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| Zack Polanski  Chair of the Fire Committee  City Hall  Kamal Chunchie Way  London  E16 1ZE | The London Fire Commissioner is the  fire and rescue authority for London  Date: 04 June 2025 |

Dear Chair,

I am writing in response to the Fire Committee’s report: ‘Action and ambition: London Fire Brigade’s (LFB) culture' which was published in April 2025. I, alongside the current Commissioner and our wider leadership team, have carefully considered the report and its ten recommendations and our response is set out below.

**Recommendation 1 - Firefighters must be able to trust the Professional Standards Unit (PSU). London Fire Brigade should assure the independence of the complaints and investigations element of the PSU by creating a new independent Standards Commissioner responsible for oversight of the PSU separate from normal lines of reporting within London Fire Brigade.**

I would like to assure the Committee that improving trust and confidence in the Professional Standards Unit (PSU) is a key priority for LFB. We recognise that it will take time for the PSU to continue to embed since it was established in January 2024, and we remain committed to working with the Committee to improve understanding and confidence of the PSU among staff and our representative bodies. We have independent external oversight in place covering pensions and operational assurance, and we will consider how this could be appropriately implemented for professional standards.

Engendering trust in the PSU is vital as we want to ensure our people have confidence in the unit and report poor behaviour in line with our policies and procedures. Building trust and confidence in the PSU was something that His Majesty’s Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) drew attention to in its 2024 inspection findings and you will be aware that this aligns with the [Independent Culture Review of London Fire Brigade (Culture Review).](https://www.london-fire.gov.uk/media/bkpdzmoz/independent-culture-review-of-lfb-report.pdf) The Culture Review recommended the implementation of an independent reporting line to investigate complaints by LFB staff. I can confirm this reporting line continues to be in place with the external service providing additional support to the PSU. This external service provider allows staff to report concerns via an external channel if that is their preference.

LFB appointed Martin Forde KC to the role of Chair of the Advisory Panel in 2023. Martin has responsibility for scrutinising progress on culture improvement across the organisation, and acts in an independent and external capacity to the Brigade. The Advisory Panel is now well established at LFB and the work of the PSU is a key element of the Panel’s ongoing scrutiny. Martin is nationally recognised for his experience in bringing independent scrutiny to organisations and, alongside the wider Panel, he continues to hold the Brigade to account on staff confidence in our HR processes. Martin has made his contact details known to staff members in order that they have access to him in support of transparency and continuous development and improvement of the PSU. I am pleased that the Fire Committee has invited Martin to a number of its meetings to ensure that our work on culture improvement is scrutinised at every level, as this in itself also helps to grow confidence amongst our staff.

Data from our most recent annual People Survey, which was responded to by 74% of staff, has indicated an improving level of confidence in LFB’s processes for managing complaints (see table below):

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| **Question** | **2023 Favourable Score**  **(strongly agree & agree)** | **2024 Favourable Score**  **(strongly agree & agree)** | **Comparison** | **Net change in unfavourable score from 2023** |
| The processes LFB has created to tackle unacceptable behaviour are appropriate | 35% | 40% | +5 | -2 |
| I am confident that if I raise a complaint it will be dealt with appropriately | 39% | 44% | +5 | -4 |
| I am treated fairly at work | 57% | 69% | +12 | -6 |
| Senior leaders are dealing with unacceptable behaviour in the workplace | 38% | 43% | +5 | - |

We will continue to issue surveys at regular intervals to ensure that the trajectory remains positive around confidence in our processes and to assess where continuous improvements can be made.

**Recommendation 2 - London Fire Brigade should monitor and report its performance against the Professional Standards Unit’s 10 key performance indicators (KPIs) publicly on a quarterly basis. Where conduct investigations are not concluded within twelve weeks of the respondent being notified that they are under investigation, an alert should be triggered and sent to London Fire Brigade’s independent advisory panel.**

The recent HMICFRS inspection [report](https://hmicfrs.justiceinspectorates.gov.uk/publications/frs-assessment-2023-25-london/#:~:text=We%20have%20measured%20the%20service%20against%2011%20areas,this%20site%20or%20by%20downloading%20the%20PDF%20file.) into LFB’s performance included an action to better communicate information relating to the PSU and its performance to staff. We recently appointed the first permanent Head of the PSU who is reviewing the current resourcing within the unit to ensure they can respond to ongoing reporting requests. We intend to publish our first comprehensive PSU KPI performance data by the end of the calendar year.

**Recommendation 3** - **The Professional Standards Unit should carry out review of cases it considers were escalated above their commensurate level of severity by October 2025. This should inform a new curriculum of procedural training and support for middle managers. In developing this curriculum, the Professional Standards Unit should consider innovative training modalities such as mentoring, real-time advice, and scenario-based training.**

LFB understands the rationale behind this recommendation and I would like to assure the Committee that cases are kept under continual review to ensure any learning is fed back into PSU processes and procedures. The objective process of determining whether a disciplinary or grievance penalty is stage 1, stage 2 or stage 3 *(stage 3 being the stage that is the highest and most severe stage and carries the potential possibility of dismissal)* is determined by the PSU (taking legal advice where necessary) in accordance with relevant policies and procedures which are recognised and agreed by representative bodies.

In addition to this, any employee subject to a grievance or disciplinary hearing has the right to appeal, in accordance with ACAS Disciplinary and Grievance procedures, as well as the LFB Disciplinary and Grievance procedure (commonly referred to as the ‘Grey Book’), with representative support, if they consider the penalty they have been given is not correct or there has been a procedural error. It is important that this process is relied upon and not interfered with, as to do so could lead to bias, claims of inconsistency or procedural challenge.

However, LFB agrees that it is important that, where possible, middle managers have the skills and confidence to deal with issues locally before they become serious enough to be escalated to the PSU.

Following, the appointment of a new Director for People in January 2025, we are adapting our HR structure to provide additional support to middle managers by increasing the HR support they can draw upon at a local level. This will mean that our middle managers will have access to dedicated teams in each of the four operational areas across LFB who will be sighted on people issues within those areas.

The historic lack of investment in leadership training across the Brigade was highlighted as an issue which is why since 2022 LFB has delivered the largest leadership programme in the organisation's history, including Leadership Academy Courses for 1600 leaders, Leading Culture Conversations for 1700 leaders and Inclusive Leadership Training for 130 leaders. Plans are in place for the full adoption of the National Fire Chiefs Council Middle Leaders Programme.  Building on this progress, the Director for People and the Head of the PSU are currently working with colleagues in Learning and Professional Development to implement a Brigade-wide competency framework that will include training on managing difficult conversations, sickness absence, capability and posing various workplace scenarios.

**Recommendation 4 - By the end of this Parliamentary term (2024-2029), the Government should**  **establish a College of Fire and Rescue and pass the necessary legislation to make firefighting a regulated profession. The College of Fire and Rescue should be tasked with developing and managing a national barred list that holds details of staff who**  **have been dismissed for gross misconduct.**

The Brigade supports the establishment of a College of Fire and Rescue and making firefighting a regulated profession. The Brigade and the fire and rescue service sector would benefit from a properly funded national College of Fire to provide education and set standards to a nationally mandated model. LFB continues to engage with government, NFCC and the Fire Brigades Union as well as the wider sector in the planning and delivery of a college.

**Recommendation 5 -To demonstrate increased trust and confidence, London Fire Brigade should raise its Key Performance Indicator for levels of staff who would recommend London Fire Brigade as a place to work to 65 per cent by January 2026 and 70 per cent by January 2027.**

We acknowledge and support the Committee’s challenge through this recommendation for LFB to continue to be ambitious in our expectations for improvement across the workforce. LFB reviews Key Performance Indicators on an annual basis to ensure they remain up to date and appropriately challenge the Brigade’s performance. The next review of the KPIs is due to begin later this year and we will review this target taking into consideration the Committee’s recommendation. Future reviews beyond 2026 will be conducted under the same principle of ensuring our KPIs remain up to date and appropriately challenge the Brigade’s performance.

**Recommendation 6 - As part of London Fire Brigade’s commitment to transparency and openness it should continue to survey its workforce at least annually, and publish the findings of the surveys.**

LFB currently has an annual survey in place, and has plans to supplement the findings of this with pulse surveys to maintain an understanding of staff experiences across the organisation. We are committed to maintaining this approach and we agree with the Committee’s view that this is essential in ensuring we continue to make meaningful progress in our workplace culture.

**Recommendation 7 - London Fire Brigade should introduce a new key performance indicator on waiting list times for those seeking mental health support services, and take active steps to reduce these waiting times.**

LFB supports the intent behind this recommendation and agrees with the importance of staff being able to access mental health services expediently. However, introducing a single metric would be challenging as LFB has a broad range of internal mental health services available to staff, including our Counselling and Trauma Service, Mental Health First Aiders, a Peer Trauma Support Team, and Post Incident Office and Staff Support. These services cater for staff across a wide range of levels of support that may be needed, from immediately after a traumatic incident, through to longer term support services.

Improvements have continued within our Counselling and Trauma Services to ensure that the service meets the needs of the staff. We continually monitor the waiting times to access the service. The latest figures from May 2025 reported waiting times for counselling at 8 working days.

In March 2025, a new Occupational Health provider (Optima) came into place. This, along with introducing an Employee Assistance Programme, has been a focus in health and wellbeing provision for the Brigade in early 2025.

This year we are improving our provision around mental health support for our staff with the addition of personnel trained in Emergency Services Trauma Intervention Programme (ESTIP). This will provide immediate peer support to crews exposed to traumatic events, which is evidence-based in promoting recovery. Mental Health First Aiders continue to provide localised support to staff to signpost to the various resources available to staff, ensuring that the most appropriate help is offered. Our target continues to be at least one mental health first aider on each station by the end of 2025.

Other developments in wellbeing include the procurement of an Employee Assistance Programme (EAP) which will offer staff additional support mechanisms, such as legal and financial advice, counselling for staff, their partners, and dependent children aged 16-24 and carers support. Furthermore, this year LFB has already started to develop our 'Green Exercise/Therapy' programmes which explore other evidence-based interventions, offering both preventative and responsive approaches to maintaining wellbeing, based on social prescribing.

Consideration will be given as to how we can build on the services that we have available and improve health outcomes holistically for our staff.

**Recommendation 8: London Fire Brigade should publish a new strategy for attracting and retaining more diverse candidates into the service, by the end of March 2026. It should address existing barriers in terms of outreach, recruitment channels and incentive structures for applicants.**

This recommendation aligns with the introduction of a Head of Resourcing post, which will

report to the Director for People Services. The role will develop the existing recruitment team to focus on workforce planning and outreach. A key part of this will be improving the effectiveness of our outreach into communities that are less represented within the workforce. Once in place, the Head of Resourcing will work with the Director of People to consider how this should be most effectively achieved, and we will update the Committee on this in due course.

We will also continue to keep under review our KPIs in relation to diversity, as previously suggested by the Committee, with the next review due in early 2026. As has been previously highlighted to the Committee, the changing demographic of the workforce is impacted by historic low levels of representation across the fire service nationally and the level of staff turnover within the Brigade, however, we remain committed to driving progress in this area to ensure our workforce composition better reflects the communities we serve.

**Recommendation 9: London Fire Brigade should carry out a review examining disproportionality in PSU cases covering its first 18 months of working January 2024-June 2025. This should include a thematic analysis of why cases are being raised by London Fire Brigade staff with protected characteristics, as well as the levels of disciplinaries handed down to these groups. London Fire Brigade should consult with the independent advisory panel as part of this review.**

LFB analysed historic disciplinary data in relation to protected characteristics prior to the Culture Review, which fed into the final findings of the report. Key to building trust and confidence in the PSU among all staff is ensuring that there is no disproportionality in our disciplinary and grievance processes.

A detailed analysis was undertaken in the first year of the PSU’s operations and found that there was no disproportionality in PSU disciplinary cases related to protected characteristics. In terms of grievances raised, the number of grievances raised by women was higher (28.6%) than the overall representation of women (18.7%) in the workforce and the number of grievances raised by staff with disabilities (17.1%) was higher than the overall representation of disabled staff (6.1%). The PSU is examining the nature of the grievances raised to consider if there are thematic concerns that need to be addressed. There were no identified disproportionalities in grievances raised for other protected characteristics. These findings were reported to LFB’s Culture Advisory Panel. Examining disproportionality remains an ongoing priority for the Brigade and the PSU keeps disciplinary data under continuous review.

**Recommendation 10: Fire Brigade should rollout bespoke bystander training aimed at the kinds of issues being identified within watches.**

LFB has undertaken a range of activity to improve staff understanding of their individual responsibilities when they witness poor behaviours. This was an important message of the rollout of the values launched in December 2023, which were co-created with staff to ensure they were relevant and meaningful for our workforce. The rollout included strategic briefings to all departments by senior leaders, a briefing for every individual team by their manager, values specific workshops attended by all staff, as well as visits by the Commissioner, Director or Senior Leaders to all 103 Fire Stations.

As detailed in the earlier response to Recommendation 3, LFB has also since 2022 delivered the largest leadership programme in LFB’s history. Separate training was also provided to all staff following the launch of the PSU in January 2024, which was mandatory for all managers, and provided clear direction on expectations around reporting poor behaviours.

While this represents important progress, we recognise the need to continue to push for improvements. Our Learning and Professional Development department keep our training provision under continual review and will undertake a gap analysis to consider how the Committee’s recommendation is already being covered through existing training and whether there are any further changes to training provision required to ensure that staff are fully aware of the expectations on them when they witness poor behaviours.

We are grateful to the Committee for providing us with this report, which provides an additional lever for driving further change across the organisation. We look forward to continuing to work with you to improve the workplace culture for all our staff. We will continue to keep the Committee updated on our progress.

Yours sincerely,

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**Jonathan Smith**

Deputy Commissioner