.

Andy Roe

Yours sincere

London Fire Commissioner

MAYOR OF LONDON

Date: 7 October 2022

MD3051 Appendix 3

Andy Roe

London Fire Commissioner 169 Union Street London SE1 OLL

Dear Andy,

Request for Consent to Provide National Framework Document to the London Assembly's Fire, Resilience and Emergency Planning Committee: Community Risk Management Plan

Thank you for your letter of 6 October, sharing your proposed Community Risk Management Plan (CRMP), produced in line with the requirements of the Fire and Rescue National Framework for England.

This letter confirms my consent for this document to be shared with the London Assembly's Fire, Resilience and Emergency Planning Committee, as required by the Greater London Authority Act 1999 and London Fire Commissioner Governance Direction 2018.

Once the Committee has considered these documents and shared its views with me, officers will support you and your team in producing the final version of the CRMP. I will then make a further decision on the publication of the CRMP at your request.

Yours sincerely,

Sadiq Khan

Mayor of London





Community Risk Management Plan 2023: *Your London Fire Brigade*

Report to: Date:

Commissioner's Board 7 September 2022 Deputy Mayor's Fire and Resilience Board 7 September 2022

London Fire Commissioner

Report by:

Susan Ellison-Bunce, Assistant Director Strategic Planning

Report classification:

For decision

For publication

PART ONE

Non-confidential facts and advice to the decision-maker

Executive Summary

Your London Fire Brigade is the London Fire Commissioner's Integrated Risk Management Plan (IRMP) as required by the Government's Fire and Rescue National Framework for England. In line with guidance from the National Fire Chiefs' Council, these are now generically referred to as Community Risk Management Plans.

Public consultation on the draft Plan was undertaken during June and July.

This report considers the results of consultation, outlines the responses to the key points and themes raised during consultation and presents the final amended version of the Plan for approval.

Proposed decision – For the Deputy Mayor

That the Deputy Mayor has considered the attached report prior to the London Fire Commissioner approving the decisions set out below.

Proposed decision – the London Fire Commissioner

That the London Fire Commissioner:

1. having noted and considered the consultation feedback as summarised in this report in sections 2, 3 and 4, and the corresponding appendices, and agrees that the draft proposed CRMP be sent to the Deputy Mayor for consultation prior to seeking the Mayor's approval to provide it to the Assembly for consideration in accordance with section 327G(2) of the Greater London Authority Act 1999.

1 Introduction and background

- 1.1 The Fire and Rescue National Framework for England requires the London Fire Commissioner (LFC) to produce an Integrated Risk Management Plan (IRMP). The Framework states that an IRMP must:
 - reflect up to date risk analyses including an assessment of all foreseeable fire and rescue related risks that could affect the area of the authority;
 - demonstrate how prevention, protection and response activities will best be used to
 prevent fire and other incidents and mitigate the impact of identified risks on the
 community, through authorities working either individually or collectively, in a way that
 makes best use of available resources;

- outline required service delivery outcomes including the allocation of resources for the mitigation of risks;
- set out London Fire Brigade's (LFB) 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;
- cover at least a three-year time span and be reviewed and revised as often as it is necessary to ensure that the authority can deliver the requirements set out in this Framework;
- reflect effective consultation throughout its development and at all review stages with the community, LFB's workforce and representative bodies and partners; and
- be easily accessible and publicly available.
- 1.2 The IRMP for the LFC has previously been known as the London Safety Plan (LSP). However, in line with guidance from the National Fire Chiefs' Council and most other fire and rescue services, London Fire Brigade is now referring to the IRMP as a Community Risk Management Plan (CRMP). The LFC has decided that his first CRMP will be called *Your London Fire Brigade*.
- 1.3 The Greater London Authority Act 1999 (GLA Act) provides that the LFC must, before publishing a document required to be produced under the Fire and Rescue National Framework for England or any revision to it, send a copy of the document or revision in draft to the Mayor and the Assembly and may not publish the document or any revision to it unless the Assembly has had an opportunity to review the draft document or revision, make a report on it to the Mayor and the Mayor has approved the draft document or revision. In addition, the Mayor's London Fire Commissioner Governance Direction 2018 (Mayoral Decision 22602) requires that the LFC consult the Deputy Mayor for Fire and Resilience about proposals requiring Mayoral approval.
- 1.4 A draft CRMP was approved by the LFC (LFC-0704-CRMP) on 1st June for public consultation. This report provides an update on the communication, consultation and engagement activity on the draft Plan. It sets out the results of consultation and the themes which arose, providing a response to the points raised. Some amendments to the draft Plan are proposed and a revised version of the Plan is at Appendix 1.

2 Communication and consultation on the draft Plan

Overview

- 2.1 Consultation started on 30 May and closed on 25 July, providing a consultation period of eight weeks. The aims of the consultation were to seek as many views as possible from residents, community groups, LFB staff, organisations and businesses on the detailed proposals in the draft Plan to inform the final content of the Plan and to meet the requirements of the National Framework to consult on integrated risk management plans. More detail about the approach to consultation is provided in Appendix 2.
- 2.2 An independent analysis of the results from the consultation was produced by TONIC and is provided at Appendix 3.
- 2.3 The key areas focused on in the consultation were the proposed actions that we will take to address the Assessment of Risk (our assessment of risk in London), the measures we will use to assess our success, the extent to which people feel the actions will reduce risk and the extent to which they would like us to undertake further engagement on proposals in the future.
- 2.4 An earlier consultation in September and October of 2021 on both the strategic intent which

underpins the CRMP and the Assessment of Risk (AoR) had informed the content of the draft Plan.

- 2.5 In addition to the CRMP itself, the following documentation was made available to provide further information to consultees:
 - Delivery Plan 2023-2029 this provided more detail about the actions in the Plan
 - Measuring Our Success this provided more detail about the Performance Measures
 - Assessment of Risk the latest version, updated in response to the consultation in 2021
 - Assessment of Risk covering report this explained how the Assessment was amended
 - Equalities Impact Assessment this considered the equalities impact of the CRMP
- 2.6 No further information was requested by consultees.
- 2.7 Respondents to the consultation were encouraged to respond using an online questionnaire. This consisted of a series of 'closed' questions (where respondents were given a series of statements and a range of answers to choose from) and 'open' questions (where respondents were asked to write their views, ideas, suggestions and experiences in response to specific questions). Respondents were guided towards the following channels to respond to the consultation:
 - Talk London: An online survey platform for the public
 - Tonic: An online survey platform for LFB staff and organisations
 - Paper survey: Paper-based versions of the survey, primarily for the public
 - Email: A dedicated LFB email address allowing anyone to respond by email or letter instead
 of the survey
 - A freephone number was also set up to enable people to request a printed copy of the consultation document, or in another format or language

Learning from the 2021 consultation

- 2.8 Officers undertook to learn lessons from the CRMP consultation in 2021.
- 2.9 In the 2021 consultation we set out eight proposals for change to our approach in delivering services to our communities. We asked people to state how important they thought each statement was in enabling LFB to deliver a positive impact in the community. The majority felt that it was important for LFB services to be:
 - Delivered by the right people with the right skills to the highest standard (88 per cent very,
 10 per cent fairly important)
 - Easy to access whether in person or online (75 per cent very, 20 per cent fairly important)
 - Joined-up so that people get all the services they need from LFB regardless of how they first ask for help (72 per cent very, 23 per cent fairly important)
 - Flexible knowing London is always changing whether in size, its climate, its buildings or the incidents LFB attend (69 per cent very, 26 per cent fairly important)
 - Offering good value based on what communities need from LFB, having listened to them
 and considered all the data the Brigade has on the incidents that are most likely to occur
 and how they might prevent them (65 per cent very, 29 per cent fairly important)
 - Locally planned and delivered from their buildings and their people in the community (64
 per cent very, 25 per cent fairly important)
 - A leader in the delivery of services focused on the people that may need them and benefit society more widely (61 per cent very, 28 per cent fairly important)
 - Measured for the positive outcome they have on people's daily lives (57 per cent very, 32 per cent fairly important)
- 2.10 The majority of respondents also stated they were very confident (41 per cent) or fairly confident (42 cent) that the goals set out by the Brigade were the right approach to enable the

Brigade to understand and respond to the needs of London's diverse communities. In addition, people told us that they are interested in:

- Our regulatory work and how we hold building owners and decision-makers to account
- How we ensure we are inclusive and how we engage with under-represented communities
- Making sure our communication is accessible to all our communities
- 2.11 We received a number of comments in relation to the Assessment of Risk and made several amendments to the Assessment to incorporate those views. More detail about those responses and resultant changes were reported to the Commissioner's Board and the Deputy Mayor's Fire and Resilience Board in May, alongside the revised Assessment of Risk.

Gap Analysis

- 2.12 A desktop gap analysis of responses to the previous consultation was undertaken to identify gaps in responses from those who have particular protected characteristics. The 2021 consultation showed a low response from the following communities:
 - People who are unemployed or on low incomes
 - People with disabilities not in employment
 - People from Black, Asian and minority communities
 - People looking after children, who are not in employment
 - People who are in social housing
- 2.13 The gap analysis was used to underpin targeted engagement in the consultation on the full Plan. In addition, officers targeted those who live in high-rise properties, as there had been a number of recent high-profile fires in this type of accommodation and our subsequent work with those communities indicated concerns and interest in our plans amongst this group.
- 2.14 Some respondents to the previous consultation had challenged the questions that were used. Some people felt them to be expressed in "management speak" and others felt that the questions were "leading" and bound to be supported. Officers worked with colleagues at Talk London to make the questions for the consultation on the full Plan as meaningful as possible. It should be noted though, that as there were not considered to be any particularly contentious proposals in the Plan, it was thought likely that they would be largely supported by the public
- 2.15 Furthermore, as the analysis later in this report shows, there were proposals that were less well supported than others. It was therefore possible to compare comparative differences between the level of support shown to specific questions and this has informed how we have used the feedback we have received.

YouGov survey

- 2.16 Historically, response rates to Brigade consultations have been relatively low, although this is generally in line with other public sector consultation rates. Elsewhere, this report summarises the steps that were taken to increase the response rate on this occasion. However, to provide additional reassurance of the validity of the results received, officers commissioned a YouGov survey using the quantitative questions from the public consultation. The results of that survey are provided at Appendix 4.
- 2.17 An analysis of the response rates to the full survey showed that 1,339 respondents to the survey responded as a member of the public. This equates to 0.02% of the London population (from a total of 7,203,900 people aged 15+, from the 2021 Census data). Using a sample size calculator, this response size provides a 99% confidence level at a 3% margin of error, this would be seen as a good sample size at headline level for research.
- 2.18 However, some groups will be under-represented and some over-represented in this cohort

- and, more importantly, the public consultation open access process means that the respondents are a self-selecting sample and therefore it is not possible to say that this is representative of the general population and therefore results are not considered to be generalisable to the entire population of London.
- 2.19 We received responses from a much smaller percentage of people aged under 25 compared to the London population. However, the other age groups are either fairly close or over represented. The ethnicity data in the survey responses varied across platforms and the 2021 Census data on ethnicity is not due to be published until October this year, so it is not possible to reach a view on the extent to which the response rates were representative.
- 2.20 Officers have used the YouGov results to identify any quantitative questions where any ethnic group or people aged under 25 showed less than 70 per cent support for our proposals.
- 2.21 There was no difference significant enough for officers to feel it necessary to make a specific change to the Plan, however, this information will be provided to borough commanders so that they can take this into account as they work with their communities to develop local plans. with

Community engagement approach

- 2.22 The promotion of the consultation amongst communities was in two parts. There was a central strand of work with the borough commanders to support their direct engagement with their local communities, supplemented by work of the community engagement team to target the under-represented communities from the Autumn 2021 consultation as listed above. This included holding some co-produced focus groups.
- 2.23 As well as getting important insight from communities to help shape the CRMP, this approach enabled LFB to continue to build relationships and trust as a foundation for future engagement and to increase the confidence of borough commanders to operate in a different way.

Borough Commander led events

- 2.24 The Community Engagement team provided borough commanders with support to design programmes of direct engagement with their local communities. This includes providing them with physical resources for their events and guidance and support on effective engagement.
- 2.25 Coaching was provided on how to run successful events, speak meaningfully with the public about the consultation and build on community relationships.
- 2.26 Over 200 events were attended or held by LFB across all London Boroughs over the consultation period. These included fire station open days, events and meetings run by local charities and faith groups, festivals and other community events. The estimated overall footfall of these was over 200,000 people (this includes 120,000 at the Lambeth Country Show), the level of detail of engagement was tailored to the specifics of each event.
- 2.27 The objective of these events was to build relationships within local communities, have a visible presence within the community and encourage people to respond to the public consultation.

Targeting underrepresented groups

- 2.28 The community engagement team carried out a programme of work targeting key groups who had been underrepresented in response to the Autumn 2021 consultation, including seldom heard and underrepresented communities.
- 2.29 Direct contact was made with the following organisations, informing them of the consultation and how to take part:

- deafPLUS
- Trellick Tower Tenants and Residents Association (TRA)
- Poplar HARCA TRA
- Silchester Estate TRA
- Friends in High Places
- Pepys Estate TRA
- Lancaster West (Grenfell Tower Estate) TRA
- East London Mosque
- West London Al-Manaar Muslim Cultural Heritage Centre
- The LFB Community Forum Steering Committee
- 2.30 As well as generating consultation responses this helped generate engagement opportunities such as a bespoke event for Muslim women at the East London Mosque on 20 June 2022.

Co-producing the focus groups

- 2.31 A focus group is a research method that brings together a small group of people to answer questions in a moderated setting. The group is chosen due to predefined demographic traits and the questions are designed to shed light on a topic of interest. Focus groups are a type of qualitative research.
- 2.32 The community engagement team also ran three focus groups with the following organisations representing some of those underrepresented groups.
 - Certitude London's leading adult social care provider for people with learning disabilities, autism and mental health needs offering support to 1,800 people in 17 London boroughs.
 - Hoarding UK: the only UK-wide charity dedicated to supporting people affected by hoarding behaviours.
 - Elop: a holistic lesbian and gay organisation that offers a range of social, emotional and support services to LGBT communities pan-London.
- 2.33 Each focus group was shown a presentation of the CRMP consultation. The presentation was adapted into a speech and language approved photo symbol easy read version for the sessions with Certitude and Hoarding UK to help those attending to fully engage with the process.
- 2.34 The focus groups were independently assembled by the partner organisations, who managed the invitations and sign-ups. Those who attended were not known to the LFB and had not been involved in any of our previous consultation or engagement work. Participation in each group was as follows:
 - Certitude: Session held on 21 June 2022 at the community room at Hammersmith Fire station. Six people attended who registered their interest independently through Certitude. The group was for people with learning disabilities and/or autism.
 - Hoarding UK: Session held on 12 July 2022 on Zoom (at the request of Hoarding UK). Eight people who identify as having hoarding behaviour attended.
 - Elop: Session held on 13 July 2022 on Zoom (at the request of the group) 12 people from the LGBT+ community attended.
- 2.35 The major themes that came up during the focus groups were as follows:
 - The need to understand communities in relation to their access to the LFB and their risk to fires. This was particularly relevant to those with learning disabilities, autism, and those with hoarding behaviours.
 - Communities raised specific risks relating to their disability/ neurodiversity.

- Overall, attendees felt confident that the CRMP would help London to be a safer city over the coming years.
- Attendees were positive about the general work of the LFB.
- 2.36 Officers are of the opinion that the proposals within the CRMP are sufficient to address the issues raised by those who attended the focus groups, so no specific amendments are recommended to the Plan. However, the insights and views from these sessions will be shared with borough commanders, as it will be important that we listen to and take account of the specic needs of these communities when developing our local plans.

Consultation accreditation

- 2.37 The Consultation Institute, an independent body of consultation specialists, has been carrying out a Full Compliance Assessment of the CRMP consultation against their code of best practice. This has involved a continuous dialogue with an assigned advisor during the development and delivery of the consultation and assessments at key points during the process by another independent assessor. The key points are:
 - Scoping document sign-off
 - Project Plan sign off
 - Mid-consultation Review
 - Closing date Review and Analysis plan approval
 - Analysis and Report sign-off
- 2.38 The Consultation Institute signed off the first four stages of the consultation. The assessment of the fifth stage is underway and officers expect to have the result of that work within the next two weeks. The cost of the full compliance assessment is £22,500.

Costs of consultation

2.39 Excluding the cost of officer time, the cost of the consultation that have been confirmed to date are set out in the table below. Officers need to confirm whether or not there are any further items to be included in the overall costs and will report back if this total needs to be amended.

	Cost (£) excl. VAT
Public meeting materials	£6,103
Printing of the draft LSP5 and consultation questionnaire	£2,797
Consultation analysis and second consultation platform (Tonic)	£19,250
Consultation accreditation (Consultation Institute)	£22,500
Total	£50,650

3 Responses to the survey

3.1 The consultation closed at midnight on 25 July. After the deadline, responses were received from the Fire, Resilience and Emergency Planning Committee, the Fire Brigade's Union and the GMB. These responses have been included within the analysis of written responses from organisations set out later in this report and the FBU's response was received in time for it to be included in the analysis undertaken by TONIC. No other responses were received after the

- closing date.
- 3.2 2,239 responses to the consultation questionnaire were received, with 1,339 (60%) from members of the public, 837 (37%) from London Fire Brigade staff, 48 (2%) who preferred not to say and 17 (1%) on behalf of organisations.
- 3.3 A total of 907 responses were received via LFB's Talk London online survey platform, 1,064 via TONIC's online survey platform, and 259 on paper survey forms. There were also 11 freeform email responses received from organisations and politicians.
- 3.4 Officers had intended to begin a separate consultation on a new approach to determining the location of aerial appliances. This has been postponed, pending further work to develop options. However, in some cases, respondents had heard that the location of aerials is under review and provided feedback in relation to that alongside their views on the CRMP. The TONIC report includes a section on these responses but they are not referenced in this report. The responses received will be taken into account as the more detailed options are developed. They will be considered more formally, alongside any additional consultation outcomes and reported at a later date.

Consultation outcomes

- 3.5 In summarising the views of consultees on the draft CRMP, officers have taken into account:
 - quantitative outcomes from the answers to consultation questions;
 - the qualitative comments supplied in response to consultation questions;
 - the comments in other written (letter/email) responses; and
 - the comments raised in the focus group meetings.
- 3.6 The analysis and responses to points made during consultation is collated under the main consultation areas as follows:
 - The Assessment of Risk (questions 1, 2)
 - The eight commitments (questions 3 10)
 - Allocation of resources to address risk (questions 11, 12)
 - Actions to improve building safety (questions 13, 14)
 - Respond to the needs of all communities and strengthen equality and diversity in the Brigade (questions 15, 16)
 - Performance measures, including attendance measures (questions 17 21)
 - Improving trust (question 22)
 - Other views on the issues raised in the consultation (question 23)
- 3.7 In the sections which follow there is a general introduction outlining the overall questionnaire responses (e.g. percentage in support of a proposal) together with any key issues highlighted by respondents (from comments made as part of the questionnaire, a written response and/or in a focus group) and officers' response to those points. Each section ends by outlining any amendments to the content of the Plan compared with the consultation draft and any further actions officers intend to take in response.

The Assessment of Risk

- 3.8 Respondents were asked to what extent they agreed or disagreed that the Assessment of Risk captured the risks that London Fire Brigade should respond to. The majority of members of the public (89 per cent), LFB staff (85 per cent), and respondents who preferred not to say (81per cent) were in agreement with the statement.
- 3.9 Question 2 asked respondents to suggest any additional areas of risk they felt should be included.

- 3.10 Many of the additional risks put forward were already included in the Assessment, either expressly (e.g. houseboat fire) or by implication (e.g. industrial accidents, which are broken down and included by their cause or severity).
- 3.11 Risks that were not included and officers' responses to the suggestions are listed below:

Issue	Response
Road conditions/blocked access	This is not a risk that we would respond to and so is not included. The risks that could arise from this are already included (e.g. road traffic accident).
Cyber attack	This is not a risk that we would respond to. The risks that could arise from this are already included (e.g. civil unrest).
Food and water shortages	This is not a risk that we would respond to. The risks that could arise from this are already included (e.g. civil unrest).
Droughts	This is not a risk that we would respond to. We have continuity plans in place so that we are able to continue to provide a response in circumstances such as a water shortage.
Evacuation plans	This is not a risk we would respond to. The responsibility for preparing evacuation plans lies with the responsible person for that building.
Damage caused by strong winds	This is not a risk that we would respond to. The risks that could arise from this are already included (e.g. building collapse).
Internal risks (such as budget cuts)	We maintain an internal risk register and have arrangements in place to manage risks such as budget cuts.
Preparation for fuel crises	This is not a risk that we would respond to. We have continuity plans in place so that we are able to continue to provide a response in circumstances such as a fuel shortage.

3.12 Officers do not propose to make amendments to the Assessment of Risk at this time. However, the annual review of the Assessment is now under way and officers will consider how the presentation of risks could be improved to aid their visibility and understanding by the public.

The eight commitments

Commitment 1: We will work with you to provide localised services that meet your needs

- 3.13 There were four questions about this commitment. The majority of members of the public (>90 per cent), LFB staff (>85 per cent), and respondents who preferred not to say what respondent type they were (>70 per cent) felt our proposals were important.
- 3.14 Officers do not recommend any changes to the proposals under this commitment.
 - Commitment 2: We will make it easy for you to access our services
- 3.15 There were four questions about this commitment. The majority of members of the public (>88 per cent), LFB staff (>90 per cent), and respondents who preferred not to say what respondent type they were (>71 per cent) felt our proposals to *Provide online resources that allow people to get answers to* questions and find out more about services and to *Develop a range of ways for Londoners to access non-emergency advice* were important.
- 3.16 Our proposal to *Make fire stations welcoming, accessible places where people can come for guidance and support* received less support, (public >76 per cent, LFB staff >77 per cent, and respondents who preferred not to say what respondent type they were >60 per cent) although a majority were still supportive.

- 3.17 Our proposal to *Collect information from social media to understand Londoners' views of services to help improve them* received the least support of our proposals under this commitment, although a majority of respondents supported it overall (public >67 per cent, LFB staff >67 per cent, and respondents who preferred not to say what respondent type they were >46 per cent).
- 3.18 Officers do not recommend any changes to the proposals under this commitment.

 Commitment 3: We will adapt our services as your needs change
- 3.19 There were three questions about this commitment. The majority of members of the public (>92 per cent), LFB staff (>90 per cent), and respondents who preferred not to say what respondent type they were (>75 per cent) felt our proposals were important.
- 3.20 Officers do not recommend any changes to the proposals under this commitment.

 Commitment 4: We will design services around your needs and concerns
- 3.21 There were four questions about this commitment. The majority of members of the public (>88 per cent), LFB staff (>88 per cent), and respondents who preferred not to say what respondent type they were (>73 per cent) felt our proposals to Ensure LFB staff can easily identify needs of people using services and offer the right services and solutions and to Provide support to people directly involved in an incident and others affected by it, to support recovery were important.
- 3.22 Our proposal to *Increase awareness of services offered and ways to reach LFB* received slightly less support, although a majority of respondents supported it overall (public >88 per cent, LFB staff >87 per cent, and respondents who preferred not to say what respondent type they were >63 per cent).
- 3.23 Our proposal to *Provide live updates on incidents to London's communities* received the least support of our proposals under this commitment, although a majority of respondents supported it overall (public >82 per cent, LFB staff >74 per cent, and respondents who preferred not to say what respondent type they were >58 per cent).
- 3.24 Officers do not recommend any changes to the proposals under this commitment.

 Commitment 5: We will enable our people to be the best they can be to serve you better
- 3.25 There were varying degrees of support in response to the five proposals under this commitment.
- 3.26 The proposal to *Prioritise staff health and safety and support staff throughout their careers* received strong support from all groups of respondents (public 95 per cent, LFB staff 97 per cent and respondents who preferred not to say what respondent type they were 83 per cent).
- 3.27 The other four proposals received support from the public (>83 per cent) and LFB staff (>79 per cent) but received less support from respondents who preferred not to say what respondent types they were. The proposal to *Improve recruitment and retention to ensure workforce reflects the city's diversity* was only thought to be important by 50 per cent of these respondents and the proposal to *Increase talent and diversity of our workforce to help shape LFB culture* was only thought to be important by 52 per cent of them.
- 3.28 Officers do not recommend any changes to the proposals under this commitment.

 Commitment 6: We will work together to provide the best possible services to meet your needs and Commitment 7: We will be driven by evidence to give you the value you expect
- 3.29 The three questions in this section covered the proposals under both of these commitments. Questions relating to the proposals under these commitments were merged to aid understanding.
- 3.30 There were three questions about these commitments. The majority of members of the public

- (>88 per cent), LFB staff (>89 per cent), and respondents who preferred not to say what respondent type they were (>73 per cent) felt our proposals were important.
- 3.31 Officers do not recommend any changes to the proposals under this commitment.

 Commitment 8: We will work with other organisations to secure a safer future for everyone
- 3.32 There were varying degrees of support in response to the four questions under this commitment.
- 3.33 The proposal to *Work with other fire and rescue services to identify good practice and introduce consistent ways of* received strong support from all groups of respondents (public 93 per cent, LFB staff 92 per cent and respondents who preferred not to say what respondent type they were 75 per cent).
- 3.34 The other three proposals received widespread support from the public (>81 per cent) and LFB staff (>73 per cent), but received less support from respondents who preferred not to say what respondent types they were. The proposal to *Evaluate which services deliver the most and least value to prioritise resources that make people safest* was only thought to be important by 69 per cent of these respondents. The proposal to *Work with other organisations to deliver wider benefits to communities even outside of usual responsibilities* was thought to be important by only 50 per cent of those respondents and 40 per cent thought it not important. Our proposal to *Deliver services in an environmentally sustainable way* was only thought to be important by 60 per cent of those respondents.
- 3.35 Officers do not recommend any changes to the proposals under this commitment.

Allocation of resources to address risk

- 3.36 Questions 11 asked about the extent to which people were satisfied with the proposed allocation of resources to reduce risk in London and question 12 provided an opportunity for respondents to add any other comment in support of their answer to question 11.
- 3.37 More than half of members of the public (69 per cent) LFB staff (55 per cent), and respondents who preferred not to say what respondent type they were (56 per cent) felt satisfied that the proposed allocation of resources would address risks in London. Fewer than 15% of each group said that they were dissatisfied with this.
- 3.38 695 people provided further commentary in response to question 12. Most of the respondents to this question were members of the public (473, 68 per cent) and 222 (32 per cent) being Fire Brigade staff. The themes raised were as follows.
- 3.39 In general, among the 695 who responded to this question, members of the public were much more likely to express the desire for an increase in fire stations and slightly more likely to desire an increase in fire engines and equipment, while Brigade staff were more likely to desire an increase in staff numbers, investment and training.
- 3.40 Staff were also much more likely, at a ratio of five to one, to state that they felt the current service was overstretched and unable to cope with the demands placed upon it, with some highlighting the effects of previous cutbacks, as well as effects on staff morale and mental health.
- 3.41 Although the Plan confirms our intention to maintain the current number of fire stations, appliances and firefighters, around 7 per cent still believed that there would be reductions and that this would be detrimental to the protection offered to London. There were also many respondents who believed that the current level of resource would be insufficient to meet rising demand from population growth, building safety work and to deal with the impact of increasing traffic congestion.

- 3.42 There were a small number who felt they would have needed to have had much more information made available to them in order to properly answer the question in an informed and useful way, including having access to data on how response times had been affected by previous changes to resources and resource allocation, such as fire station closures, removal of units, and the moving of units and other equipment from one station to another.
- 3.43 Officers did not receive specific requests from respondents during the consultation for this additional information. However, recent attendance performance was included within the supporting document: Measuring Our Success 2023 2029. It is also available on the London Datastore, with the relevant report being returned as the first search result from a Google search for "London Fire Brigade attendance times".
- 3.44 Whilst these views of concern and fear for the future, as well as those expressing the wish for increases in investment and staff numbers, featured prominently within the responses to question 12, they still represented a minority of responses as a whole.
- 3.45 Officers do not recommend any changes to the allocation of resources as a result of the consultation.

Actions to improve building safety

- 3.46 Questions 13 asked about the extent to which people were satisfied that the proposals would improve fire safety in buildings and question 14 provided an opportunity for them to add any other comment in support of their answer to question 13.
- 3.47 Question 13 was answered by 1,969 respondents 1,159 members of the public, 762 Brigade staff, and 48 who preferred not to say.
- 3.48 Most members of the public (75 per cent), LFB staff (62 per cent), and respondents who preferred not to say what respondent type they were (56 per cent) felt satisfied that the proposed improvements to fire safety in buildings will address risk in London. Fewer than 15 per cent of each group said that they were dissatisfied with this.
- 3.49 566 respondents chose to provide further information in response to question 14, with 399 (70 per cent) being members of the public and 167 (30 per cent) being staff. The themes raised were as follows.
- 3.50 The most common single theme highlighted by respondents was one of support for the proposed improvements to building safety standards, with around one in five of the public who responded to this question and one in ten of Brigade staff who responded to this question stating that they felt the planned changes would contribute a major benefit in addressing fire risk and prevention and that it is crucial the changes are implemented promptly.
- 3.51 There were many concerns that the Brigade's current and future legislative powers may not be strong enough to bring about meaningful change; questions around the levels of cooperation and support that could be expected from landlords, business owners, councils and property developers; and questions about the capacity and capability of the available resource for this work.
- 3.52 There was some concern that fire safety tasks were not suited to firefighters and some encouraged the creation of dedicated fire safety teams. Some also felt that the issue of inspections, legislation and enforcement was a job that existed outside the LFB's remit and that it would be one best undertaken by the creation of a dedicated outside agency.
- 3.53 Some respondents felt that safety standards in high-rise buildings were not given enough priority in the plan, some expressing concerns that dangerous cladding and other flammable materials were still present in residential buildings.
- 3.54 Officers welcome the level of support shown for the proposals and note the concerns

expressed. Officers will continue to work with the new building safety regulator to seek to address these concerns. New sections and additional information on our role in fire safety and how our work aims to reduce risk in London have been added to the Plan in response to the points raised.

Responding to the needs of all communities

- 3.55 There were three parts to question 15.
- 3.56 The first asked the extent to which respondents agreed that that the Plan would enable the Brigade to provide services that respond to the needs of all communities. This was answered by 1,976 respondents 1,172 members of the public, 756 Fire Brigade staff, and 48 who preferred not to say. Most members of the public (82 per cent) and LFB staff (77 per cent) felt that the plan will enable LFB to provide services that respond to the needs of all communities. Nearly half of respondents who preferred not to say what respondent type they were (48 per cent) agreed with this, whilst 27 per cent disagreed.
- 3.57 The second part of the question asked how much respondents felt the Plan will strengthen LFB leadership on equality and diversity.
- 3.58 This question was answered by 1,967 respondents 1,153 members of the public, 756 Fire Brigade staff, and 48 who preferred not to say. The majority of members of the public (71 per cent) and LFB staff (67 per cent) felt that the plan will strengthen LFB leadership on equality and diversity. However, only a third of respondents who preferred not to say what respondent type they were (33 per cent) agreed with this and 42 per cent disagreed.
- 3.59 The third part of the question asked how much respondents felt the Plan will result in a workforce that reflects the diversity of London.
- 3.60 This question was answered by 1,969 respondents 1,165 members of the public, 756 Fire Brigade staff, and 48 who preferred not the say. The majority of members of the public (73 per cent) and LFB staff (63 per cent) felt that the plan will achieve a workforce that reflects the diversity of London. Around a third of respondents who preferred not to say what respondent type they were agreed (35 per cent) with this and 38 per cent disagreed.
- 3.61 Question 16 asked respondents for their ideas about what else the Brigade could do to understand and work with communities to make them feel safer.
- 3.62 Primarily, respondents encouraged more development of open days, events and outreach programs that increased the level of connection and interaction between the London Fire Brigade and the communities it serves, particularly in using schools, places of worship, community centres and notable individuals.
- 3.63 Some stressed the need to advertise these events widely and in a timely manner, and a few respondents also stated that they felt fire stations were not seen as being as approachable as other emergency services There were ideas such as creating "shop front" offices in the high street and the creation of a non-emergency number, which is included as a proposal within the Plan.
- 3.64 Regarding diversity, there were some who felt that within the Brigade those at management level were not representative of the ethnic spectrum of the communities they served, while a significant number of respondents expressed concern that the push to meet diversity quotas among frontline workers may have had compromising effects on the quality of service and protection they received. They stated that the best way to make communities feel safe was to always ensure that the most skilled people were doing the job, regardless of their ethnicity or gender.
- 3.65 When devising local plans, officers will include consideration of the additional ideas put

forward to improve community engagement. Officers also note the perception that improving diversity of the workforce could compromise the quality of the services provided and will consider how to provide reassurance to communities that this is not the case. Officers are of the view that the existing proposals allow them to address the key points raised and no changes are proposed at this time.

Performance measures, including attendance measures

- 3.66 Questions 17 to 21 asked for respondents' views on the proposed performance measures and specifically the proposal to remove a measure of attendance to emergencies.
- 3.67 The first question asked about the extent to which respondents were satisfied that the core performance measures set out in the Plan would enable them to see if we are meeting our commitments. This question was answered by 1,921 respondents 1,136 members of the public, 737 staff, and 48 who preferred not to say. Most members of the public (79 per cent) and staff (62 per cent) agree that the information would provide a way for the public to see whether LFB are meeting their commitments, whilst nearly half (46%) of respondents who preferred not to say what respondent type they were also agreed.
- 3.68 Question 18 provided an opportunity for respondents to add further comments about performance measures. Fewer than a quarter of those who responded to question 17 responded to question 18. Of those that did, many were highly critical of the measures, describing them as being meaningless, politically motivated, ill-explained, or beyond the control of the Brigade and, therefore, not true indicators of the Brigade's performance.
- 3.69 Some wanted to know how the figures had been arrived at and some questioned how extraordinary events such as the fires resulting from the 2022 heatwave would be taken into account. Some suggested that they measured quantity over quality or that they would reduce time spent on other important activities, such as training.
- 3.70 In addition, there was some opposition to the proposal to publish the figures every three months, either because they believed there would be little change in that time or because of the administrative costs.
- 3.71 There were a number of suggestions for performance measures, some of which are already in use internally. Officers will consider these suggestions as part of the development of our more detailed reporting and will seek to reduce the likelihood of unintended consequences arising from focussing on specific areas of performance by identifying a balanced suite of measures across key activities. In the light of this and other comments on the administration costs arising from monitoring and reporting of performance, officers will determine the extent to which additional performance information will be published and with what frequency.
- 3.72 Questions 19 and 20 sought views on the proposal to remove the attendance standard to get a fire engine anywhere in London within 12 minutes. The target for this measure is currently 95 per cent. There are three other core measures of attendance performance and there were no proposals to change those measures.
- 3.73 Question 19 asked respondents to rank the four attendance measures in order of importance. 1,515 respondents 797 members of the public, 670 Fire Brigade staff, and 48 who preferred not to say responded to this question. Staff ranked the 12 minute measure the lowest. Both the public and respondents who preferred not to say what respondent type they were, ranked it as the highest.
- 3.74 Question 20 asked for the extent to which respondents agreed with the proposal to remove the measure. 1,910 responded 1,130 members of the public, 732 Fire Brigade staff, and 48 who preferred not to say.
 - 3.75 There were mixed views about the proposal to remove the target. LFB staff opinion

was fairly evenly spread between the options, with 39 per cent agreeing, 31 per cent disagreeing and 30 per cent stating that they did not know. Nearly half of the public agreed with the proposal to remove the target (47 per cent) with 23 per cent disagreeing. Amongst those who preferred not to say what respondent type they were, 29 per cent agreed with the proposal to remove the target and 54 per cent disagreed.

4 Responses from Organisations

- 4.1 There were 17 responses from organisations, one of which was received too late for its incorporation into the independent analysis report by TONIC, but the points raised have been included here. All organisational responses received have been considered.
- 4.2 Officers took a more rigorous approach to verifying whether individuals were responding on behalf of their organisation or not, and erred on the side of caution, which may partly explain the low response rate.
- 4.3 Appendix 2 provides more detail about the extent to which borough commanders drew the consultation to the attention of their local authorities and partners. This, together with the community engagement with under-represented and seldom heard groups, means that officers are of the view that organisations had sufficient opportunity to provide a response and are satisfied with the number of responses received.
- 4.4 However, it will be important that local authorities, businesses and partners are involved, alongside communities, in the development of the local plans that will be delivered under Commitment 1. Explain how there will be further opportunities to be involved development of local plans will need to involve partners as well as communities. Something about how we will involve stakeholders pan-London? E.g. in the assessment of risk?
- 4.5 Organisations' responses showed broad support for the direction of travel in the CRMP and offered a number of suggestions for further improvement. Officers will write back separately to each organisation and arrange follow up meetings where relevant. A summary of the points raised by each organisation and our response is set out below.
- 4.6 The following organisations chose to respond by letter.

London Assembly Liberal Democrat Group

- 4.7 They supported the performance measures, the four pillars and the eight commitments and voiced support that the plan "outlines comprehensively the main risks the LFB need to prepare for", welcoming the focus on building safety. They also praised recent engagement events.
- 4.8 Areas for improvement included: greater focus on UK and international learning from terrorrelated risks; acknowledgement of increased levels of working from home following COVID-19;
 greater focus on a flood strategy; more information and detail on how the LFB will be
 monitoring and working to understand changes in the built environment; more information
 about changes to fire safety legislation; specific commitments regarding lithium-ion batteries: a
 commitment to ensure the diversity of the cadet programme is reflective of London; more
 detail on community engagement and how we will make provision of materials in a wider
 range of formats and languages and increasing involvement of local politicians.
- 4.9 In response, the CRMP has been expanded to include more information on fire safety, a new section on national resilience, which includes information about our preparation for responding to terrorist incidents, a new section on emerging risks, including alternative fuels and more on the built environment and usage changes since COVID-19. The other suggestions for improvement are also welcomed and officers will consider how best to take these forward in the implementation of the plan.

New Addington Pathfinders

- 4.10 They supported the focus that the CRMP has on "building trust and better preparedness for fires in high rise blocks" and made an offer of working together with LFB going forwards to implement community engagement goals.
- 4.11 They queried why they are no longer receiving arson notifications, as they have an extensive reach across their local communities and also seek the reinstatement of schemes such as Crossfire and Fire Safety Challenge "As residents, we would love to see these projects resurrected, and welcome regular community engagement back again."
- 4.12 Officers view is that changes to the CRMP are not required in response to these points, but officers will respond directly to New Addington Pathfinders.

Action Disability Kensington and Chelsea (ADKC) – Access Group

- 4.13 They offered their support for the CRMP and to work together with LFB on plans to make London more accessible for everyone and fully inclusive of disabled people.
- 4.14 They presented a number of suggestions to help mitigate against the risk disabled and elderly people and their families are exposed to in terms of the danger of fire and not being able to properly deal with daily tasks and routines. These included: full consideration of our Equality Impact Assessment findings as we implement the CRMP; improving access to LFB services for disabled people, a call for greater awareness-raising, training and prevention activity with key groups and a request to improve signage and accessibility of fire assembly points.
- 4.15 Some of these points have been addressed in the amendments to the sections on fire safety in the CRMP and officers will address the remaining points directly with the organisation. Equality impact assessments are undertaken on all Brigade projects and an overarching equality impact assessment for the CRMP is appended to this report.

Heathrow Airport Ltd

- 4.16 Heathrow Airport Ltd's response include detailed and considered points on our approach to the Assessment of Risk and its relationship with our response strategy. Officers will offer a meeting to discuss these points in more detail and an opportunity to be more involved in the annual review of the Assessment of Risk which is underway.
- 4.17 They welcomed "the opportunity to respond to this consultation and continue to value the close relationship it has with LFB both in operational planning and response terms as well as in respect of its fire protection enforcement role."
- 4.18 They affirmed their offer to work with LFB as a "willing partner and/or location to research or trial any of its new operational or organisational practices or to assess their effectiveness."
- 4.19 They also welcomed the focus on building complexity and density
- 4.20 With regard to assessment of risk, they suggest improving the measure for assessment of property or place led risks away from just the number of pumps used, to ensure "wider consequence" assessment to ensure that a relatively small or medium sized incident could be seen as important due to the impact it would have, for example a fire at "a major transport hub could have a major wider consequence effect on the capital or the UK as a whole." 1 They also suggest a greater focus on "those Fire Service duty scenarios that are deemed high consequence but are low (or very low) in frequency", and suggest that "effective operational pre-planning in its more complicated operational environments should carry greater attention" in the CRMP2.
- 4.21 They feel that although the delivery plan is "the most useful in terms of how it sets out some

¹ They reference points C(i) and C(ii) from their (Heathrow) response to the 2021 LFB consultation

 $^{^{2}}$ They reference section F from their (Heathrow) response to the 2021 LFB consultation

- more specific and tangible work streams for LFB now and in the future", that it is too "organisationally internal in nature and so can again leave an external reader less informed about future plans." They also request further information about Programme 3 (on page 11 of the delivery plan) as it develops.
- 4.22 They feel that fire protection and enforcement and operational appliance deployment require further detail in the CRMP.
- 4.23 In response, in addition to the offer of meetings to help shape the revisions to the Assessment of Risk and to discuss issues around response and partnership working, further detail has been added to the CRMP about our current services.

Merton Conservatives

4.24 They offered general support for the CRMP, specifically welcoming "greater engagement with the community" and "improvements to the prevention, protection and response services".

Royal Borough of Greenwich

- 4.25 They welcomed the opportunity to consult and that local resident's views are shaping the CRMP. They also offered to "...support the LFB's engagement with our tenants and leaseholders through our Tenancy Participation team, to raise awareness of and get feedback on matters that are important to them".
- 4.26 They highlighted the importance of working in partnership with social care teams within local authorities around risk assessments in supported living provision, identifying and risk assessing for mitigations residents who are hoarding or self-neglecting, and offering employment opportunities to residents with Learning Disabilities and Autism.
- 4.27 Changes made to the fire safety sections in the CRMP address some of these points and officers will offer to meet to discuss specific ways in which we can work more closely together.

Ellie Reeves, Member of Parliament (MP) for Lewisham West and Penge

- 4.28 The MP showed general support for LFB's consultation with communities, welcoming the return of school visits and community walkabouts after COVID-19 pandemic restrictions and supporting adequate "investment in kit and equipment".
- 4.29 The MP suggested that building trust between communities and LFB could be further achieved through more clear and direct communication with communities "about what LFB is doing outside of emergency services" and "follow ups after LFB attend a scene ... ensuring lines of communication are always open for the public to ask questions or just give their thanks." The MP suggests this could be achieved through greater use of social media and TV advertising.
- 4.30 The MP would like to see greater wellbeing support for LFB staff engaging with their community and receiving mental health support due to stress and trauma they experience.
- 4.31 The MP would welcome "an independent body which holds LFB accountable... would speak volumes to the public and show that Londoners are at the heart of the service provided by their Fire Brigade Units."
- 4.32 In response, officers welcome the support from the MP, especially in relation to her support for our proposals in commitment 2 to improve channels of communication and increase awareness of the services we offer; in commitment 4 to improve the support we offer before, during and after an incident; in commitment 5 to further improve the wellbeing offer to staff. A section on assurance has been added to the CRMP to highlight the level of scrutiny and challenge that the Brigade receives.

Counsellor Cartwright, Chairman of the Public Protection and Enforcement Committee, London Borough of Bromley

- 4.33 Councillor Cartwright endorsed the Assessment of Risk policy document as "an acceptable, detailed document covering operational risk identification and analysis",
- 4.34 However, this is tempered with the view that "there is no mention of how you intend to manage those risks either here in this policy document or in the main consultation report" and that in spite of "significant effort [being] put into trying to involve the local community in this consultation..." it has only resulted in "... an extremely low number of responses."
- 4.35 The Councillor raised further concerns about the CRMP, which included: that it is inadequate in "identifying, planning for, and managing risk"; that there was insufficient detail on operational improvements and on how recommendations from recent public enquiries would be addressed; that further detail be added about "how the LFB will balance its budget in these financially difficult times and still provide an effective and fit for purpose operational service"; that greater importance to be put on operational training, skills and competence, and quality assurance; that there be mention of the recently published Government White Paper on the future of the fire service which he felt was not addressed in the CRMP; that there should be performance measures to measure operational performance; that there should be greater emphasis on core responsibilities and prioritising health and safety; he felt that the CRMP's community commitments do not "align themselves with operational efficiency of the LFB" and noted a lack of focus on LFB control and mobilising systems, which he felt are "crucial to public confidence and the efficiency of the LFB".
- 4.36 Given the concerns raised, officers have already written to Councillor Cartwright and offered to meet to talk through these concerns in more detail. Specifically, officers acknowledged that the CRMP is very different to previous London Safety Plans as it has been developed with input from the communities we serve, confirmed that it is our belief that Londoners expect and want to be more involved in the design and delivery of safety plans and confirmed where in the plan and supporting documentation, the Councillor would wish see more detail which may address some of his concerns.
- 4.37 Amendments to the CRMP post-consultation to address his concerns further include the new sections on fire safety, national resilience and assurance and further detail added where appropriate to address specific points, for example, how we will learn from recent enquiries and that we are awaiting the outcome of the Government's consultation on the White Paper.
- 4.38 Officers have been meeting regularly with all the representative bodies throughout the development of the CRMP and have valued the input provided in those meetings. Two of the unions chose to respond to the consultation.

Fire Brigades Union

- 4.39 In the Fire Brigade Union's (FBU) response, they were supportive of: the inclusion of performance metrics in the CRMP; the references to equality, diversity and inclusion and noted they would "...continue to monitor fairness of application in how this is achieved"; the focus on community trust, climate change and the built-environment and they also noted "the clarity around the number of pumps and stations which is a welcome line in the sand".
- 4.40 Suggested areas for improvement included: that performance metrics should not change over time, noting that "targets cannot always be achieved for a host of reasons"; that response times "should be measured from the time call is received at control", stating that this is "a foundational issue around trust with the public"; that there should be a greater link between Home Fire Safety Visits and dwelling fires, fire injuries and fire deaths."; that there should be acknowledgement that low pay "will and does affect our recruitment and retention" and that this results in many staff living outside of London which "impacts ownership" and how to

"ensure cohesion within community".

- 4.41 They sought more "...acceptance of high stress and acute experience being solely in the operational arena and not in the day to day running of a service"; more emphasis on safe systems of work, especially in relation to resourcing of incidents; whilst they welcomed confirmation that the number of fire engines and stations would be maintained, they raised concerns about current establishment levels and how gaps would be filled.
- 4.42 In the Assessment of Risk, they would like to see "greater emphasis placed on the public's perceived risks" as "this is a psychological safety that we must not overlook."
- 4.43 They go on to ask for clarity around some of the budget examples, case studies and figures used. Suggesting that "the [CRMP] document lacks an understanding around governance." And note that FBU members would find the CRMP "hard to connect with in its current format" and that the delivery plan "feels altogether too complex and unreadable for many", lacking detail on LFCs governance arrangements, giving no dates for project delivery, and not aligning the targets.
- 4.44 They would "like to see the CRMP as it was intended which was to set standards as per the IRMP requirement", also recommending that a "corporate plan" is needed to ensure its proper application.
- 4.45 Director Fiona Dolman and Assistant Commissioner Jon Smith have already offered a meeting with the FBU to discuss their concerns in more detail and to hear their views about how we can make the CRMP more accessible to their members. Additionally, amendments have been made to the CRMP which officers hope will address many of their points, in particular, the additional information on current services and amendments to the finance section. The Brigade already publishes performance on attendance times from time the call is received by Control. A more detailed delivery plan for 2022/23 is available on our website and this will be updated once the CRMP is approved.

GMB

- 4.46 The GMB were grateful for the effort to involve them in the development of the plan and responded formally to confirm that they had no further issues or concerns.
- 4.47 The following organisations responded to the survey itself.

NHS England – London

- 4.48 Their response showed general support for the majority of proposals in the CRMP, with the exception of being "fairly dissatisfied" that the proposed allocation of resources will address risks in London. They did not feel there were any other risks or events that LFB need to prepare for. "LFB is already doing a lot to address risk in London, as part of the London risk assessment process. It is the unknown risks that pose the issue."
- 4.49 They felt LFB's proposed improvements would help to mitigate risks around the situation that "general low level fires are less frequent but bigger incidents are becoming more apparent and having a greater impact".
- 4.50 They neither agreed nor disagreed with the proposal to remove the fourth attendance measure.
- 4.51 They suggest that the Plan does not address "what LFB will do when it meets resource capacity limits, such as the recent major incident declaration, July 2022" and would like to see more focus on ensuring that the CRMP is measurable in order to ensure LFB is meeting its commitments.

4.52 Officers are currently reviewing the Assessment of Risk and will involve partners in its development over the coming months. We will include NHS England to understand how we can work together more closely, respond to and prioritise risk, especially during a major incident. The fourth attendance measure is being retained.

Environment Agency

- 4.53 Their response showed general support for all proposals in the CRMP. They welcomed references to climate change in the CRMP and suggest that "addressing flooding will be prioritised well, especially with the new data regarding the issue."
- 4.54 With regard to removing the '12 minute' target from future plans, their response was "don't know".
- 4.55 They suggest references to flooding are "too vague" and suggest that using phrases such as "'Surface Water Flooding' 'Groundwater Flooding' 'Fluvial or Coastal Flooding' could be more descriptive and emphasised as risks to London." They go on to suggest that better links with communities and better partnership working "to identify specific risks to communities and working with Local Authority Emergency Planners will assist information in multi-agency response plans to help prepare, act, respond and recover from incidents in a safer environment and co-ordinated response." They would like to see more detail on how these ambitions will be achieved and prioritised.
- 4.56 They suggest that as the London area covers a huge amount of risk, "ongoing review of risk assessments and prioritising risks due to current/potential hazards and threats will assist allocation of resource."
- 4.57 They suggest that there is benefit in LFB learning from ongoing reviews, ensuring lessons learned are put into practice, and sharing information with other Fire Brigades through initiatives such as the Joint Organisational Learning (JOL Online etc).
- 4.58 In response officers welcome the acknowledgement of the value of JOL, which the Brigade uses widely. Whilst we acknowledge the importance of distinguishing the different causes and types of flooding, this level of detail is not thought to be required in the CRMP itself.
- 4.59 The differences in risk posed by different types of flooding will be explored further as part of the current review of the Assessment of Risk. We plan to involve partners in its development over the coming months and will invite the Environment Agency to feed into that review. The fourth attendance measure is being retained.

Haberdashers' Crayford Academy

- 4.60 Their response showed general support for the majority of proposals in the CRMP, although they felt the following proposals were less important: developing a range of ways for Londoners to access non-emergency advice; making fire stations welcoming, accessible places where people can come for guidance and support; ensuring LFB staff can easily identify needs of people using services and offer the right services and solutions; evaluating which services deliver the most and least value to prioritise resources that make people safest; and delivering services in an environmentally sustainable way.
- 4.61 They were "very dissatisfied" that the proposed allocation of resources will address risks in London and expressed concerns about Government funding cuts impacting on the quality of frontline services, such as LFB. "The LFB do an amazing job and many people owe their lives to them but the allocation of resources will never be adequate when there are simply not enough stations to go around."
- 4.62 They were "fairly dissatisfied" that the proposed improvements to fire safety in buildings will address risk in London and would like LFB to offer schools fire risk assessments on their buildings as they feel they cannot necessarily have as much trust in the private sector to

perform this function.

- 4.63 With regard to removing the fourth attendance measure from future plans, their response was to neither agree nor disagree.
- 4.64 In response, officers note their concern around the impact of budget pressures on front-line services and would point to the reassurances in the Plan of our intention to maintain the current number of fire stations, appliances and firefighters. Officers also note their desire for the Brigade to offer risk assessments to schools. This is not a service we currently offer as this could conflict with our statutory role to enforce fire safety legislation, however, we will keep this position under review. As mentioned above, the fourth attendance measure will be retained.

Bexley Deaf Centre

- 4.65 Their response showed general support for all proposals in the CRMP. In particular, they offered to help with any advice or deaf awareness to LFB going forward, noting their history of working successfully with local stations and crews. Their response was undecided about whether they agree that the proposed provision of information would provide a way for the public to see if LFB are meeting their commitments. With regard to removing the fourth attendance measure from future plans, their response was to "strongly agree".
- 4.66 They emphasise the challenge of engaging with all communities across London and suggest that "working closely with the voluntary sector will be the key to success with this as these organisations already have really good links within these communities."
- 4.67 They would like to see more detail about how things would be made safer for the deaf community, and specifically would like to see information from LFB available in British Sign Language (BSL), referencing that the BSL Act, which has now been passed in Parliament, will mean LFB should be "considering this in more detail when setting out any future policy."
- 4.68 In response, references to the importance of closer working with and through partners in the voluntary and other sectors have been added to the plan, along with contact details for those wishing to obtain versions of the plan in alternative formats or languages. Officers will also seek a meeting to identify further opportunities to work together.

Justice 4 Grenfell

- 4.69 Their response showed general support for all proposals in the CRMP, stating that "the plan will begin to build greater public confidence" and that it "sets out real change and it is clear that great consideration has been given to previous experience and lessons learnt." With regard to removing the fourth attendance measure from future plans, their response was to "strongly agree".
- 4.70 They are concerned about how public spending cuts will affect the services LFB can offer and want the plan to set out "what has been identified as lesser priority if resources were to be cut.". They also acknowledge that LFB will need "political will and government policy changes to support its delivery."
- 4.71 They would like to see community engagement made into a measurable performance objective for all LFB personnel. They also feel KPIs for LFB should also include qualitative ones as well as statistical ones.
- 4.72 They would like to see information from LFB made available in the full range of languages used by London's communities
- 4.73 In response, officers note their concern around the impact of budget pressures on front-line services and would point to the reassurances in the plan of our intention to maintain the current number of fire stations, appliances and firefighters. The CRMP also now notes that the

- current financial uncertainty and acknowledges that there may need to be further prioritisation of proposals within the plan.
- 4.74 Officers will involve Justice 4 Grenfell and other community groups in the development of the two new measures around community satisfaction and impact so that they consider qualitative aspects as well as quantitative ones. Contact details for those wishing to obtain versions of the plan in alternative formats or languages have been added to the CRMP.

Florence Road Residents' Group

- 4.75 Their response showed general support for the majority of proposals in the CRMP and suggested that it covers the major risks faced, and "if all are addressed it will make a far safer London." They support the overall approach, saying that "improving safety, listening to residents' concerns and ideas, working with other groups and increasing diversity in the force are all good plans for the future."
- 4.76 However, they felt collecting information from social media to understand Londoners' views of services to help improve them and increasing awareness of services offered and ways to reach LFB were "not very important".
- 4.77 They were generally undecided about the following proposals: to improve recruitment and retention to ensure workforce reflects the city's diversity; to increase talent and diversity of our workforce to help shape LFB culture; to improve staff wellbeing and be inclusive of diverse needs; to prioritise staff health and safety and support staff throughout their careers; to improve team working and reduce duplication for more efficient delivery; to invest in latest office technology to deliver better quality services and solutions; and whether the plan will strengthen LFB leadership on equality and diversity. With regard to removing the last target (above) from future plans, their response was to "strongly agree".
- 4.78 In terms of improvement, they would like to see "more community days. more visibility. We were lucky enough to get the opportunity to speak to fire personnel in our recent street party. More please!"
- 4.79 Officers note that not all of the proposals in the Plan were supported. Those that received less support than others will be given particular consideration should there need to be any reprioritisation within the plan due to financial constraints. Commitment 1 in the plan aims to increase the level of engagement with communities and visibility of our staff, so officers expect that this will meet their expectations for more community days.

Fire, Resilience and Emergency Planning Committee

- 4.80 The Committee made a number of recommendations, many of which support the ambitions committed to within the Plan and some of which indicate how the Committee would like to see the specific objectives within the Plan taken forward. Officers accept all of the recommendations and will write to the Committee and provide a more detailed response to each recommendation.
- 4.81 Changes have been made to the Plan in response to specific requests by the Committee, including the addition of a performance measure for the percentage of firefighters who have received training in responding to a marauding terrorist attack. Officers have also introduced new sections on national resilience and emerging and future risks.

5 Summary of changes

5.1 Several new sections have been added to the Plan to provide further detail in response to comments to the consultation. These include more on fire safety and regulation, emerging and future risks, national resilience, and assuring our services. Our intention is to keep the strategy as high-level as possible, but officers recognize that this document needs to meet many

- requirements and it is hoped that these sections will provide people with the reassurance they are seeking about our plans.
- 5.2 The level of detail provided in the plan is now commensurate with that in previous plans, which have met the expectations of the government. The most recent assessment of when it has 21 July 2020 report by the Home Secretary on Fire and Rescue Authorities' compliance with the Fire and Rescue National Framework for England "...is satisfied that every fire and rescue authority in England has acted in accordance with the requirements of the National Framework".
- 5.3 However, there is one limited respect in which it is arguable that the CRMP may not meet the requirements of the National Framework. As set out above, the National Framework requires that the CRMP 'set out' the LFB's management strategy and risk-based programme for enforcing the provisions of the Regulatory Reform (Fire Safety) Order 2005 ('RRO') in accordance with the principles of better regulation set out in the Statutory Code of Compliance for Regulators, and the Enforcement Concordat.
- 5.4 Officers responsible for the enforcement of the RRO are content that the CRMP sets out the 'management strategy' for enforcing the RRO; however, the CRMP does not set out a 'risk-based programme' for enforcing the RRO.
- 5.5 The LFB's 'risk-based programme' for enforcing the RRO is the LFB's Risk-Based Inspection Programme ('RBIP'). The RBIP is generated each year by the LFB's fire safety database, and is primarily based on specialist officers' assessments at a local level as to which premises should be audited, applying a London-wide approach to assessing risk and taking into account local and national priorities. Specialist inspectors then decide what form the fire safety audit of each set of premises should take.
- 5.6 There is no single document which constitutes the RBIP and, because of the way in which it is generated by the fire safety database, it would not be reasonably practicable to reproduce it in a single document. Moreover, the RBIP is generated annually, and therefore even if it were possible to set the RBIP out in the CRMP, it would soon become out of date.
- 5.7 On this basis, it would be prudent for the LFC to proceed on the basis that the CRMP does not 'set out' the RBIP and that therefore, in this limited respect, the CRMP does not comply with the National Framework.
- 5.8 As a result, the Commissioner should only proceed to take the decision if he is satisfied that there is a good reason for not setting out the RBIP in the CRMP (whether directly or by cross-reference). Officers' view is that there is such good reason, in that it would be impracticable to set out the RBIP in the CRMP, the RBIP would be of limited utility to readers of the plan even if it were to be set out, and this represents only a relatively minor departure from the requirements of the National Framework.
- 5.9 Accordingly, it is recommended that the Commissioner proceed on the basis that a limited departure from the National Framework, by not setting out the RBIP in the CRMP, is justified for these reasons.

6 Implementation of the Plan

- 6.1 On publication, the CRMP will replace the Brigade's existing London Safety Plan 2017, which has been extended to the end of March 2023. The new CRMP is expected to commence from 1 January 2023.
- 6.2 Officers are currently developing a full communications plan that will include details about how we will work with communities, the community forum, local authorities and other stakeholders, the business community, staff and partners to publicise and deliver the Plan.

- 6.3 The Plan will be sent to the Fire, Resilience and Emergency Planning Committee in early September, for their consideration at their meeting on 19 October. The Mayor will consider their subsequent report and officers expect that the Plan will be approved by the end of the year.
- 6.4 The Delivery Plan and the Measuring Our Success documents will be updated and published on our website alongside the Plan. The Assessment of Risk will be updated annually and will also be published on our website.
- 6.5 The funding and approval of all initiatives will be subject to the relevant governance arrangements.
- 6.6 A formal review of progress may be undertaken partway through the life of the Plan to determine whether or not any changes are needed.

7 Equality comments

- 7.1 The LFC and the Deputy Mayor for Fire and Resilience are required to comply with the Public Sector Equality Duty (section 149 of the Equality Act 2010) when taking decisions. This in broad terms involves understanding the potential impact of policy and decisions on groups of persons who share certain protected characteristics, people, having due regard to any such potential impacts when taking decisions, and then evidencing how decisions were reached.
- 7.2 It is important to note that consideration of the Public Sector Equality Duty is not a one-off task. The duty must be fulfilled before taking a decision, at the time of taking a decision, and after the decision has been taken.
- 7.3 The protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership (but only in respect of the requirements to have due regard to the need to eliminate discrimination), race (ethnic or national origins, colour or nationality), religion or belief (including lack of belief), sex, and sexual orientation.
- 7.4 The Public Sector Equality Duty requires decision-takers in the exercise of all their functions, to have due regard to the need to:
 - eliminate discrimination, harassment and victimisation and other prohibited conduct.
 - advance equality of opportunity between people who share a relevant protected characteristic and persons who do not share it.
 - foster good relations between people who share a relevant protected characteristic and persons who do not share it.
- 7.5 Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:
 - remove or minimise disadvantages suffered by persons who share a relevant protected characteristic where those disadvantages are connected to that characteristic.
 - take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it.
 - encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
- 7.6 The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.

- 7.7 Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:
 - tackle prejudice
 - promote understanding.
- 7.8 An Equality Impact Analysis has been undertaken and is included within Appendix 5. As the CRMP is a high-level strategy, it is too early to assess the detailed implications of the proposals, which include actions to ensure our services address the needs of all Londoners and for our workforce to better reflect the diversity of London. Where initiatives in the Plan result in equalities implications, the impact and mitigations will be identified on a case-by-case basis as the Plan moves into delivery.

8 Other considerations

Workforce comments

8.1 Engagement with the trades unions and equality support groups took place throughout the production of the Plan and their views helped shape the approach to its development as well as the content. A Health and Safety Impact Analysis has been undertaken and is included within Appendix 5. Where initiatives may result in specific health and safety impacts, they will be identified and mitigated on a case-by-case basis as the Plan moves into delivery.

Sustainability comments

8.2 A sustainability impact analysis has been undertaken and is included within Appendix 5. Where initiatives in the Plan result in sustainability implications, the impact and mitigations will be identified on a case-by-case basis as the Plan moves into delivery.

Procurement comments

8.3 Some of the initiatives in the Plan will have procurement implications. These will be assessed on a case-by-case basis as the Plan moves into delivery.

Communications comments

- 8.4 Strategic Planning have worked in partnership with the Communications team on all aspects of the consultation, engagement, development and design of this plan, co-ordinated by the Transformation Communications Officer, a temporary appointment, established to be the single point of contact between the Transformation and Communications directorates on the CRMP and other transformation communications.
- 8.5 The Communications plan for staff, the public, partners and other key stakeholders for the launch and roll out of the Plan is in development.

9 Financial comments

- 9.1 This report recommends that the draft Community Risk management Plan for 2023 is approved. The CRMP is the Brigade's strategy for how it intends to achieve its purpose and its vision over the next five years; and describes the strategic changes the LFB will make over that time
- 9.2 The Plan is attached at Appendix 1 and sets out a range of commitments that could result in additional resource requirements within the LFB. These include:

- Community engagement sessions will run in each local area to enable us to reach you and all of London's diverse communities
- Technology will be used to enable local LFB staff to easily capture and access local risk information and share with the rest of the organisation
- Flexible ways to access services Improve understanding of your personal circumstances and needs
- Non-Emergency Line You and your communities will be able to access services through a broader range of methods to get non-emergency advice and reassurance
- Replacement Mobilising System Improve the way we mobilise and coordinate our response activities to improve outcomes for you
- Incident Management Enhancements Replace our command units, Breathing Apparatus, and radio for improved incident management
- Modern Fire and Rescue Technology and Tactics Adopt cutting edge fire and rescue technology and tactics and associated training needed to improve our response according to your needs
- Enhanced support services Increase trust in LFB through proactive, continued support through all stages of an incident
- Organisational Learning Model Improve our ability to learn and develop together so staff can develop the right skills to meet your needs
- Improved Training Systems & Assets Equip staff with the right skills and career development opportunities to serve you better
- Improve technology to support frontline services Streamline our support services to ensure that frontline service delivery is optimised
- Support our staff Offer a single easy to use staff support system to enable improved staff experience and productivity
- Net Zero 2030 Deliver environmentally sustainable outcomes for London through adjustments to the way we deliver our services
- 9.3 Any additional resources requirements identified as part of these commitments will be considered as part of subsequent reporting in line with the LFB's governance requirements. Any financial pressures identified will then need to be considered as part of the LFB's budget process for future years along with the implication to the savings and efficiencies that the LFB will be required to achieve

10 Legal comments

Commissioner and Mayor/Mayoral Direction

- 10.1 Under section 9 of the Policing and Crime Act 2017, the London Fire Commissioner ("Commissioner") is established as a corporation sole with the Mayor appointing the occupant of that office.
- 10.2 Section 1 of the Fire and Rescue Services Act 2004 states that the Commissioner is the fire and rescue authority for Greater London.
- 10.3 Under section 327D of the GLA Act 1999, as amended by the Policing and Crime Act 2017, the Mayor of London ("Mayor") may issue to the Commissioner specific or general directions as to the manner in which the holder of that office is to exercise their functions.
- 10.4 By direction dated 1 April 2018 ("Direction"), the Mayor set out those matters for which the Commissioner would require the prior approval of either the Mayor or the Deputy Mayor for Fire and Resilience ("Deputy Mayor"), specifically the Mayor has set out the following requirements in regards to scrutiny of the Community Risk Management Plan ("CRMP") (the

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CRMP was previously referred to as the London Safety Plan):

- 1.1 The prior approval of the Mayor is required before any of the following decisions is taken: ...
 - b. Approval of the final proposed text of the draft London Safety Plan (or any revision of it) for the purposes of sending it to the Assembly under section 327G(2) of the GLA Act 1999
- 3.1 The Deputy Mayor for Fire shall be consulted as far as practicable in the circumstances before a decision on any of the following is taken:
 - a. Anything that requires the consent of the Mayor under Part 1 of this Direction;
- 6.1 In this Direction: ...
 - b. "London Safety Plan" refers to any document which is prepared and published by the Commissioner in accordance with the Fire and Rescue National Framework and which contains the matters described in section 327G(1)(a) and/ or (b) of the GLA Act 1999;

GLA Act 1999

- 10.5 Furthermore, section 327G of the Greater London Authority Act 1999 ("1999 Act") sets out the steps required to be taken in regards to scrutiny of the CRMP as prepared by the Commissioner. It states that:
 - (1) This section applies to a document which is prepared and published by the London Fire Commissioner in accordance with the Fire and Rescue National Framework and which -
 - (a) sets out the Commissioner's priorities and objectives, for the period covered by the document, in connection with the discharge of the Commissioner's functions, or
 - (b) contains a statement of the way in which the Commissioner has had regard, in the period covered by the document, to the Framework and to any document within paragraph (a) prepared by the Commissioner for that period.
 - (2) The Commissioner must, before publishing the document or any revision to it, send a copy of the document or revision in draft to the Mayor and the Assembly.
 - (3) The Commissioner may not publish the document or any revision to it unless -
 - (a) the Assembly has had an opportunity to review the draft document or revision, and make a report on it to the Mayor, under section 327I(1), and
 - (b) the Mayor has approved the draft document or revision.
 - (4) In this section "the Fire and Rescue National Framework" has the same meaning as in section 327D.

National Framework

10.6 As indicated in the 1999 Act, when carrying out his functions, the Commissioner, as the fire and rescue authority for Greater London, is required to "have regard" to the Fire and Rescue National Framework prepared by the Secretary of State ("Framework") (Fire and Rescue Service Act 2004, section 21).

- 10.7 To have regard does not mean to follow slavishly, if the Commissioner wishes to depart from the Framework, he may, but he must take a conscious decision to do so, he must have a good reason for doing so and he must explain his reasoning.
- 10.8 The production of an Integrated Risk Management Plan (IRMP) is a requirement of the Framework. In line with guidance from the National Fire Chiefs' Council, the Commissioner is now referring to the IRMP as a Community Risk Management Plan (CRMP).
- 10.9 The Commissioner should be clear that the final CRMP for publication, as it constitutes the Commissioner's IRMP, must meet the requirements of the Framework. Therefore, if the Commissioner is of the view that any part of the Framework's requirement is not met then either the draft CRMP must be amended until it is compliant with the Framework or the Commissioner may decide to depart from the Framework and proceed with the IRMP as drafted if he has good reason for doing so (and that reason must be explained).
- 10.10 The Framework states that the Commissioner's CRMP "must" meet certain requirements, these are set out below and to assist with the consideration of these matters' a short commentary has been provided following each item.

10.11 The CRMP "must":

• reflect up to date risk analyses including an assessment of all foreseeable fire and rescue related risks that could affect the area of the authority;

The Commissioner should therefore consider whether the CRMP properly reflects the Commissioner's risk analysis. It would not be sufficient to state it is met by reference to additional documents, the CRMP itself must demonstrate this in of itself.

When considering if the risk analysis is properly reflected in the CRMP it is not required that it reproduces the analysis completely but instead that it represents it accurately and in an appropriate way.

demonstrate how prevention, protection and response activities will best be used to
prevent fires and other incidents and mitigate the impact of identified risks on its
communities, through authorities working either individually or collectively, in a way that
makes best use of available resources;

The Commissioner should form a view on whether the CRMP does indeed "demonstrate" that this requirement of the Framework is met. It would not be sufficient to state it is met by reference to additional documents, the CRMP itself must demonstrate this in of itself.

To "demonstrate" does not require that every aspect of the prevention, protection and response activities be set out. The Commissioner should consider whether the CRMP allows a sufficient understanding of how these activities will prevent fires and other incidents and mitigate the impact of identified risks.

 outline required service delivery outcomes including the allocation of resources for the mitigation of risks;

To outline something does not require every aspect to be set out in full. The Commissioner should be content that the service delivery outcomes are rational, clearly set out, comprehensible and that the documents include appropriate reference to the allocation of resources.

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 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;

The LFB's 'risk-based programme' for enforcing the RRO is the LFB's Risk-Based Inspection Programme ('RBIP'). The RBIP is generated each year by the LFB's fire safety database, and is primarily based on specialist officers' assessments at a local level as to which premises should be audited, applying a London-wide approach to assessing risk and taking into account local and national priorities. Specialist inspectors then decide what form the fire safety audit of each set of premises should take.

There is no single document which constitutes the RBIP and, because of the way in which it is generated by the fire safety database, it would not be reasonably practicable to reproduce it in a single document. Moreover, the RBIP is generated annually, and therefore even if it were possible to set the RBIP out in the CRMP, it would soon become out of date.

On this basis, it is likely that the Commissioner is entitled to conclude that there is good reason for not setting out the RBIP in the CRMP (whether directly or by cross-reference), on the grounds that it would be impracticable to do so, the RBIP would be of limited utility to readers of the plan even if it were to be set out, and this represents only a relatively minor departure from the requirements of the National Framework.

Accordingly, it is recommended that, should the Commissioner decide to send the draft CRMP to the Deputy Mayor, he does so on the basis that he is content that the CRMP should depart from the National Framework by not setting out the RBIP in the CRMP, for these reasons.

cover at least a three-year time span and be reviewed and revised as often as it is
necessary to ensure that the authority is able to deliver the requirements set out in this
Framework;

The minimum allowable timespan for the CRMP is three years. There is no stated upper limit therefore the Commissioner should consider what is reasonable.

There is no requirement to set out a review or revision criteria, process, or timetable now or at the start of the CRMP, a review or revision may be undertaken at any time that it becomes necessary to ensure the delivery of the Framework's requirements.

 reflect effective consultation throughout its development and at all review stages with the community, its workforce and representative bodies and partners;

This report and its appendices set out the consultation process that has been undertaken.

be easily accessible and publicly available.

Online publication of the final CRMP will meet this requirement, no decision is required at this time.

Consultation

- 10.12 This report has been produced following a consultation on the draft CRMP in compliance with the requirements of the National Framework that the CRMP "reflect effective consultation throughout its development and at all review stages with the community, its workforce and representative bodies and partners".
- 10.13 The product of consultation must be given "conscientious consideration" in the decision-making process. This report and its appendices provide analysis of the consultation responses and attach an updated draft of the CRMP incorporating the recommended changes following consideration of the consultation. It is important that the points made in the consultation responses (including alternative proposals) are taken into account in the decision-making process, as a failure to do so may be considered a "material and important deficiency" in the consultation process which could render the CRMP open to legal challenge.
- 10.14 This report provides information on the consultation responses, including an independent report on the same, and the draft CRMP has been amended having considered the consultation responses.

Summary

- 10.15 The practical effect of the Framework, 1999 Act and Direction are to require that the following process must be followed in order to publish the final CRMP:
 - Commissioner prepares initial draft CRMP (Framework)
 - Public consultation is undertaken (Framework) (N.B the Framework does not specify exactly when consultation should occur)
 - Deputy Mayor is 'consulted as far as practicable' on any draft prepared before sending to the Assembly (Direction 3.1)
 - Mayor's approval is required before sending the draft to the Assembly (Direction 1.1),
 - Assembly scrutinise the draft CRMP and prepare a report for the Mayor (s327G(3)(a)),
 - Mayor must approve the draft CRMP prior to publication to the public (s327G(3)(b)),
 - Commissioner publishes the approved draft as the final CRMP to the public.
- 10.16 The recommendation in this report will constitute the Commissioner's final proposed text of the draft CRMP for the purposes of sending it to the Assembly under section 327G(2) of the GLA Act 1999, the practical effect of this decision will therefore be to activate the provisions of the Direction requiring the Commissioner to seek the Mayor's approval, having consulted the Deputy Mayor, to undertake that step.
- 10.17 Upon receipt of the Mayor's approval, which may be withheld, the draft CRMP may be provided to the Assembly to allow them opportunity to report on it to the Mayor as set out in s327G(3)(a) of the 1999 Act.

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List of appendices

Appendix	Title	Open or confidential*
1.	Community Risk Management Plan Your London Fire Brigade	Open
2.	How we consulted	Open
3.	TONIC report	Open
4.	YouGov results	Open
5.	Impact analyses	Open

Part two confidentiality

Only the facts or advice considered to be exempt from disclosure under the FOI Act should be in the separate Part Two form, together with the legal rationale for non-publication.

Is there a Part Two form: No

Originating officer declaration	Reporting officer to confirm the following by using 'x' in the box:
Reporting officer [Report author] has drafted this report and confirms the following:	
Director Fiona Dolman has reviewed the documentation and is satisfied for it to be referred to Board for consideration	х
2. Advice The Finance and Legal teams have commented on this proposal:	
Thomas Davies Legal Advisor, on behalf of General Counsel (Head of Law and Monitoring Officer).	x
David O'Sullivan Financial Advisor, on behalf of the Chief Finance Officer.	х

MD3051 Appendix 5

LONDONASSEMBLY

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Anne Clarke AM
Chair of the Fire, Resilience and Emergency Planning Committee

Sadiq Khan Mayor of London

(Sent by email) 21 October 2022

Dear Sadiq,

At its meeting on 19 October 2022, the Fire, Resilience and Emergency Planning Committee, considered the London Fire Commissioner's Community Risk Management Plan (CRMP) 2023-29.

In accordance with Section 327I of the GLA Act 1999 (as amended), the Committee is required to review and make a report or recommendation to the Mayor on any draft document or revision prepared by the London Fire Commissioner under section 327G of the Act. This review must occur prior to the Mayor approving the draft document or revision for publication.

The Fire, Resilience and Emergency Planning Committee formally received the CRMP 2023-29 and agreed that this forms the recommendation to you, in accordance with the requirement set out at Section 327I of the Act.

The Committee also made comment as follows:

 The Committee acknowledges that the CRMP has been amended to respond to the recommendations made in the Committee's report, published on 22 August, that responded to the draft CRMP.¹ It welcomes the finalisation of the Plan and looks forward to its publication. The Committee notes the decision to move to a more dynamic approach in regards to London Fire Brigade's performance indicators which will be reported in its Quarterly Financial and Performance Reports. This will allow the indicators to be reviewed and updated during the lifespan of the Plan. The Committee will continue to keep under scrutiny the delivery of the CRMP and the Brigade's Performance Indicators as part of its work programme.

Please contact Diane Richards, Committee Officer, at diane.richards@london.gov.uk if you have any questions about this matter.

Yours,

Anne Clarke AM

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Chair of the Fire, Resilience and Emergency Planning Committee

¹ Fire, Resilience and Emergency Planning Committee, Report on the draft CRMP, August 2022



Appendix 5 2 September 2022

Community Risk
Management Plan

Impact Assessments

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Purpose

- 1. The analysis of the impact of any policy, provision, or service, or change thereto, must be in compliance with s.149 of the Equality Act 2010, known as the Public Sector Equality Duty (PSED). The PSED sets out that a public authority, in the exercise of its functions, must also have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between persons who share a relevant protected characteristic and those who do not share it.
- 2. The following characteristics are protected characteristics:
 - age
 - disability
 - · gender identity and reassignment
 - marriage and civil partnership
 - pregnancy and maternity
 - race
 - religion or belief
 - sex
 - sexual orientation
- 3. It is implicit in having 'due regard' that we consider any impact on people who share relevant protected characteristics. This may in some cases require evidence gathering, engagement or consultation with those affected by the proposed policy or change. The ultimate purpose of any analysis is to provide those making the decision with the information to make an informed decision, so that where possible potential differential impact is eliminated, and where it is not possible, that it is mitigated against.
- 4. The concept of due regard requires that there has been a proper and conscientious focus on what the duty requires. The decision cannot then be interfered with judicially simply because a judge would have given greater weight to the equality implications of the decision than did the decision maker. The decision maker must be clear what the equality implications are when they put them into the balance with other considerations, and they must recognise the desirability of achieving them, but ultimately it is for the decision maker to decide what weight they should be given considering all relevant factors.
- 5. The Equality and Human Rights Commission has also provided guidance stating that organisations subject to the PSED must ensure that the impact financial proposals could have on the performance of the general equality duty is properly considered as part of the decisionmaking process.
- 6. This Equality Impact Assessment considers the anticipated impact on people who share protected characteristics of the London Community Risk Management Plan 2023 202January 2023. This plan and its supporting appendices have been through a public consultation process with the communities of London and this EIA has, where necessary been amended to take into

consideration responses received through that and the London Fire Commissioner's (LFC's) own governance processes.

- 7. In accordance with the UK government's Fire and Rescue Service National Framework 2018, the (LFC) is required to produce a (CRMP). This time in London it is called Your London Fire Brigade. The Fire and Rescue Services Act 2004 (FRSA) 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 LFC must 'have regard' to its contents when planning and delivering its services.
- 8. This Equality Impact Assessment (EIA) has been prepared by the Head of Strategic Planning. This document considers which proposed actions have the potential to have some equality impact, and how equality analysis may be undertaken for those actions.

Anticipated Impact

9. The Community Risk Management Plan comprises four new pillars and eight commitments which will transform the way the Brigade delivers its services over the life of the Plan.

Commitment 1. Community focussed. Our first commitment ensures that all communities in London have a voice and that we will act as a voice for fire and rescue related risks for all communities including those that may find it hard to be heard. This will mean that we will work towards providing equity of service across London's diverse communities so that service can be tailored at a local level to meet the needs of local communities who share protected characteristics especially ethnically diverse communities.

Commitment 2. Service-led. Our communities will feel this commitment in the way they access our services. Our services will be made accessible for all. This may mean that we increase the number of services which are available online. However, in doing this we want to free up capacity to ensure that those who are most vulnerable from fire and other risks access our services in a way that suits them. This will mean that those communities who share certain protected characteristics such as people with disabilities or older people will have services tailored to their needs.

Commitment 3. Adapting to change. We will adapt our services as London's needs change and risks evolve. This will mean continuing to adopt the most modern fire and rescue service technology, training, and tactics. We will update our understanding of risk in London annually and review our plan if there are any significant changes to London's risk profile. As such if there is a change in socio economic landscape which includes changes in protected characteristics then we will be able to adapt our services to ensure that these changes are considered in how we respond to changing risks.

Commitment 4. Driven by outcomes. We will enhance our services both before and after we are called to an incident to ensure that everyone receives the help, they need to mitigate risk and reduce future harm. This means that those who are most vulnerable in our society to fire and other

emergencies, such as older people or people with disabilities receive the care that they need to keep them safe and help make them feel safe in their homes, at work or in public places.

Commitment 5. Best People. We know that it is important to Londoners that LFB reflects the communities they serve. As part of this plan, we will work to ensure that our staff are reflective of their local communities and that we represent London. We will introduce measures to monitor how diverse our workforce is and set targets so that we can measure our progress towards achieving a workforce that is representative of the London we serve. We will take positive action to recruit and promote underrepresented groups across all protected characteristics.

Commitment 6. Working Together. We will work together as one team to deliver this plan and its projects. We will ensure that each project contains a detailed EIA to identify the impacts of each change on the communities we serve and to ensure that everyone has a voice. We know we need to learn from you as much as you need us to deliver the best services we can. We will continue to learn from you throughout the life of this plan to ensure that we build a safer London together.

Commitment 7. Delivering value. We know that the money we receive comes from the taxes that Londoners and London's businesses pay. We want to deliver the most valuable service we can and ensure that every penny we have is put towards making Londoners safer. This is important for all Londoners and especially those with particular protected characteristics who may not have access to the financial support needed to make themselves safer and therefore are more likely to need our direct support.

Commitment 8. Safer Future. By working for a safer future, we are committed to reducing our carbon footprint and making London's air cleaner for those who live in our communities. This commitment is especially important for those who have difficulty breathing or live in areas of high population density. We will work with all London's communities through our enhanced community engagement to ensure that we continue to represent the things that matter to them the most and set up wider groups to represent all protected characteristics.

- 10. As part of our commitments we will be exploring flexible resourcing models to increase productivity and free up staff to deliver more prevention and protection activity and undertake professional training. We also review our resource allocation in relation to risk on an annual basis and will continue to review the locations of some of our specialist appliances. Any review that considers the location and use of operational resources will be considered for its impact both on staff and on service users affected by any proposal.
- 11. We will look at the available space that we have on some of our station estate to explore what we can do to help tackle the housing challenges facing London. Consideration will need to be given to the affordability of any proposals for average Londoners.

Evidence

What we know about our staff

12. The LFC holds data on staff regarding sex, race, disability, age, sexual orientation, and religion. Specific data is not collected on the remaining protected characteristics of gender reassignment, marital/civil partnership status and maternity. The data held is supplied both at recruitment and on employment, and staff are periodically reminded to review and update the information held on them according to the requirements of the Data Protection Act.

What we know about the people impacted by our services

- 13. We hold a wide range of data about the incidents (including fires that happen in London and the casualties that result). We also hold data about the services we provide the time it takes for appliances to respond to emergency incidents and the community safety work, like home fire safety visits, we carry out.
- 14. The following conclusions can be drawn from the data:
 - Total incidents attended: There is a downward trend in the number of incidents LFB has
 attended, with a lower number in 2021/22 compared to five years earlier. We expect the
 number of incidents we attend will remain at this lower level over the life of the Plan, or
 that some types of incident may rise slightly in line with the rising population in different
 boroughs.
 - **Total fires attended**: The number of fires attended by the LFB over the last five years has fallen. We expect the number of fires to remain at this lower level over the life of the Plan, or to increase only slightly in line with the rising population.
 - Fire casualties (deaths and serious injuries): The LFB has not been able to identify any pattern to the numbers of fire deaths or injuries in different areas, and the fires that give rise to casualties are relatively random events. We do know that that older people, particularly men who are smokers, are more at risk of being a fire casualty. We will continue to develop our understanding of what increases people's vulnerability to fire and other emergencies and work to integrate the outcomes of the National Fire Chief's Council (NFCC) Definition of Risk project.
 - Home fire safety visits (HFSVs) carried out: HFSVs are one of the main ways in which the
 Brigade seeks to prevent fires in home, and to reduce casualties, if a fire does break out. We
 intend to deliver more of these services online through our Home Fire Safety Visit Checker,
 allowing us to spend more time targeting the most vulnerable people in London, working
 with partners to deliver additional support when there are particular needs.

What we know about local risk

15. In June 2021, the LFC agreed a new approach to the Assessment of Risk (AoR). This new approach considers risk in London from a range of perspectives. At the centre of the risk assessment are concerns that people locally think impact on their safety, particularly in respect of fire which relate to people and the places they live. The AoR also combines likelihood and consequences of the actual incidents LFB attends and the casualties (fatal and non-fatal) that

arise (based on historic data). Additionally extraordinary risks and future risks are considered so that we can ensure that we have a full picture of risk in London, now and in the future.

- 16. In September 2021, we engaged within internal and external stakeholders to refine this AoR through a public consultation. This has resulted in the inclusion of more 'concerns' identified by stakeholders, together with a fuller explanation of consequences.
- 17. A further academic and professional review of the AoR was undertaken by an independent panel to test its robustness and defensibility. This resulted in some minor changes to clarify meaning but no changes were made to the overall risk assessment.

People who share protected characteristics

- 18. Operational response services are not provided based on a person's protected characteristic; however, it is important that this data is presented to consider whether there is any indirect differential impact on people who share protected characteristics. The London Fire Brigade uses data obtained from the 2011 census however it should be noted that the census did not collect information on all protected characteristics.
- 19. The 2011 census shows that London-wide, this will be updated with data from the 2021 census as soon as this is available:
 - 12 per cent of the population is **aged 65**;
 - 43 per cent of the population have an ethnically diverse background;
 - 14 per cent of the population have a disability;
 - 74 per cent of the population have a **faith**;
 - 3.2 per cent of the population are **estimated to be lesbian, gay, or bisexual** according to the integrated household survey 2013 release. This information was not collected in the 2011 census.
- 20. The Brigade targets its fire safety work on lifestyles or risk factors of individuals rather than groups of people who share protected characteristics. This is because information about incidents collected by the Brigade indicates that the behaviour and lifestyles of individuals remains one of the primary factors in the number of fires that LFB attends. Whilst it is true that certain lifestyles identified as being at higher risk will also contain people who share protected characteristics, belonging to a protected characteristic group in the first place does not necessarily place individuals at risk. However certain protected characteristics can mean that individuals from certain groups of protected characteristics may be more vulnerable from fires and other emergencies. An example would be older people or people with disability who may not be able to react and escape from a fire as easily as someone who did not share these protected characteristics. Similarly, people who come from ethnically diverse backgrounds, especially those who second language is English, may not be able to access certain services as easily as people who are born in London.
- 21. In determining the most vulnerable people in the community, the Brigade uses a suite of statistical analysis techniques to better understand where incidents occur and who is affected by

them. Our developing Assessment of Risk is one of those tools. A further layer of information is added using Acorn lifestyle profile data to see which types of people are at greatest risk from accidental fires in the home. Acorn is a commercial product that describes households by different lifestyles. We use this information to arrive at priority postcodes so that we can target our preventative work in areas that are overrepresented in terms of their combined fire/casualty risk. This enables the Brigade to use its resources in the areas where they will have most impact. We are currently working with the NFCC's to integrate their national work on the Definition of Risk into our analysis to further enhance our targeting of the most vulnerable people in London.

Consultation

- 22. In September 2021 we completed a consultation on our Four new pillars and eight commitments, along with the AoR. A covering report detailing the questionnaire responses as well as the consultation analysis was produced by Tonic in response to this consultation.
- 23. Additionally, we undertook a range of community engagement sessions and two YouGov surveys between January 2021 and March 2022 to understand communities needs, wants and expectations of LFB and our proposals.
- 24. We also undertook a range of face-to-face engagement with our staff at Fire Stations, in Area teams and in our Control centre.
- 25. The feedback gathered from these sessions was fed into the development of our Target Operating Model and the updating of our AoR.
- 26. 36 A second phase of consultation on the DRAFT CRMP was carried out between May and July of 2022. Public responses were collected primarily using the Talk London portal but a number of paper hard copies were also received.
- 27. To ensure accessibility, people were able to request paper hard copies on which to make their responses if this was their preferred method. Versions of the document in languages other than English and in easy read format were also available. Consultation responses in the form of letters and emails were also accepted.
- 28. Details on the proposals and how to respond were sent directly to key stakeholders, including London MPs and MEPs, Assembly Members, central government officials and ministers, leaders of the political groups at London boroughs, chief executives of London boroughs, chief executives of other emergency services in London and neighbouring fire and rescue services, public bodies, equalities bodies and other stakeholder organisations.
- 29. At the borough level, Borough Commanders held local community consultation session in their boroughs and held engagement sessions with key local partners in their respective boroughs to ensure they understood the proposals and made themselves available to attend scrutiny meetings.

- 30. Staff were kept informed of the consultation process and were encouraged to take part using our usual internal communication channels and the TONIC response portal. Response and discussion and engagement were encouraged on Hotwire (LFB's main internal communication platform) and via staff communication from managers and officers at all levels up to and including the London Fire Commissioner. Staff could also raise questions through their line management chain, via the consultation mailbox.
- 31. At the midpoint of the consultation period, officers reviewed the responses received (in terms of origin of responses, not content), to identify where particular groups may be underrepresented. Digital marketing was used to encourage responses from those groups and direct contact was made with organisations representing or already communicating with these groups, asking them to publicise the consultation to encourage people to respond.

Proposed actions

- 32. Staff we employ. There are no firm proposals that would result in the loss of staff. The impact on any staff affected by any of the proposals regarding changes to working patterns, role or location will be analysed and any measures to mitigate that impact will be considered when the impact is known.
- 33. The services we provide. The LFC publishes a wide range of data about the services it provides. Raw data about incidents attended (since 2009), and the pumping appliances attending those incidents, is published on the London Datastore. Alongside this, the LFC publishes a wide range of data, at borough and ward level, to support its Statement of Assurance about the incidents we attend, attendance times for pumping and some special appliances, and the community and regulatory fire safety work carried out.

Appendix 1. Equalities Impact Assessment

Protected Characteristic	Impact: positive, neutral, or adverse	Reason for the impact	What information have you used to come to this conclusion?
Age (younger, older, or age group)	Positive	Though the use of online mediums will increase to broaden access to services, there will be no reduction in face-to-face services for those who are most vulnerable or have specific needs (e.g., at risk of digital exclusion). By making services more people centred and flexible to need, the Brigade will ensure that the most vulnerable in society and those who have specific needs can access services in a way that best suits them and release capacity to help support those who are at most risk of being a victim of fire or other risk.	LFB data shows that older people are more likely to be victims of fire and rescue service incidents and are particularly vulnerable to fires, with 85 per cent of fatal fires involving someone over the age of 50 and 65 per cent of fatal fires involving someone over the age of 65. Figure 7. in appendix 1. shows that those aged over 65 are evenly distributed across London. Table 1. confirms this with 49 per cent of over 65s living in urban areas which make up 30 per cent of London's area and 46 per cent of over 65s living in suburban areas. London's Population. The number of Londoners aged 65 or over is projected to increase by 86 per cent between 2019 and 2050, faster than younger age groups. Therefore, there will be a growing need for infrastructure that supports an ageing population, including accessible. London Data Store 2019: 12% of Londoners are 65+. 68% are 16-64 and 20% are 0-15. 45% of fires deaths are in the over 40 years bracket. (LFB FIRE FACTS Fire deaths in Greater London 2019). The LFB have profiled the next fire death victim as; "This is an older person aged 65 or over who lives alone. Where they live, or the type of property, does not matter. However, their home will be unsafe from the risks of fire and without adequate fire detection" (LFB FIRE FACTS - Fire deaths in greater London 2019)

Disability (physical, sensory, mental health, learning disability, long term illness, hidden)	Positive	This strategy will aid the Brigade to work better with partners at a local and pan-London level to help identify and tailor services for specific needs. This will mean a move from a one size fits all service to tailored services which a centred around individuals specific needs, that adapt as their needs change and are flexible to the different needs of individuals in society.	LFB's data shows that disability and poor mental health and mobility issues and taking prescription drugs increase your vulnerability to fire. Figure 4. in Appendix 1. shows that disability is distributed across London with a greater proportion in east London and the extreme west of London. Characteristics associated with disability are often found in older people who are found all over London and are proportional to the population density in each of the four neighbourhood impact zones. People with disability are also likely to be more economically deprived and as such have risk factors associated with deprivation. LFB's data shows that if you are economically deprived you are more likely to have a fire. There are several related reasons for this. Figure 3. shows that there are patches of deprivation across London with a bias towards the eastern side of London as well as some areas in Northwest London.
Gender reassignment (someone proposing to/undergoing/ undergone a transition from one gender to another)	Positive	By enhancing the way, the Brigade delivers its services so that they are flexible to a persons need and centred on the person the Brigade will be able to deliver a service that is tailored to the individual. This will be done through more localised service provision and greater use of online services to identify how an individual wants to receive a service. Additionally post service feedback will allow the Brigade to understand more about how to deliver its services to particular groups in the	There is no detailed data held by the Brigade in relation to gender reassignment and their vulnerability to incidents which the fire and rescue service would be expected to attend and therefore no assessment has been made. Research carried out in 2012 on the acceptability of gender identity questions in surveys provided an indicative estimate that 1 per cent of the UK population identify as trans. LGBT in Britain – Home and Communities' Report shows that: Half of Ethnically Diverse LGBT people (51 per cent) face discrimination within the LGBT community. More than a third of trans people (36 per cent), one in eight LGBT disabled people whose activities are 'limited a lot' (13 per cent), and one in five LGBT

		future and what more individuals need to feel safe as well as be safe.	people of non-Christian faith (21 per cent) say they have experienced discrimination from within the community because of different parts of their identities. Only half of lesbian, gay and bi people (46 per cent) and trans people (47 per cent) feel able to be open about their sexual orientation and/or gender identity to their whole family. A third of bi people (32 per cent) say they cannot be open about their sexual orientation with anyone in their family.
Marriage / Civil Partnership (married as well as same-sex couples)	Positive	All LFB services will be enhanced as part of the CRMP and as such the impact on married couples or people in civil partnerships will be positive. The Brigade will also be able tailor and target its services to people who live alone to help them take steps to be safer in their homes, their work and in public spaces.	LFB's data shows that being in a marriage or civil partnership generally decreases your risk from fire. As such those people who live alone and especially older people who live alone often have more risk factors making them more vulnerable to fire.

Pregnancy and Maternity	Positive	Enhancements to the way the Brigade uses its data and shares information with partners will help the Brigade to continually update its understanding or risk. This will mean that though someone who is pregnant or in a period of maternity is not going to always be at risk it is important for the Brigade to be able to provide services which help those within this group to feel and be safer. By making our services people centred and flexible to need and changing needs the Brigade will be able to provide improved measures to support this group.	Though no LFB data specifically relates to pregnancy or maternity risk factors associated with pregnancy and maternity such as reduced mobility and prescription drugs are known to increase an individual's risk to fire. Some mobility risks are borne from pregnancy hormones, which relax ligaments. Movement of organs to accommodate a growing baby can result in pressure on nerves and hips which in turn result in issues with mobility. Additional risks presented in relation to the unborn child. Removing the assumption that only heterosexual people will be categorised within this characteristic
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Race (including nationality, colour, national and/or ethnic origins)

Positive

The Brigade knows that some races have lower trust levels for LFB than others and as such may be less likely to engage with its services. This can have an adverse impact on safety for these groups. As such by using this information and working across services to improve engagement with all of London's diverse communities the Brigade can improve service outcomes for this group. By putting people at the centre of its services it will mean that the Brigade can allow groups to access it services in a way that suits them. Therefore, if a particular group does not openly engage with uniformed services it can tailor its service at a local level to enable groups to access the services they need in a most appropriate way.

57 per cent of Londoners are white British, white Irish or other white ethnicity, with the remaining 43 per cent having a black, Asian or minority ethnicity (BAME).

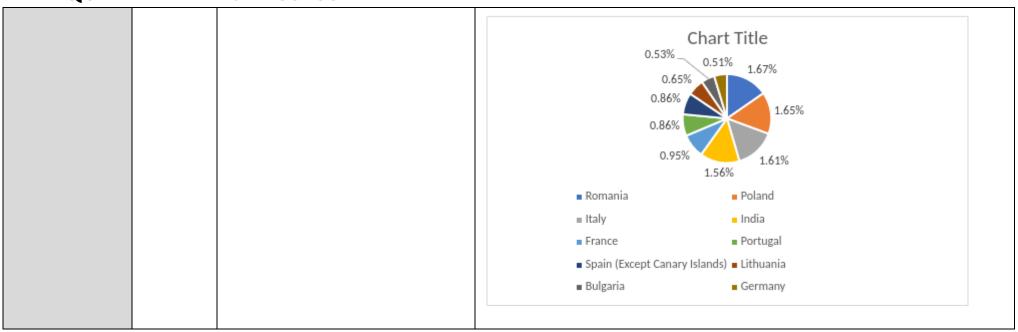
LFB's data shows that race does not have an impact on an individual's vulnerability to fire. The proportion of each category of race is relative to the size of that category's population in London. Though other risk factors such as economic deprivation and employment may be present in specific ethnic groups.

The 2011 census show that 1 in 10 London residents had migrated to the UK within the previous 5 years.

78% of London's population is made up people from the United Kingdom. Therefore, up to 22% may not speak English as a first or second language if at all.

Top 10 represented nationalities (Other than UK non-English speaking) in order in London and main dispersion areas:

- 1. Romania Northwest and Northeast
- 2. Poland Northwest and Southeast
- 3. Italy All, particularly Westminster, Kensington & Chelsea, Hammersmith & Fulham
- 4. India West and Northwest, Hounslow. Northeast Redbridge
- 5. France All
- 6. Portugal Outer London, Brent, and Lambeth
- 7. Spain All
- 8. Lithuania Outer, Greenwich
- 9. Bulgaria Haringey and Newham
- 10. Germany All



Positive

EQUALITY IMPACT ASSESSMENT

Religion or Belief
(people of any
religion, or no
religion, or
people who
follow a
particular belief
(not political)

As part of the service enhancements and new engagement services LFB will continue to develop community engagement groups with all diverse communities including faith groups. With services which are flexible to needs of different groups the Brigade will be able to respond to groups needs and target those which may not openly engage with the Brigade's services.

It is known that the lighting of candles, which can be related to religious activity can increase someone's risk to fire.

Additionally, large gatherings can increase someone's risk to certain incident types the likelihood of such incidents is relatively low.

The risk matrix shows that incidents in places of worship occur on average about once a month and result in one casualty every 10-25 incidents.

It is noted that some areas of London hold higher numbers of a particular religious group, for example Barnet has the highest Jewish community numbers and New Malden the highest Korean population. The views of each person are equally valued and that for proportion of views purposes it may be necessary to direct engagement in highest populated areas, this is not to suggest that the views are of lesser or more value. Nearly half of London's residents, 48 per cent, give their religion as Christian.

Muslims account for 14 per cent and all other religions total 12 per cent. People stating no religion make up the remaining 26 per cent. The proportion of Londoners who are Muslims or who have no religion has increased in recent years, while the proportion who are Christian has declined.

Sex (men and women)	Positive	The quality of all services will be enhanced through the combined projects which will be delivered through the CRMP and as such all Londoners will benefit from service enhancements. The LFB will continue to embed its togetherness strategy and ensure that any form of bias is not tolerated within the organisation.	LFB's data shows that men are 16 per cent more likely to be victims of fire than women with men making up 58 per cent of fire victims over the last 20 years. Men and women are relatively evenly distributed across London. In 2019, the GLA projects that 4.55 million Londoners are female and 4.55 million are male. Women face particular issues around gender-based violence and low pay. As most lone parents (90 per cent) are women, recent reforms to welfare that have affected lone parents have had a disproportionate impact on women. Women sharing other characteristics women often face additional challenges, such as higher gender pay gaps among older and BAME women. Young women report issues around financial pressures and mental health issues.
			Men face issues around lower educational attainment and are at higher risk of suicide and therefore may be more at risk to fire and other emergencies. Additionally, there is evidence that if men become single in later life, they may find it harder to care for themselves and more likely to undertake riskier behaviours.

Sexual Orientation (straight, bi, gay, and lesbian people)	Positive	Services will be flexible to the needs of all communities and local areas will be empowered to target their services at those who are most vulnerable within their communities. This will mean that areas where there is a high LGBYQ+ community will continue to receive high quality services and services will be able to adapt to their changing needs.	Two per cent of adult Londoners identify as gay or lesbian, higher than the UK rate of 1.3 per cent. A further 0.6 per cent identify as bisexual and 0.6 per cent as other sexual identities.15 A recent survey of the UK's LGBT population found that 40 per cent had experienced an incident such as verbal harassment or physical violence because they were LGBT, and that they had lower levels of life satisfaction than the general UK population. Only half of lesbian, gay and bi people (46 per cent) and trans people (47 per cent) feel able to be open about their sexual orientation and/or gender identity to their whole family. A third of bi people (32 per cent) say they cannot be open about their sexual orientation with anyone in their family.
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Goals for Reducing Straight Bias in Language:
Reducing straight bias and increasing visibility of lesbians, gay men, and bisexual persons. Lesbians, gay men, and bisexual men and women often feel ignored by the general media, which take the straight orientation of their readers for granted. Unless an author is referring specifically to straight people, writing should be free of straight bias. Ways to increase the visibility of lesbians, gay men, and bisexual persons include the following:
a. Using examples of lesbians, gay men, and bisexual persons when referring to activities (e.g., parenting, athletic ability) that are erroneously associated only with straight people by many readers.
b. Referring to lesbians, gay men, and bisexual persons in situations other than sexual relationships. Historically, the term same-sex attraction has connoted sexual activity rather than a general way of relating and living.
c. Omitting discussion of marital status unless legal marital relationships are the subject of the writing. Marital status per se is not a good indicator of cohabitation (married couples may be separated, unmarried couples may live together), sexual activity, or sexual orientation (a person who is married may be in a gay or lesbian relationship with a partner). Furthermore, describing people as either married or single renders lesbians, gay men, and bisexual persons as well as straight people in cohabiting relationships invisible.
d. Referring to sexual and intimate emotional partners with both male and female terms (e.g., "the adolescent males were asked about the age at which they first had a male or female sexual partner").

e. Using sexual terminology that is relevant to lesbians and gay men as well as bisexual and straight people (e.g., "when did you first engage in sexual activity" rather than "when did you first have sexual intercourse"). f. Avoiding the assumption that pregnancy may result from sexual activity (e.g., "it is recommended that women attending the clinic who currently are engaging in sexual activity with men be given oral contraceptives," instead of "it is recommended that women who attend the clinic be given oral contraceptives").
(e.g., "it is recommended that women attending the clinic who currently are engaging in sexual activity with men be given oral contraceptives," instead of "it is recommended that women who attend the clinic be given oral

The **purpose** of an SDIA is to give **as much information as possible** about potential sustainable development impacts, to demonstrate we meet related **legal requirements**, and align to related **LFB sustainability policies and targets**, and related **Mayoral strategies and targets**.

What is the name of the policy, project, decision, or activity? Community Risk Management Plan (CRMP).

Overall Sustainable Development Impact of this policy, project, decision, or activity (see instructions at end of SDIA to complete):

High	Medium		Low	х
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2. Contact details	
Name of SDIA author	
Department and Team	Strategy and Risk; Technical and Commercial
Date of SDIA	02/03/2022

3. Aim and Purpose	
What is the aim and purpose of the policy, project, decision, or activity?	The aim of the project is to develop a new Community Risk Management Plan (CRMP) formerly known as London Safety Plan and in many other fire rescue services an integrated risk management plan (IRMP). We are required by the Fire and Rescue National Framework for England to produce an integrated risk management plan (IRMP). We will be referring to our integrated risk management plan as a community risk management plan (CRMP), in accordance with the National Fire Chiefs Council, which has adopted the term as a generic name for the risk plans required by fire and rescue services across the UK. This SDIA is aimed at assessing the potential impacts, positive, neutral, and negative that relate to the sustainable development targets, strategies, and policies of the LFC and Mayor of London.
	Our CRMP will:

	Be framed by our purpose (trusted to serve and protect London), as defined in the Transformation Delivery Plan (TDP);
	Set out our strategy for delivering the Target Operating Model (TOM) that will achieve the vision described in the TDP by 2026;
	Be service-led and co-created with communities and staff;
	Incorporate the intentions in the TDP into the changes required to achieve the vision (so the CRMP will replace both the TDP and the LSP 2017);
	Incorporate the improvements needed in response to the learning from the Grenfell Inquiry and HMI recommendations;
	Set out the case for our budget requirements.
Who is affected by this	The communities of London
work (all staff, specific	 Partner agencies and organisations.
department, wider	 All Staff groups, operational, FRS, Control etc.
communities?)	 Neighbouring six FRSs.
What consultation has	
taken place to support	
you to predict the	
Sustainable	
development impacts of	
this work?	

What we know about sustainable development risks in London?

The table below sets out the themes as identified in the LFC's sustainable development framework, headline performance of those themes in London, and where measured the LFCs performance.

4. Sustainable Development considerations: the SDIA must be based on evidence and information.

Low air emissions from vehicles and travel

The quality of London's air is poor and damaging pollutants harm human health and quality of life. Annually over 9,000 Londoners' lives end sooner than they should because of air pollution. The main sources of emissions are from: transport, heating systems, construction.

https://www.london.gov.uk/what-we-do/environment/london-environment-strategy

14% of LFBs fleet was zero emission capable. By 2030 the aspiration is that 100% of the fleet is zero emission capable. This is according to the Mayor's plan, we work to support <u>LFB Sustainable Development Annual</u> <u>Report 2020/21</u>

Reduced consumption of resources

Reservoir levels in London are down, although within historically normal fluctuations: Lower Lee 86%, Lower Thames, 91%. England, particularly the southeast is predicted to have significant supply deficits by 2050, without reduced demand from the average of 140L per day.

https://www.london.gov.uk/about-us/organisations-we-work/london-sustainable-development-commission/our-current-work-and-priorities/our-work-un-sustainable-development-goals pg31
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment data/file/709924/State of the environment water resources report.pdf

At the time of writing. London is experiencing a substantial drought.

LFB Sustainable Development Annual Report 2020/21

LFB consumes 117km³ of water at its premises in the average year. With some 5,800 staff, this equates to 20m3 per employee or 55L per day.

Waste minimisation

London produces 7million tonnes of waste from London's homes, public buildings, and businesses, with only 41 per recycled. Landfill capacity is set to run out by 2026.

https://www.london.gov.uk/what-we-do/environment/london-environment-strategy

<u>LFB Corporate Digest</u> <u>LFB Sustainable Development Annual</u> <u>Report 2020/21</u>

https://www.ipcc.ch/sr15/
https://www.london.gov.uk/what-we-do/environment/london-environment-strategy
LFB Performance Report
LFB Sustainable Development Annual Report 2020/21 GLA Pathways to Net Zero Carbon by 2030
https://designatedsites.naturalengland.or g.uk/
https://www.london.gov.uk/about-us/organisations-we-work/london-sustainable-development-commission/our-current-work-and-priorities/our-work-un-sustainable-development-goals pg35 https://www.london.gov.uk/what-we-do/environment/london-environment-strategy

IED describes a section of the second describes of the	T
LFB does not have a performance metric related to	
this theme.	
Adapting to a Changing Climate	
London is expected to suffer from more intense	https://www.london.gov.uk/what-we-
storms, increased risk of flooding, especially surface	do/environment/london-environment-
water flooding, increased risk of drought and water	strategy
shortages, increased heat waves, and compromised	
access to clean water because of a changing climate.	
access to cream water accease of a changing chimater	
LFB does not have a performance metric related to	
this theme.	
Pollution prevention	
The health of London's water bodies is a concern,	https://www.london.gov.uk/about-
they are rated as Good: 1, Moderate: 32, Poor:5,	us/organisations-we-work/london-
Bad:3.	<u>sustainable-development-</u> <u>commission/our-current-work-and-</u>
	priorities/our-work-un-sustainable-
LFB does not have a performance metric related to	development-goals pg31
this theme.	
London Living Wage	
In London there is a long-term trend of in-work	https://www.london.gov.uk/about-
poverty, where wages do not reflect the true cost of	us/organisations-we-work/london-
living. 28% of Londoners live in relative poverty, with	sustainable-development-
17% of people facing persistently low incomes,	commission/our-current-work-and- priorities/our-work-un-sustainable-
despite a long-term reduction in unemployment rates	development-goals pg40-41
prior to Covid-19, as well as a steady rise in zero-	
hours contracts to 2.5%. Covid-19 eroded the	
financial stress, placing 4.2m more people in the UK	
in serious financial stress (running out of money by	
the end of the week). Universal Credit claims in	
London doubled between March and November;	
however, the poorest boroughs saw around five	
times more new claims than the wealthiest.	
The state of the s	LFB Corporate Digest
138 Contractors staff working at LFB properties were	LFB Sustainable Development Annual Report 2020/21
paid the LLW in 2020/21. No LFB staff are on pay	
rates below the LLW.	
Skills and employment	
London's unemployment rate is 5.3%, and the ratio of	https://www.london.gov.uk/about-
income inequality between the top and bottom	us/organisations-we-work/london-
deciles of household income is 10.	<u>sustainable-development-</u> <u>commission/our-current-work-and-</u>
	priorities/our-work-un-sustainable-
	development-goals pg32
	LFB Corporate Digest

LFB had 237 staff and 11 supply chain apprenticeship starts in 2020/21.	LFB Sustainable Development Annual Report 2020/21
Financial sustainability	
The Mayor of London's budgets for 2020-2022 were repurposed to identify savings of £493, based on the most likely scenario of income losses.	https://www.london.gov.uk/sites/default/files/mayors final budget 2021-22.pdf pg4
LFB achieved the Mayor's financial savings target of £3.4m for 2020/21, set prior to the Mayor's review of the budget in light of the impact of COVID-19.	LFB Financial Position
Ethical trade The Global Slavery Index estimates the number of victims of modern slavery in the UK at 136,000. Key risk sectors for public procurement are construction, electronics, and the service sector.	https://www.globalslaveryindex.org/2018 /methodology/prevalence/ UK government modern slavery statement
LFB does not have a performance metric related to this theme.	
Whole life costing	
This is a process to reduce impacts, and not a risk.	
Protecting the built environment and heritage	
There are 618 Grade I heritage and 1478 Grade II* and 17335 Grade II listed buildings in London.	https://historicengland.org.uk/
LFB does not have a performance metric related to this theme.	
Procuring innovation	
This is a process to reduce impacts, and not a risk.	
Equality and diversity of staff This section is addressed in detail through the Equalities Impact Assessment.	
Understanding and responding to the communities	
we serve	
This is a process to reduce impacts, and not a risk.	
Supply chain diversity	
Covid has impacted people from Black, Asian and minority ethnic (BAME) communities, women, and those with low incomes the hardest. In London disabled people are twice as likely to be unemployed (8.2%), Black men are three times as likely to be unemployed (11%). The mean gender pay gap is 20.4%.	https://www.london.gov.uk/about- us/organisations-we-work/london- sustainable-development- commission/our-current-work-and- priorities/our-work-un-sustainable- development-goals pg50

98% of UK businesses are SMEs, accounting for 60% of employment, London has some 1.1m businesses of which 99% are SMEs.	https://www.gov.uk/government/statistic s/business-population-estimates- 2019/business-population-estimates-for- the-uk-and-regions-2019-statistical- release-html
	LFB Performance Report
LFBs spend with SME's was last reported as 41.3%.	
Staff health, Safety and Wellbeing	
A Health & Safety at Work Impact Assessment HSWIA has been conducted to support the CRMP and is included as an appendix.	H&S at Work Impact Assessment
LFB reported 56 RIDDOR events, and 5.6% of shifts/days lost to sickness by operational staff.	LFB Performance Report

SDIA Signed off	
Name of SDIA author	
Department and Team	Strategy and Risk; Technical and Commercial
Date of SDIA	02/03/2022
First Sign off Date	

What do we know about the CRMP proposals?

5. Assessing Sustainable Development Impacts – LFB/London

Use this section to record the impact the proposals might have on improving the sustainability of London.

Sustainability theme	Impact: positive, neutral, or	Reason for the impact	What information have you used to come to this conclusion?
	adverse		to this conclusion:
Environment and Climate			
Change			
Low air emissions from	The plan	CRMP is an overarching strategy which sets	There are several proposals in the plan that it is
vehicles and travel	aspires to	out to support the Mayor's ambitions for	hoped will improve our sustainability
Reduced consumption of	improve	sustainability and the environment' and	performance but that the specifics of each
resources	sustainability	recognises concerns expressed by the public	initiative cannot be assessed in detail at this time.
Waste minimisation	and support	about climate change and the impact it may	A sustainability Impact Analysis, like this, is
Low carbon buildings	the Mayor's	have on their safety.	expected at the start of all initiatives and that is
and equipment	aspirations		where the management of any negative impact
Protecting the natural	for London.		of our proposals will be considered and managed.
environment	Until we		
Adapting to a Changing	work through		
Climate	each		
Pollution prevention	initiative, it		
Economic Value	will be		
London Living Wage	difficult to be		
Skills and employment	certain about		

Financial sustainability	the impact of
Ethical trade	that initiative
Whole life costing	
Protecting the built	
environment and	
heritage	
Procuring innovation	
Equality and Inclusion	
Equality and diversity of	
staff	
Understanding and	
responding to the	
communities we serve	
Supply chain diversity	
Staff health, safety, and	
Wellbeing	

7. Relevant legal requirements, policies, targets, and strategies				
How does this work help LFB to:				
Modern Slavery Act	Reduce the risk of modern slavery in the LFCs supply chain, in particular assurance of compliance by Large Suppliers with a turnover of £36m+, and their provision of an annual modern slavery statement.			
Social Value	Consideration of how social, economic, and environmental social value can be delivered through procurement.			
London Environment Strategy	Sets out a range of policy areas that LFB is expected to contribute to as detailed in the Single Environment Plan for actions to 2025, in particular:			
Air Quality – LES Targets	 all cars in GLA group support fleets being zero emission capable by 2025; 			

	 all new cars and vans (less than 3.5 tonnes) in GLA group fleets, including response vehicles, being zero emission capable from 2025; all heavy vehicles (greater than 3.5 tonnes) in GLA group fleets being zero emissions capable or fossil fuel-free from 2030; zero emission GLA fleets by 2050.
Green infrastructure - LES	 To manage our estate in a way that delivers net gain for biodiversity through implementing sustainable drainage systems, planting trees and gardens, and installing green roofs
Climate Change mitigation and energy -	Reduce our CO2 emissions by 60% from 1990 levels by 2025
LES	Achieve Net Zero CO2 by 2030
Waste - LES	By 2026 no biodegradable or recyclable waste sent to landfill.
	 Cutting waste and achieving recycling rates of 65% by 2030
	Reducing single use packaging
Adapting to climate change - LES	 Ensure that we have the capacity to respond to the challenges posed by climate change

8. Mitigating and justifying impacts

Where an adverse impact has been identified, what steps are being taken to mitigate it? If you are unable to mitigate it, is it justified?

Theme	Action being taken to mitigate or justify	Lead person responsible for
		action
CRMP is an overarching strategy which sets out	There are several proposals in the plan that it is hoped	This will be the relevant head
to support the Mayor's ambitions for	will improve our sustainability performance but that	of service responsible for the
sustainability and the environment' and	the specifics of each initiative cannot be assessed in	initiative.
recognises concerns expressed by the public	detail at this time. A sustainability Impact Analysis, like	
about climate change and the impact it may	this, is expected at the start of all initiatives and that is	
have on their safety.	where the management of any negative impact of our	
	proposals will be considered and managed.	

SDIA Signed off	
Name of SDIA author	
Department and Team	Strategy and Risk; Technical and Commercial
Date of SDIA	
Second Sign off Date	

Now complete the RAG rating at the top of page 1:

High: as a result of this SDIA there is evidence of significant adverse impact. This activity should be stopped until further work is done to mitigate the impact.

Medium: as a result of this SDIA there is potential adverse impact against one or more groups. The risk of impact may be removed or reduced by implementing the actions identified in box 8 above.

Low: as a result of this SDIA there are no adverse impacts predicted. No further actions are recommended at this stage.

Health, Safety and Welfare Impact Assessment

Part 1: Project/Policy description

Name or Title of Policy/Project and Reference Number (if available):

Please attach the policy documents to the HSWIA Community Risk Management Plan

Purpose of Policy/Project:

Provide a brief description

The aim of the project is to develop a new Community Risk Management Plan (CRMP) formerly known as London Safety Plan and in many other fire rescue services an integrated risk management plan (IRMP).

We are required by the Fire and Rescue National Framework for England to produce an integrated risk management plan (IRMP). We will be referring to our integrated risk management plan as a community risk management plan (CRMP), in accordance with the National Fire Chiefs Council, which has adopted the term as a generic name for the risk plans required by fire and rescue services across the UK.

Our CRMP will:

Be framed by our purpose (trusted to serve and protect London), as defined in the Transformation Delivery Plan (TDP);

Set out our strategy for delivering the Target Operating Model (TOM) that will achieve the vision described in the TDP by 2026;

Be service-led and co-created with communities and staff;

Incorporate the intentions in the TDP into the changes required to achieve the vision (so the CRMP will replace both the TDP and the LSP 2017);

Incorporate the improvements needed in response to the learning from the Grenfell Inquiry and HMI recommendations;

Set out the case for our budget requirements.

Part 2: Risk assessment

Have Health and Safety risks associated with your project/policy been considered?		No
(Health and safety risks associated with the release of a new policy or project must be considered at an early stage of the project or policy development and might be subject to consultation. Consider early staff-side involvement)		
Have you identified significant hazards and or health and safety risks?		
(A risk assessment is required if the policy or project has hazards that introduce significant risks of injury or ill health to employees and/non LFB employees that require risk reduction measures)		

Health, Safety and Welfare Impact Assessment

1. If significant H&S risks were identified:

- a. Record the findings of the risk assessment using the appropriate LFB risk assessment form and following the guidance provided in PN673 Risk assessment procedure.
- b. Submit the HSWIA and risk assessment to Health and Safety for review and consultation with staff side at BJCHSW.
- 2. If <u>no significant risks were identified</u> during the risk assessment process, it is not necessary to record the finding of the risk assessment. Please submit the HSWIA to Health and Safety for review.

Comments:

Health and Safety risks have been considered, however as this programme will not be making changes to policy this box has remained unchecked. Any subsequent changes to policy following this CRMP should require their own specific HSWIA.