

REQUEST FOR DEPUTY MAYOR FOR FIRE AND RESILIENCE DECISION – DMFD220

Title: Urban Firefighting Training

Executive summary:

This report requests the approval of the Deputy Mayor for Fire and Resilience to authorise the London Fire Commissioner (LFC) to commit expenditure as set out in part 2 of the report for the purposes of the development of an Urban Firefighting course.

The London Fire Brigade (LFB) needs to invest in training for fighting fires to achieve the industry standard, and comprehensively deliver on the recommendations of the His Majesty's Inspectorate of Constabulary and Fire & Rescue Services and learning from major incidents including the Grenfell Tower fire. LFB has a good baseline level of training but it requires a radical overhaul to ensure it meets the demands of an emergency service responsible for the safety of a global city. It is clear from experiences over the last few years that LFB's training is no longer aligned to the risks faced today, or those anticipated for the future, so it requires significant investments and resource to address this gap.

The report details the cost of upskilling operational staff to carry out tactical ventilation to control fire behaviour, and the use of a technique known as Positive Pressure Ventilation. The report also explains the next steps for developing this core skills course into a modern, future-proofed training Centre of Excellence in partnership with LFB's training partner, Babcock Training Limited (BTL).

The London Fire Commissioner Governance Direction 2018 sets out a requirement for the London Fire Commissioner to seek the prior approval of the Deputy Mayor before "[a] commitment to expenditure (capital or revenue) of £150,000 or above as identified in accordance with normal accounting practices...".

Decision:

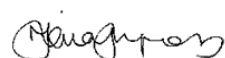
That the Deputy Mayor for Fire and Resilience authorises the London Fire Commissioner to commit expenditure of the amount set out in Part Two of this report for a) the introduction of an Urban Firefighting course for firefighters and fire behaviour training for trainee firefighters, and b) the procurement of Positive Pressure Ventilation fans and ancillary equipment for fire appliances.

Deputy Mayor for Fire and Resilience

I confirm that I do not have any disclosable pecuniary interests in the proposed decision.

The above request has my approval.

Signature:



Date:

06/12/2023

PART I – NON-CONFIDENTIAL FACTS AND ADVICE TO THE DEPUTY MAYOR

Decision required – supporting report

1. Introduction and background

- 1.1. Report LFC-23-108y to the London Fire Commissioner (LFC) explains that the London Fire Brigade (LFB) training offer, whether provided by Babcock Training Limited (BTL) or through local delivery, requires a radical overhaul to ensure it meets the demands of an emergency service responsible for the safety of a global city. LFB currently has a good baseline level of training provision, but it is clear from experiences over the last few years that it is no longer aligned to the risks faced today, or those anticipated for the future, so it requires significant investments and resource to address this gap.
- 1.2. There is demonstrable evidence that failure to understand fire behaviour and adapt to changing circumstances leads to accidents, injuries, and firefighter fatalities. This evidence is detailed in Appendix 1 of report LFC-23-108y.
- 1.3. The London Fire Brigade (LFB) Community Risk Management Plan (CRMP) ‘Your London Fire Brigade’ was published on 1 January 2023. The CRMP describes four pillars that the Brigade will work to over the life of the plan, from which derive eight commitments to London and Londoners.
- 1.4. The Delivery Plan for the CRMP explains how LFB will achieve those commitments. The commitment to ‘adapt our services as your needs change’ is delivered through modern fire and rescue technology, training, and tactics. Introducing Positive Pressure Ventilation (PPV) and building on this skill to a point where LFB can deliver a broader Urban Firefighting Course which replicates the scale and complexity of London incidents is critical to achieving this aim.
- 1.5. LFB’s Assessment of Risk notes fire involving purpose-built flats and fire involving houses and bungalows as the highest likelihood risks, with most serious consequences. The Urban Firefighting Course is listed as part of the mitigation for these risks, by ensuring ‘*that our firefighters have the necessary skills, equipment and vehicles to protect London, its people, and to work safely*’ and allowing us to ‘*adopt the most modern fire and rescue technology and tactics, to enable us respond better to all types of emerging risks*’.
- 1.6. Understanding fire behaviour and its relationship to building construction is essential for firefighters to stay safe, be effective and save life. Fighting fires in the complex and changing built environment has become more challenging. An agile training strategy about fighting fires is required to ensure operational staff are competent in understanding fire behaviour and applying appropriate tactics in this environment.
- 1.7. The Grenfell Tower Inquiry recommended that LFB ‘develop policies and training to ensure better deployments and use of resources’ and ‘that all fire and rescue services ensure that their personnel at all levels understand the risk of fire taking hold in the external walls of high-rise buildings and know how to recognise it when it occurs’. LFB has addressed these recommendations, primarily through the introduction of new firefighting procedures for high-rise buildings; the proposals in this paper will enhance LFB’s capabilities further in this area.
- 1.8. The Lakanal House Rule 43 letter to the LFB recommended training on how ‘to anticipate that a fire might behave in a manner inconsistent with the compartmentation principle and ‘to be aware of the risks to those above and adjacent to the fire flat’. This proposal provides the opportunity to deliver this training in real fire environments that replicate the scale and complexity of that incident, rather than as theory-based training. It also provides a mechanism to sustain the learning from the Lakanal House fire.
- 1.9. His Majesty’s Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) also recognised in broader terms the need to modernise LFB’s operational response to improve service to Londoners. In their last inspection of LFB in 2021/22 they found that:

- The Brigade should make sure it puts in place and delivers a plan to adopt NOG.
 - The Brigade should make sure its response strategy provides the most appropriate response for the public in line with its integrated risk management plan.
 - The Brigade needs to train all staff properly for their roles.
- 1.10. Training must include the opportunity for staff to undertake a learning experience where they can make mistakes in a safe environment, practice their skills in realistic conditions with the appropriate level of scale and challenge and where those skills can be assessed and assured.
- 1.11. Transforming LFB into a modern fire service which uses the latest firefighting technology requires a training venue and training course which delivers realistic, challenging environments beyond what is currently provided by LFB's facilities.
- 1.12. In planning the Urban Firefighting Course, LFB has reviewed current delivery of training against the industry standard (National Operational Guidance [NOG]). This course will allow LFB to train staff in NOG training specifications currently not achievable at existing training venues.
- 1.13. Specifically, this skills gap relates to firefighter's understanding of tactical ventilation to control fire behaviour, and the use of a technique known as Positive Pressure Ventilation (PPV). PPV is used by Fire Services worldwide to control the environment within a structure that is on fire or filled with hazardous fumes. Firefighters manipulate ventilation flow paths in a building to influence fire behaviour, often using mechanical fans to assist.
- 1.14 LFB's corporate risk register identifies a range of risks that can be mitigated by progressive, realistic, and challenging fire behaviour training. These risks are set out below, noting the ways in which the proposals address the risk (a full breakdown of these risks is detailed in Appendix 2 of report LFC-23-108y):
- Failure to achieve minimum service standards delivery (NOG) places the wider community at risk. This proposal will address this gap.
 - Failure to identify organisational learning through investigation and review of the LFB's response to the Grenfell Tower fire means that poor performance is repeated in the future exposing staff and public to unacceptable safety hazards. This course progresses the work already carried out in response to Phase 1 of the Grenfell Tower Inquiry and provides a vehicle to sustain change.
 - The Grenfell Tower Public Inquiry results in further conclusions about LFB policies or actions which reduce staff or public confidence. This course addresses some of the anticipated outcomes of Phase 2 of the Grenfell Tower Inquiry.
 - LFB's leadership is not sufficiently focused on delivering an effective and improving safety culture to prevent injuries and ill health. Investing in risk critical staff training, and providing modern techniques and technologies demonstrates a commitment to a health and safety culture.
 - Failure to identify high impact, low frequency events and train for them which exposes the safety of our staff their competence to deal with them. A modern, flexible training facility provides the vehicle to train staff on incident types which replicate the complexity and scale of the risk in London. This is currently not possible at LFB's existing venues.
 - In an emergent and unregulated alternative fuels market, the Brigade is unable to keep pace with new fire and rescue responses to alternative fuel technology applications, complex fire dynamics and commercial uptake which potentially exposes the safety of our staff and the public at incidents. The facilities provided by this new training initiative provide the flexibility and realism to test and train on new and emergent risks.
 - Lack of support afforded to trainees during their apprenticeships leaves trainees isolated from the

Brigade and at risk from harm, from the start of their career journey at training school through to end point assessment. This proposal creates a bespoke two-day advanced fire behaviour course for trainees, which will support trainees in their journey onto station.

2. Objectives and expected outcomes

- 2.1 The objective of this report is to approve expenditure on introducing a real fire training course at a training venue where products of combustion can vent outside of the fire compartment. This course will be delivered to 4,320 fire station-based operational staff.
- 2.2 The delivery of this course represents an increase in the training delivery to operational staff, and as such capacity for staff release is an important factor. There are a range of measures that LFB has considered to manage capacity challenges, including the phasing of the training, improving efficiencies in existing training delivery and the training plan for 2024/25.
- 2.3 A breakdown of the cost of this proposal is detailed in Part Two of the report in the Financial Comments section. The different elements of the expenditure are on the following:
 - Acquisition training (Including instructors, training venue, subsistence, Personal Protective Equipment (PPE), cylinder recharging, appliances and accommodation)
 - Capital costs of positive ventilation fans
 - Appliance modification
 - Fan Maintenance (whole life cost of 5 years)
 - Staffing (Senior Project Manager & Project Manager)
- 2.4 The equipment includes one positive pressure ventilation fan for each of LFB's 143 appliances and associated ancillary equipment, as well as a 10% reserve of equipment and six fans for training purposes. The cost of modifying the appliances and servicing the equipment for its whole life is also included.
- 2.5 Delivery of this course and capability will mitigate a range of corporate risks, as detailed in Report – LFC-23-108y Appendix 1.
- 2.6 Initially, this will be a two-day course focused on introducing Positive Pressure Ventilation (PPV) for all operational staff. Training for this core skill cannot currently be carried out in London. PPV is a skills requirement within N.O.G and is a foundation skill from which more complex and challenging training can be built.
- 2.7 Training will be rolled out by borough over a two-year period. The order in which boroughs will participate in training will be based on the historic risk of fire in that borough.
- 2.8 This proposal is included in LFB's 2023-26 Training Plan (LFC-23-073) under Phase 1 of the 'Transforming our Future' section, which is a growth bid. Babcock Training Limited (BTL) have committed to delivering the volume of courses alongside existing courses within the framework of the training contract.
- 2.9 Firefighters on development will also receive a separate two-day advanced fire behaviour course.
- 2.10 It is proposed this training takes place at the Fire Service College (FSC), delivered via the BTL training contract. The FSC has the capacity and facilities to deliver on the course requirements.

- 2.11 Work has been undertaken in partnership with BTL to investigate suitable training venues. This established that it is not possible to build a venue within London that meets the requirements of the course.
- 2.12 Venues outside of London in close enough proximity to facilitate the course were also considered. These included West Midlands Fire and Rescue Service, Northamptonshire Fire and Rescue Service and the services bordering London. However, these are unable to manage the capacity that would be required alongside their own training needs; others would not be able to deliver the required learning outcomes.
- 2.13 It is proposed that the existing two-day firefighting course delivered within London is reduced to one day, with content focused on foundation knowledge. This recognises that more advanced real fire training is delivered on the Urban Firefighting Course and delivers saving in Training Units equivalent to £2,328,300 per year.

Funding and future development

- 2.14 In order to truly realise its ambition to become a leading fire and rescue service in modern firefighting technologies and tactics, LFB must continue to train staff in complex and challenging real fire environments.
- 2.15 Due to the large-scale investment required in this area and past decisions made around training provision (notably the outsourcing to BTL in a long-term contract), it will not be achievable for LFB to deliver the level of capability uplift required from existing revenue budgets and also to deliver a balanced budget, without making significant reductions to services.
- 2.16 Therefore, at this point the LFB is proposing an investment bid to fund additional firefighter training to ensure modern day standards are upheld. The funding for this bid is subject to commercial sensitivities, and as such is detailed in Part Two.
- 2.17 After the delivery of the PPV course, LFB will look to build on the establishment of this core skill, as well as continue to deliver Continuous Professional Development.
- 2.18 This will take place in year three and will be delivered in partnership with BTL to develop the best commercial model which considers the need to minimise up front capital required from LFB, provide an exceptional bespoke urban training environment and balance the best value for money solution with an appropriate return for Babcock. This is intended to move LFB away from the Fire Service College and into its own facility.
- 2.19 As detailed in 2.12, LFB have identified the training unit equivalent of £2,328,300 efficiencies in training to support this. Over the longer term, LFB will look for support from central and local government to sustain this investment.

3. Equality comments

- 3.1 The LFC and the Deputy Mayor for Fire and Resilience are required to have due regard to 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 different people, taking this into account and then evidencing how decisions were reached.
- 3.2 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.
- 3.3 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.

- 3.4 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.
- 3.5 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.
- 3.6 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.
- 3.7 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.
- 3.8 LFB has conducted an Equality Impact Assessment (EIA) for this proposal. This has identified that there are a number of impacts and opportunities for this proposed course. For instance, as this is a residential course it will impact on people with caring responsibilities. Data indicates that women are proportionately more likely to be carers than men, so would be disproportionately affected. There is also an opportunity here to consider gender neutral facilities in the selection of training venue. The design of the course provides an opportunity to mitigate some of these impacts, such as thorough course planning (providing advance notice of any training) and selection of facilities.
- 3.9 The course's aim is to align LFB operational staff with modern, national standards of fire behaviour and fire equipment, which means that it will result in saving lives of Londoners more efficiently. That means that the course has potentially highly positive impact on the LFB customers (London communities) and LFB staff (less risk and fewer injuries). In particular, the residents of high rise buildings and social housing, who are often immigrants and non-English speakers, but also those who are fragile, like the elderly and people with disabilities, meaning that this provides positive opportunities.
- 3.10** The EIA that has been produced is an initial assessment to identify potential impacts in securing the budget to design and deliver this course. This will continue to be developed in partnership with Inclusion colleagues as the course design matures to ensure as far as possible that the training is accessible to all relevant staff groups, and the opportunities of its delivery are fully realised for both staff and Londoners.

4. Other considerations

Workforce comments

- 4.1 Workforce engagement indicates that investment in training is welcomed, as is the implementation of modern firefighting technology and tactics. Trade Unions, in particular the Fire Brigades Union (FBU) and Fire Officers Association (FOA), which represent the majority of station-based staff and officers, will require significant consultation as part of the course development, and will require a place on the project board.

Procurement comments

- 4.2 The procurement process for the equipment required to deliver this course will be carried out by Babcock Critical Services and will be carried out under a competitive tender process. This will follow the usual process, where Babcock will produce a Tender Specification which details all the LFB requirements and gives them a score, which relates to the importance that the feature. In the case of PPV, this will be procured from a Framework.
- 4.3 Once the tenders are received, they will be scored using the scores detailed in the tender specification. Additional scores will be included which cover the company's financial standing and ability to support the product over its expected life. In this case it would be a five-year operational life. The scoring is divided between technical compliance and financials, with a ratio of 60 per cent of the score attributed to the procurement and financial aspects, with 40 per cent on the products engineering aspects. The scoring process involves Operational Policy and Assurance, FLEET and Babcock.
- 4.4 The product that scores the highest will usually be the one that is accepted; however, operational tests are also carried out which may highlight issues or concerns which might override the highest scoring product. Babcock will negotiate the contract to supply the product with the selected supplier and will manage the ongoing support and repair of the product for the full operational life. The cost of this is covered within the slot price, which must be agreed as part of the procurement process.
- 4.5 The provision of training will be delivered by the Brigade's training partner, BTL, and will be delivered within the Framework of the training contract.

Conflicts of interest

- 4.6 There are no conflicts of interest to declare from those involved in the drafting or clearance of this decision.

5. Financial comments

- 5.1 Proposals for investment by LFC in urban firefighting capability are set out in LFC's draft budget, which is currently being considered as part of the GLA's budget-setting processes. The proposals set out in this paper form part of the wider investment proposals. Specific financial comments about these proposals are subject to confidentiality restrictions and are therefore included in Part Two of this report.
- 5.2 There are no direct financial implications for the GLA.

6. Legal comments

- 6.1 This report seeks approval for training of operational staff in Positive Pressure Ventilation, as part of a suite of Urban Firefighting skills.
- 6.2 By virtue of section 9 of the Policing and Crime Act 2017, the LFC was established as a corporation sole with the Mayor appointing the occupant of that office. Under section 327D of the GLA Act

1999, as amended by the Policing and Crime Act 2017, the Mayor may issue to the Commissioner specific or general directions as to the manner in which the holder of that office is to exercise his or her functions.

- 6.3 By direction dated 1 April 2018, the Mayor set out those matters, for which the LFC would require the prior approval of either the Mayor or the Deputy Mayor for Fire and Resilience (the "Deputy Mayor"). Paragraph (b) of Part 2 of that direction requires the Commissioner to seek the prior approval of the Deputy Mayor before "[a] commitment to expenditure (capital or revenue) of £150,000 or above is identified in accordance with normal accounting practices...". Funding for the Urban Firefighting Course, as detailed in this report, exceeds the specified limit and, as such, requires prior approval of the Deputy Mayor.
- 6.4 Under section 1 of the Fire and Rescue Services Act 2004 ('the 2004 Act'), the LFC is the fire and rescue authority for Greater London. Section 7(2) of the 2004 Act, requires the LFC to secure provision of the necessary training for personnel to discharge the duty of firefighting.
- 6.5 On 14 June 2017, a fire at Grenfell Tower claimed the lives of 72 people. The subsequent inquiry – The Grenfell Tower Inquiry ('GTI') established under the Inquiries Act 2005 – was heard in two parts and examined factors leading to and causative of the fire. Phase one examined the events on the night of the fire, how it was handled by the emergency services and how the building behaved in the fire.
- 6.6 Recommendation 5 of the GTI Phase One report cites LFB's high-rise policy PN633, and modifications required therein, to avoid events on the night of Grenfell Tower being repeated in future. Training of operational personnel in Urban firefighting techniques form part of the skills covered by PN633.
- 6.7 In the 2018/19 inspection report on LFB by His Majesty's Inspectorate of Constabulary and Fire and Rescue Services alignment of policies with National Operational Guidance was referenced. Training in Urban Firefighting is in part fulfilment of this objective.
- 6.8 These comments have been adopted from those provided by the LFC's General Counsel Department in report LFC-23-108y to the LFC.
- 6.9 Additional legal comments are set out in Part Two of this report.

Appendices and supporting papers:

Appendix 1 – London Fire Commissioner Report LFC-23-108y – Urban firefighting Training

Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FOI Act) and will be made available on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary. **Note:** This form (Part 1) will either be published within one working day after approval or on the defer date.

Part 1 Deferral:

Is the publication of Part 1 of this approval to be deferred? NO

Part 2 Confidentiality: Only the facts or advice considered to be exempt from disclosure under the FOI Act should be in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a part 2 form – YES

ORIGINATING OFFICER DECLARATION:

Drafting officer to confirm the following (✓)

Drafting officer

Richard Berry has drafted this report with input from the LFC and in accordance with GLA procedures and confirms the following:

✓

Assistant Director/Head of Service

Niran Mothada has reviewed the documentation and is satisfied for it to be referred to the Deputy Mayor for Fire and Resilience for approval.

✓

Advice

The Finance and Legal teams have commented on this proposal.

✓

Corporate Investment Board

A summary of this decision was reviewed by the Corporate Investment Board on 4 December 2023.

✓

INTERIM CHIEF FINANCE OFFICER:

I confirm that financial and legal implications have been appropriately considered in the preparation of this report.

Signature:



Date:

04/12/2023