



**Hina Bokhari OBE AM**  
**Chair of the Fire Committee**

Sir Sadiq Khan  
Mayor of London

(Sent by email)

16 January 2025

Dear Sadiq,

At its meeting on 14 January 2025, the Fire Committee, considered the London Fire Commissioner's Reserves Strategy and Medium-Term Financial Strategy 2025/26.

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 Committee formally noted the Reserves Strategy and Medium-Term Financial Strategy 2025/26 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 notes the budget pressures arising from competing demands arising from new and ongoing priorities, including:*

- *Supporting the new building safety regime*
- *Meeting Net Zero targets*
- *Driving the changes and policies required for the culture change programme*
- *Implementing the Grenfell Tower Inquiry Phase 2 report recommendations.*

*The Committee calls on the Mayor to support LFB in seeking improved funding from the Government for the new demands placed on it.*

Please contact Diane Richards, Committee Officer, at [diane.richards@london.gov.uk](mailto:diane.richards@london.gov.uk) if you have any questions about this matter.

Yours,

A handwritten signature in black ink that reads "Hina Bokhari". The signature is written in a cursive style with a large 'H' and 'B'.

**Hina Bokhari OBE AM**  
**Chair of the Fire Committee**



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Sir Sadiq Khan  
Mayor of London

(Sent by email)

16 January 2025

Dear Sadiq,

At its meeting on 14 January 2025, the Fire Committee, considered the London Fire Commissioner's Statement of Assurance 2023/24.

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 Committee formally noted the Statement of Assurance 2023/24 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 document contains all the relevant information but seeks further assurance that the Brigade will remain committed to improving its culture by continuing its focus on community engagement through its Community Risk Management Plan (CRMP) and recruiting a more diverse workforce that better reflects the communities it serves.*

Please contact Diane Richards, Committee Officer, at [diane.richards@london.gov.uk](mailto:diane.richards@london.gov.uk) if you have any questions about this matter.

Yours,

A handwritten signature in black ink that reads "Hina Bokhari". The signature is written in a cursive style with a light blue rectangular background behind it.

**Hina Bokhari OBE AM**  
**Chair of the Fire Committee**

## LFC Budget 2025-26

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**Report to:**

Investment & Finance Board  
Commissioner's Board  
Fire Board  
London Fire Commissioner

**Date:**

27 February 2025  
12 March 2025  
01 April 2025

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**Report by:**

Assistant Director - Finance

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**Report classification:**

For decision

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**For publication**

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**Values met**

Service  
Integrity  
Teamwork  
Equity  
Courage  
Learning

I agree the recommended decision below.



**Andy Roe**

London Fire Commissioner

Date

**This decision was remotely  
signed on 31 March 2025**

# PART ONE

## Non-confidential facts and advice to the decision-maker

### Executive Summary

This report presents the London Fire Commissioner's (LFC) final revenue and capital budget for 2025-26 for approval. In the context of a challenging financial climate, a balanced budget proposal for 2025-26 has been achieved through a combination of significant savings and additional funding from the Mayor of London. This has enabled the LFC to protect frontline delivery and regulatory capabilities in 2025-26 to ensure that the London Fire Brigade (LFB) remains trusted to serve and protect London.

In common with many public sector organisations, major financial challenges and uncertainties remain beyond 2025-26. The Brigade will continue to work closely with partners to make a strong case for appropriate levels of sustained funding for the fire sector and the LFC in particular (recognising the unique challenges and risks in London) as part of the government's Spending Review.

### Recommended decisions

#### For the London Fire Commissioner

That the London Fire Commissioner approves:

1. The Budget Submission for 2025-26 to the Mayor that includes:
  - a. A draft Medium-Term Financial Strategy (MTFS) covering the period to 2027-28 at Appendix 1.
  - b. Savings of £28.2 million in 2025-26, as set out in appendix 2.
  - c. A total use of reserves of £16.5 million in 2025-26.
  - d. Departmental Investment proposals of £2.5 million in 2025-26 as set out in Appendix 3.
  - e. A draft 20-year Capital Strategy together with a detailed four-year capital plan at Appendix 6.

# 1 Introduction and background

- 1.1 This report updates the budget proposals included in the Budget Submission to the Mayor in November 2024 (LFC-24-108), which was based on a funding level of £511.5 million in 2025-26. It was noted that, despite identifying £28.2 million of savings, in order to balance the budget for 2025-26, either additional income or further savings of £18.0 million would be required. In the Mayor's Final Draft Consolidated Budget, which was considered at the meeting of the London Assembly on 25 February 2025, the Mayor allocated additional funding to the LFC to close this £18 million gap (as well as providing an additional £2.5 million to help deal with increased Employer National Insurance costs) – these are detailed further in section 3 of this report below. The LFC is grateful for this support from the Mayor, which enables the Brigade to protect frontline services and regulatory capabilities, whilst also continuing to improve.
- 1.2 LFB have a good track record of delivering improvements through investment. Since the tragic fire at Grenfell Tower in 2017, LFB have made significant changes, including:
- completing all 29 recommendations from the Grenfell Tower Inquiry (GTI) Phase 1 report
  - introducing new training, kit and equipment
  - improving in 10 out of the 11 areas in His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) Round 3 inspection
  - implementing improvements in support of culture change to modernise the service for the 21<sup>st</sup> century.
- 1.3 The report updates the Medium-Term Forecast and savings and growth proposals as the estimates included in these have been refined as part of concluding the budget process. As with the wider public sector, funding from 2026-27 remains challenging and uncertain and is subject to the outcomes of the government's Spending Review which is currently underway (expected to conclude in June 2025). There are several financial challenges facing the LFB, many of which are reflected across fire services nationally. This is set against the context of a real term reduction in the annual funding to the LFB in excess of £150 million when compared against funding in 2010 uplifted for inflation. This is despite the current Mayor providing support over and above central government funding. Against our global comparators the LFB is a significantly smaller organisation compared to equivalent services in major cities such as New York, Paris, Tokyo and Hong Kong.<sup>1</sup>
- 1.4 The Capital Programme and Capital Strategy for the LFC have also been reviewed and updated proposals set out in this report.

## 2 The Mayor's Final Draft Consolidated Budget

- 2.1 The Mayor's Final Draft budget was published on 17 February 2025 and subsequently approved without amendment by the London Assembly on 25 February 2025.
- 2.2 The Mayor is proposing to increase the fire element of their Council Tax precept by £4.98 in 2025-26 to £71.72 (Band D) – equivalent to the monetary impact of a 2.99 per cent increase on the 2024-25 non police-precept – which is below the maximum 3 per cent allowed before a referendum is required under the draft council tax referendum principles for 2025-26 for equivalent fire and rescue authorities in England.
- 2.3 The Mayor has also reviewed assumptions regarding business rates income and increased forecast levels in 2025-26. This also includes the funding provided to the LFC.

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<sup>1</sup> London has less than 5,000 operational firefighters compared to 11,000 in New York and 8,600 in Paris. Tokyo and Hong Kong have over 18,000 and 10,000 operational staff respectively; this includes Emergency Medical Staff but the bulk of the workforce are firefighters.

### 3 Budget Development Process

- 3.1 The Mayor's Budget Guidance for 2025-26 for the Greater London Authority (GLA) and the functional bodies was issued on 31 July 2024. The Guidance sets out the Mayor's key policy priorities to be reflected in future years' budgets, the proposed funding levels he intends to provide for each functional body, the financial context and the planned timetable for budget preparation for the GLA Group.
- 3.2 In his Budget Guidance the Mayor has used indicative funding levels from retained business rates, council tax precept income and Group wide reserves to determine the total funding he plans to provide to each functional body, including the LFC, from the resources under his control.
- 3.3 The Mayor then set out funding totals for each functional body, which are all based on a prudent, but not worst-case, assessment of council tax and business rates income. This assessment assumed a 2 per cent increase in business rates in line with inflation, a 2 per cent increase in council tax precept and an increase in the council tax base of 1 per cent in 2025-26.
- 3.4 This year's budget process has seen a continued emphasis on ensuring the budget supports the key strategic priorities for the LFC, based on the CRMP. This includes the eight commitments (which are underpinned by Business-As-Usual activities, continuous improvement and programmes) as follows:
- work with you to provide localised services that meet your needs
  - make it easy for you to access our services
  - adapt our services as your needs change
  - design services around your needs and concerns
  - enable our people to be the best they can be, to serve you better (incorporating work relating to the Independent Culture Review)
  - work together to provide the best possible services to meet your needs
  - driven by evidence to give you the value you expect
  - work with other organisations to secure a safer future for everyone.
- 3.5 The Mayor published his Consultation Budget and Draft Capital Spending Plan for 2025-26 for consultation on 4 December 2024. This consultation closed on Wednesday 3 January 2025. The Mayor proposed to provide funding of £511.5 million for the London Fire Commissioner in that year, in line with the amount included in the LFC's Budget Submission to the Mayor.
- 3.6 Following the Mayor's consultation on his draft budget he published his Draft Consolidated Budget on the 15 January 2025. That report uplifted the funding available to the LFC by £5.3 million, to reflect the increased council tax flexibility available to the GLA following the Local Government Finance Settlement.
- 3.7 The Mayor then published his Final Draft Consolidated Budget 2025-26 on 17 February 2025 which included further increases to LFC funding allocations of £19.6 million from 2025-26 onwards, for a total increase in funding of £24.9 million from the proposed funding level as set out in the Mayor's Budget Guidance. This increase meets the £18.0 million funding requirement as set out in the LFC's Budget Submission as well as a £6.9 million pressure to employer's NI contributions (of which £4.4 million was provided by the government through the Local Government Settlement). This position is summarised in the below table.



Table 1: Funding Proposed by the Mayor

	2025-26 £m	2026-27 £m	2027-28 £m
<b>LFC's Budget Submission to the Mayor / Mayor's Consultation Letter to the LFC</b>	<b>511.5</b>	<b>530.6</b>	<b>549.3</b>
<b>Mayor's Final Consolidated Budget</b>			
Additional Business Rates	9.5	9.6	9.6
Additional Council Tax precept	11.0	11.1	11.2
Local Authority Settlement	4.4	4.4	4.4
<b>Total Revised GLA Funding</b>	<b>536.4</b>	<b>555.7</b>	<b>574.5</b>
Increase in GLA Funding Level	24.9	24.8	24.9

## 4 Budget Process 2025-26 Core Themes

- 4.1 The 2025-26 budget process was developed under three core themes that have continued from the prior year process, these being; Business as Usual (including continuous improvement), CRMP Delivery and Efficiencies and Savings. These were considered alongside central assumptions around inflationary pressures and financial risks.
- 4.2 Each Transformation programme submitted budget bids based on known and anticipated funding requirements for the next phase of transformation. These bids, as far as possible, included any additional funding requirements of departments supporting delivery of that change.
- 4.3 Departments were also asked to submit investment bids for improving core / business as usual services and focusing on opportunities for efficiencies and productivity improvements.
- 4.4 Throughout the early stages of this process, it was evident that in order to maintain and build upon the performance over the last few years and in the context of significant financial challenges including pay, overtime and inflation (as outlined in the Budget Submission to the Mayor in November 2024), it would be challenging to deliver a balanced budget for 2025-6 and future years. The cost of transformation had been met through a combination of core budgets and use of reserves (including the Budget Flexibility Reserve) to the cost of around £50 million. The Budget Flexibility Reserve is forecast to be exhausted by the end of 2024-25 and the Brigade faced difficult choices in prioritising resources.
- 4.5 As at the end of August 2024, with all proposals consolidated the overall budget gap was £46 million (after factoring in savings of £10 million that were set out in the 2024-25 budget process and within the 2025-26 process).
- 4.6 Alongside the budget and financial planning work, we established an in-depth Financial Review, jointly led by a newly appointed LFB Assistant Director and an external expert. They looked with fresh eyes and an outside-in perspective across the Brigade at how we operate and worked with Directors and Heads of Service to identify additional efficiencies so that LFB can continue to maximise investment in its frontline. As it continues to be implemented, the review will not result in any reduction in operational frontline delivery or regulatory capabilities to ensure we remain trusted to serve and protect London.
- 4.7 Through tough choices on priorities, and de-scoping, delaying or stopping certain areas of activity, this resulted in significantly reduced growth bids, thereby reducing the budget gap by £10.2 million.
- 4.8 The next stage focused on efficiencies and savings. Whilst there were already significant departmental savings targets of £10.0 million, further savings were identified to reduce the budget gap. These additional savings amount to £18.0 million and therefore the overall savings target for 2025-26 totals £28.2 million as set out below. The LFB worked hard to reduce the impact on individuals and teams and

balance LFB's budget as far as possible by improving efficiency and reducing unnecessary spend. Nevertheless, it became clear that it would not be possible to balance the budget without considering changes to the way Fire and Rescue Staffing (non-operational) teams are organised and, in some cases, reducing the number of posts and people.

Table 2: Total 2025-26 Savings

<b>Savings</b>	<b>2025-26 £'000</b>	<b>Comments</b>
Existing Departmental Savings (from prior year's budget process)	5,483	These are savings put forward by departments in the previous year's budget planning round that come into effect from 2025-26.
New Departmental Savings (initial 2025-26 budget process)	4,476	These are new savings put forward by departments as part of this year's budget planning round.
<b>Total Departmental Savings</b>	<b>9,959</b>	<b>This is the initial total level of savings put forward by departments as part of the usual planning round.</b>  <b>The rows below are the additional savings following an in-depth financial review, consideration of programmes by the Performance, Risk and Assurance Board (PRAB) and prioritisation by Directors and Commissioner.</b>
Additional Departmental Savings 2025-26	5,645	These are additional savings put forward by directors, mostly staff-related but also include some non-staff savings. Savings in FRS staff costs, which are subject to consultation, are included here, although there may be some further staff impacts depending on outcomes of the 'Process efficiencies' and 'Data management' workstreams noted below. Taking the latter into account, we currently estimate the full year impact of all proposed FRS staff reductions to be around £6 million of savings, with the impact in 2025-26 to be around £4 million due to timings of when savings will be realised.
Financial Review / Cross Cutting	9,630	This is made up of savings through: - Vacancy Control Panel (£3 million); - Reduction in operational overtime through measures including lower sickness levels (£3 million); - Contracts Review (£2 million); - Process efficiencies (£1 million); and - Data management review (£0.6 million).
Reduction in Training Inflation	1,100	This relates to target reduction in costs.
Net Reduction against previous assumptions in CRMP Programmes	1,856	This follows assessment and prioritisation through the Performance, Risk and Assurance Board of programme budgets in 2025-26.
<b>Total Budget Review Proposals</b>	<b>18,231</b>	
<b>Total (Departmental + Budget Review Proposals)</b>	<b>28,191</b>	

- 4.9 This however still left a residual budget gap of £18.0 million, which formed the basis of the consultation budget submitted on the 22 November 2024 with further savings still to be identified or additional income to be sought. Recognising that the Brigade had gone as far as it could, and that further savings would have to come from the frontline, this residual gap was subsequently closed by the Mayor in his Final Consolidated Budget.

## 5 Budget Update

- 5.1 The financial pressures and reductions within the LFC's Medium Term Financial Planning (MTFP), investment and savings have been kept under review and the table below sets out the additional changes that have been identified following the publication of the LFC's budget submission to the Mayor on 22 November 2024.
- 5.2 Table 3 below sets up a summary of these movements, with additional information on pressures after the table. This sets out an overall balanced budget for 2025-26.
- 5.3 The increased income largely reflects additional funding from the Mayor to meet the budget requirement (£18.0 million) as well as funding for the increase in Employer National Insurance (£6.9 million, of which £2.5 million is from the Mayor). The other income/savings include the impact of higher than anticipated investment income, rental income and reduced capital financing costs.
- 5.4 The largest unfunded impact on the financial position relates to the shortfall in Pensions Grant Funding. This issue has arisen following the 2020 Firefighter Pension Actuarial Valuation, the results of which was published in December 2023. That report set out a significant increase in employer pension contributions for all Fire & Rescue Authorities (FRAs) from 2024-25, related to factors that were outside of the control of FRAs.
- 5.5 Although initial allocations for the Pensions Grant to the LFC were lower than estimated costs by around £3 million in 2024-25, it had been expected that this would be corrected both in 2024-25 and future years. This assumption was based on communication from central government that sufficient funding was available nationally to meet the additional costs across the fire sector, which subsequently turned out not to be the case.
- 5.6 The calculation has been since been reviewed by central government to incorporate updated data for 2025-26, and although that has reduced the Pensions Grant shortfall, there still remains a gap of £2 million between additional costs identified and grant received from 2025-26. The LFC will continue to make the case that this funding should be provided in full both for 2025-26 but also as part of work in preparing for the Spending Review so that there is no ongoing deficit.
- 5.7 Table 3 below also sets out the expected budget deficit from 2026-27 of £18.0 million, before reducing to £16.7 million in 2027-28. The future year deficits largely relate to investment in operational training that have been funded through the Fire Safety Improvement Reserve in 2024-25 and 2025-26. As this is not a sustainable source of funding, additional funding will be required from 2026-27 to ensure we maintain and improve our operational training capability. The LFC is working with GLA and partners in the fire sector to make the case for this funding with government as part of the Spending Review.

Table 3: Updates to MTFP since 22 November 2024 submission

	2025-26 (£m)	2026-27 (£m)	2027-28 (£m)
National Insurance	6.9	6.9	6.9
Pensions Grant Shortfall	2.0	2.0	2.0
NILO Training Courses	0.8	0.8	0.8
Research Capability	0.5	0.5	0.5
Contaminants	0.1	0.1	0.1
Reduction in Grant Funding	0.4	0.4	0.4
Mobilising System	0.0	0.8	1.2
Rental Income and Water Rates	0.2	0.2	0.2
Transfer to General Reserve	2.9	2.0	0.7
<b>Total Pressures</b>	<b>13.8</b>	<b>13.7</b>	<b>12.8</b>
Funding (Government): National Insurance	(4.4)	(4.4)	(4.4)
Funding (Mayor): National Insurance	(2.5)	(2.5)	(2.5)
Funding (Mayor): To meet Budget Gap	(18.0)	(18.0)	(18.0)
Investment Income Assumptions	(0.5)	(0.5)	(0.5)
Rental Income	(0.4)	(0.4)	(0.4)
Capital Financing	(3.6)	0.8	2.6
MFB Act Income / Additional MTFS Pressures	(2.0)	(2.0)	(2.0)
Airwave (Annual Contract fee)	(0.4)	(0.4)	(0.4)
<b>Total Reductions</b>	<b>(31.8)</b>	<b>(27.4)</b>	<b>(25.6)</b>
22 November 2024 Budget Requirement	18.0	31.7	29.5
<b>Revised Overall Budget Position</b>	<b>0.0</b>	<b>18.0</b>	<b>16.7</b>

Information provided in the following paragraphs give more detailed information on the additional pressures and reductions.

#### National Insurance

- 5.8 The increase in employer's national insurance contributions has resulted in a £6.9 million pressure. This has been fully met through a combination of the local government settlement (£4.4 million) and additional funding from the Mayor (£2.5 million).

#### Pensions Grant Shortfall

- 5.9 The increase in employer's firefighter pension contributions has resulted in a £18.0 million pressure. This has been partially met through additional grant funding of £16.0 million in 2025-26, resulting in a £2.0 million pressure.

#### National Inter-Agency Liaison Officer Training Courses

- 5.10 This pressure includes £314k which was inadvertently removed as part of the budget process and still required, in addition to a further £437k that has been identified following additional

review. The overall costs of NILO courses are cost-neutral as LFB recovers costs through charges (the income had already been included in the Budget submission in November 2024).

#### Provision of Research Capability

- 5.11 This pressure reflects the movement of CRMP programme funding to Business-As-Usual activities in order to enable the translation of LFB's Annual Assessment of Risk and Organisational Learning into operational policy, capability and safe systems of work. The CRMP programme reduction was previously factored in but not the transfer to BAU.

#### Contaminants

- 5.12 The pressure reflects that a one-off growth bid agreed for 2024-25 is now required on an ongoing basis.

#### Reduction in Grant Funding

- 5.13 This largely reflects the removal of the Fire Link Grant from 2025-26 as well as the removal of a new risks grant.

#### New mobilising system

- 5.14 This reflects the increased costs of the new mobilising system compared to the previous version, following the recent completion of the tender award.

#### Water Rates / Union Street Rental Income

- 5.15 There has been an increase in water rates of almost a third. In addition, there has also been a recent notice for a tenant to vacate Union Street which impacts to the overall tenant income received. There is an offsetting increase in rental income of £0.4m.

#### Transfer to General Reserves

- 5.16 These reflect top-ups to the General Reserve to help ensure that this Reserve is maintained at 3.5 per cent of mayoral funding over the medium term in line with the reserves policy (albeit in the short-term this falls below the 3.5 per cent limit).

#### Investment income assumptions

- 5.17 This increase follows a review of the latest forecasts for investment balances and returns.

#### Capital financing

- 5.18 Capital financing costs have been reviewed in light of actual costs incurred to date in 2024-25 and latest forecasts for 2025-26.

#### Review of Metropolitan Fire Brigade (MFB) Act Income Additional MTFS pressures

- 5.19 Due to the current year uplift in income, this has resulted in an improved base starting position that can also be factored into future years. This also includes the impact of a review of medium-term forecasts to reflect an updated staff pay position.

#### Airwave annual contract fee

- 5.20 This reflects a notification from the Home Office in March 2025 of a reduction in the Airwave contract fee charged to Fire & Rescue Authorities, following the Competition and Markets Authority's decision to impose a charge control mechanism on the supplier.

#### **Results Based on Prior Investment**

- 5.21 Over recent years the Brigade has been subject to important external reports, which called for change across the whole organisation.
- 5.22 The Phase One report of the Grenfell Tower Inquiry made a total of 29 recommendations, which the LFC accepted and set out at pace to deliver. By March 2024 all 29 of the recommendations had been delivered.

- 5.23 In December 2022, HMICFRS placed the Brigade in "Engage" due to the scale of improvements that were required to be made regarding culture, as evidenced by their own assessments and the findings of the Independent Culture Review that was initiated by the Commissioner. All fire and rescue services are in routine monitoring under a "scan" process by default, but this may be escalated to the "engage" level, which entails enhanced monitoring if the concerns of the inspectorate are not being adequately addressed. HMICFRS continued to "engage" with LFB and in March 2024 we were moved out of the enhanced monitoring with the inspectorate noting the following:
- clear involvement of staff in developing values, with significant work to communicate values to staff
  - most staff that HMICFRS spoke to felt senior leaders displayed brigade values
  - clear commitment to improve leadership skills among managers through an ongoing programme of leadership training
  - clear progress in the Brigade's ongoing plan to improve its human resources function
  - improved processes to deal with behaviours such as bullying and discrimination, including establishing a Professional Standards Unit
  - a comprehensive plan in place to improve vetting of Brigade staff; and
  - assurance in the sustainability of the Brigade's plans to change its culture.
- 5.24 All the improvements that could be seen by HMICFRS and with the addition of addressing all 23 of the recommendations of the Independent Culture Review, would not have been made possible without strong senior leadership and financial investment to remedy historic issues.
- 5.25 In summer 2024 the HMICFRS undertook its latest (Round 3) full inspection of LFB. The inspection was wide-ranging and included strategic interviews, focus groups and visits to fire stations and control to consider:
- the service LFB provide to the people of London and the way we use our resources
  - how effectively and efficiently LFB protect the public
  - how LFB respond to fire and other emergencies.
- 5.26 The inspectors also looked at how we spend our time at work, our experiences while at work, and how well we look after our people. The Inspectorate's report, which was published in November 2024, stated that they found significant improvements in our performance since our last inspection in 2022. The report highlights that London Fire Brigade has improved across ten of the eleven measures used in the inspection, including moving to 'Good' for Making best use of resources and 'Outstanding' for Responding to major and multi-agency incidents.
- 5.27 The Grenfell Tower Inquiry Phase 2 report made further recommendations. The LFB section of the report contains thirteen recommendations; one of which is specifically for the Brigade, five are for all Fire and Rescue Services, and the remaining seven are for HM Government, HMICFRS, the National Fire Chiefs Council and the British Standards Institution. We accepted all the recommendations aimed at the Brigade and Fire and Rescue Services and support the remaining recommendations. Our response set out LFB's position in detail. The response also made clear that we will develop a position on the wider recommendations which, although not aimed at LFB, are relevant to our communities and include wider building and fire safety issues.
- 5.28 The recommendation directly aimed at LFB, implementing change, is focused on creating robust systems to gather, review and implement lessons from previous incidents, inquests and investigations. Our response is clear that the Brigade has fully accepted this recommendation, committing to being a listening and learning organisation to ensure lessons from incidents are learned and good practice is shared across the organisation and with key agencies.

### **Staff Pay**

- 5.29 National and local negotiations around pay, including through the National Joint Council (NJC) for operational staff, will be key determinants of the pay award. LFB has a standard planning assumption of 2 per cent for pay at the start of the budget process. This assumption has been applied across all three years of the MTFS and therefore any increase or decrease on this position would see a corresponding risk or opportunity in the overall context of the budget position. Each one per cent change in pay is equivalent to around £4 million in cost for all staff groups.
- 5.30 LFB commenced skills payments in 2024-25 for operational staff who possess specific skills that enable them to undertake specialist roles within the Brigade. This will address a long-standing failure to incentivise and appropriately reward those undertaking specialist roles with additional skills and training requirements, which are crucial to London's operational response. Under the current budget proposals, skills payments are assumed to continue.
- 5.31 A diagnostic review of FRS, Control and TMG pay and reward has been undertaken. The review identified that in overall terms pay and benefits in the LFB are market comparable, although there are some exceptions with pay for specialist roles due to external market demands. However, there are issues with overlapping grades for some roles and the LFB has the opportunity to align and promote benefits more effectively. The recommendations and actions from this review will be considered in due course, once the LFB has taken the actions needed to deliver the 2025-26 savings.

### **Funding against the Assessment of Risk 2024**

- 5.32 The LFC has recently published its updated Assessment of Risk in London 2024. It reflects significant shifts in the risk profile across London, particularly in relation to geopolitical tensions and terrorism, poor health and health inequalities, adoption of new fuels and climate change.
- 5.33 In addition to providing a world class emergency response capability, our investment needs to fund an integrated, holistic approach to risk reduction. Our work to engage the public is vital if we are to secure and maintain their trust; without it, we are unable to educate and effect behavioural change. Our campaigning to improve regulation of the built environment and to highlight the risks associated with lithium-ion batteries is vital to informing public policy and has helped shape legislation during the current Parliament. Following the King's Speech in July 2024, the government announced the introduction of the Product Safety and Metrology Bill. The Bill will strengthen product regulation (including for e-bikes), address modern day safety issues and increase product safety from online marketplaces. The government publication that supported the King's Speech included statistics provided by LFB as key facts supporting the need for the Bill.
- 5.34 National research to quantify the impact of our work is maturing. Whilst it is challenging to evidence a direct relationship between our prevention activity and reductions in incidents, we are working on approaches to demonstrate the value and impact of our work, not just on the communities we serve, but also on the workload of our partner agencies.
- 5.35 Work to adjust plans in the light of the latest Assessment of Risk 2024 is underway and, in future years, we aim to demonstrate a clearer link between our investment proposals and their impact on risk.

### **Modern Firefighting & Training**

- 5.36 As part of last year's budget report, the LFC made a commitment to improve standards of Firefighter training to ensure it was at a level at which all Firefighters are well prepared for any potential incidents.
- 5.37 Specifically in response to the Grenfell Tower Fire, Manchester Arena Attack, numerous terrorist attacks in London, wildfire/climate change challenges and new and emerging technologies creating additional complexity, the need for this significant investment was critical for LFB over the short-, medium-, and longer-term risks.

- 5.38 To invest at pace, the LFC agreed to fund the investment in Modern Firefighting & Training from the Fire Safety Improvement Reserve for the first two years of its inception. Together with investment in associated investment in the Learning And Professional Development department (for example in relation to Firefighter Development), this amounted to £20 million in total across the financial years 2024-25 and 2025-26 respectively. However, this source of funding is not sustainable in the long term and therefore a resolution on longer-term funding still needs to be found.

### **Spending Review**

- 5.39 As the UK's largest fire and rescue service, LFB is working closely with the GLA and National Fire Chiefs' Council (NFCC) to make the case for sustained funding as part of the government's Spending Review which is underway (and which is expected to conclude in June). LFB is an essential frontline service in saving lives and protecting property, receiving yearly on average, more than 200,000 calls (around a quarter of all calls to all fire services nationally) and tackling 16,000 fires. As well as making the case for core funding requirements to ensure we can continue to serve and protect London, we are also highlighting the fire sector and LFB's contribution to the government's priorities around housing and economic growth.
- 5.40 LFB protects and serves a diverse population of nine million London residents, including more than a million people with disabilities, and more than twenty million visitors every year. A properly funded fire service is a critical enabler of London's growth agenda. LFB already operates in a challenging global city landscape not comparable to anywhere else in the UK, which continues to evolve. This includes an extremely dense and complex built environment. LFB has a central role in delivering the Mayor and the UK Government's commitment to drive growth in the capital. Previous UK Government estimates assert that fire has an annual cost to the UK of over £10 billion per year<sup>2</sup>. In London, an economic and business hub and major global tourist city, this risk is at its most acute.
- 5.41 The UK Government has an ambitious target to deliver 1.5 million new homes over the current Parliament, which will be crucial to the growth agenda. London will have a significant role to play in this and LFB has a core role in ensuring the safer delivery of new homes. This includes supporting the Building Safety Regulator, set up in response to the learning of the Grenfell Tower tragedy, to ensure higher risk buildings meet the highest safety standards.
- 5.42 London holds approximately 70 per cent of the UK's high-rise buildings and four times the UK national average for high-rise homes. There are more than 1,200 high and mid-rise buildings with interim measures in place owing to extreme safety concerns (for example, those around cladding). The experience of recent years has also demonstrated the substantial cost of rectifying failures of oversight in the built environment. As the fire and rescue service for the highest risk and highest wealth generating city in the UK, LFB has a critical role to play in avoiding future costs that hamper growth, including the substantial social impact on London's communities from living in unsafe buildings.
- 5.43 LFB has invested heavily in modernising its training offer to firefighters in recent years in response to the recommendations of the Grenfell Tower Inquiry (GTI) and His Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS), but also the changing risk environment in London. This has resulted in significant changes to operational response, apparent in both LFB's response to high rise fires such as New Providence Wharf and the Spectrum Building in Dagenham, but also in its capability to respond to Marauding Terrorist Attack. Operational staff at LFB now take part in regular small- and large-scale exercising, and training interventions in real fire environments that have introduced new skills, equipment, and tactics.
- 5.44 In order to sustain this change, it is critical that this level of training investment is maintained: to ensure improvements are maintained, but also to prepare crews for the evolving risk profile in

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<sup>2</sup> [Economic and social cost of fire - GOV.UK](#)



London. This includes building on core skills to allow staff to train in live fire environments that replicate the scale and complexity of London incidents; introducing flexibility to training programmes to enable them to confront emerging risk such as wildfires and the growing threat of climate change, or the challenges posed by battery technology. Against an increasingly unstable international backdrop there is also a need to continue to develop a robust, resilient workforce that is trained to manage large scale pan-London incidents where support from partners such as the armed forces may not be possible due to engagements elsewhere.

5.45 In summary, a strategic, long-term investment strategy for LFB that reflects the London context is essential to ensure LFB is resourced to support economic growth and keep Londoners safe. The London Fire Commissioner's specific asks of UK Government over the CSR period are:

- baselining funding for specific areas (including Protection, New Dimensions, and Pensions Grants), moving away from uncertain annual grant determinations. Uprating with inflation will ensure LFB is able to plan better for the medium- to long-term
- direct capital funding in recognition of the LFB's need to sustainably replace fire engines and other equipment, and keep fire stations in good condition, including the costs of achieving net zero. This will replace the need for borrowing (which there is insufficient revenue funding to afford), enabling sustainable investment in equipment and infrastructure to support vital operations and UK Government's ambitions for decarbonisation
- ring-fenced revenue funding for post-GTI improvements, particularly around operational training. LFB is currently using £20 million of its own reserves to kick start this, however it will be fully utilised by the end of 25-26 and need a sustainable funding source from 26-27
- recognition from UK Government that funding decisions must take account of realistic pay settlements
- ensuring that the increased employer costs of firefighter pensions arising from revaluations by the Government Actuaries Department are covered in full.

### **CRMP Programmes**

5.46 Within CRMP there are 9 distinct programmes of work, associated with the commitments set out in section 3.4. The changes in investments to programmes are set out in Appendix 4. The de-scoping, pausing and removal of budget requirements under the CRMP programmes for 2025-26 is not a decision made lightly and is only made in the context of the current financial constraints. Investment will be required in this area in future years to successfully embed long term operational improvements and cultural change whilst recognising longer term benefits to not only the organisation, but ultimately the community LFB serves.

### **Departmental Investment**

5.47 As part of the current year's budget process there were a significant number of investments put forward. As part of the director scrutiny process and ongoing work, elements of this have been re-phased, amended or paused completely on the grounds of financial constraints and to focus our resources and address the challenge of delivering a balanced budget. See Appendix 3 for investments that are supported for 2025-26.

### **Establishment**

5.48 The 2024-25 budget process proposed a forecast Average Vacancy Margin (AVM) of 100 operational posts below full establishment, with this level of AVM remaining constant in 2025-26.

5.49 Since the approval of the 2024-25 budget, work has continued on the feasibility and impact of the AVM on operational delivery. A working group reporting into the Establishment Board has been considering key aspects of the AVM. The conclusion from this work is a continuation of an AVM of 100 is a realistic assumption (rather than a goal) into the medium-term due to actual recruitment rates, staff turnover and the fact that firefighters only need to give one weeks' notice. Set at this level, the AVM balances the need to minimise unnecessary staff turnover against a realistic budget assumption that makes optimum use of LFB's limited resources.

5.50 Currently, operational workforce planning is carried out every month and discussed at Establishment Board. This approach will be further developed as a new organisational workforce planning strategy is put into place.

### **Savings, efficiencies and productivity**

- 5.51 As noted in sections 1 and 3 a total of £28.2 million (existing and new proposals) in Budget reductions are proposed for 2025-26.
- 5.52 To achieve these savings, LFB have worked hard to reduce the impact on individuals and teams, and tackle this as far as possible by improving efficiency and reducing unnecessary spend. However, LFB cannot balance the budget without considering changes to the way FRS teams are organised and, in some cases, reducing the number of posts and people. LFB have entered into a period of consultation with staff on these proposals.
- 5.53 Appendix 2 sets out how the savings will be delivered by directorate. The savings comprise: savings within directorates (including staffing savings), savings within the portfolio and cross-cutting savings.
- 5.54 The portfolio funding envelope has been set at £12.5 million for the year, focused on the CRMP priorities. Some programmes have been paused, though some of the work will now be delivered by business-as-usual teams.
- 5.55 The cross-cutting savings include a target for contracts due to be renewed in the coming year, slowing down recruitment of FRS staff, reductions in pre-arranged overtime through better absence management, a target for process efficiencies and a review of data analysis teams to reorganise that work.
- 5.56 Additional light-touch governance has been introduced by the finance team to ensure that progress against these savings targets is monitored. This includes fortnightly discussions with all directors, which are chaired by the Chief Finance Officer, as well as a monthly stock take with the Commissioner. Progress on efficiencies will be reported to the Investment and Finance Board.

### **Wider efficiencies and productivity**

- 5.57 We continue to strengthen our processes around, for example, business cases and portfolio management which is improving our resource allocations and delivery of value for money. LFB's Investment and Finance Board is playing an important role in scrutinising new expenditure proposals and reviewing existing expenditure through a rolling programme of 'deep dive' reviews.
- 5.58 LFB must submit an annual return to the National Fire Chiefs Council (NFCC) on its efficiency and productivity plan, with key targets of 2 per cent of non-pay efficiencies and increase productivity by 3 per cent by 2024-25. Across 2022-23 to 2024-25 the LFB submission included an average of 6.9 per cent of non-pay efficiencies which is well above the target set. The latest version of the Productivity and Efficiency Plan was included as part of the Budget 2024-25. The next iteration of the Productivity and Efficiency Plan is required by the Home Office to be updated by the end of April 2025.
- 5.59 Staff productivity is challenging to measure accurately or consistently across services. Nevertheless, LFB are continually looking to improve productivity. For example, firefighters now carry out targeted and specific visits to triage lower risk premises to enable Inspecting Officers to focus on higher risk premises and increases our reach into the business community. Changes to the way LFB respond to Automatic Fire Alarms (AFAs) also allow LFB to spend more time on protection work, such as fire safety checks in homes and businesses, as well as operational training. It also reduces the risk to the public through fewer 'blue light' emergency responses. More broadly, the new set of KPIs linked to the CRMP that LFB have published will enable LFB to better understand and improve productivity across a range of disciplines.

### **People and Culture**

- 5.60 LFB continues to drive an ambitious agenda around people and culture, which is vital to achieve the further improvements LFB has committed to following the Grenfell Tower Inquiry Phase 2 and

HMICFRS Round 3 inspection. The HR function is integral to delivery of the CRMP, which includes a focus on services being delivered by the right people with the right skills and capability.

- 5.61 Following recommendations from both the independent Culture Review, and the independent Review of People Services, the structure of the People Directorate was revised to better reflect the requirements of a more modern HR function.
- 5.62 The Professional Standards Unit (PSU) was established in January 2024, providing a centre of expertise under the Director for People, dedicated to ensuring fair and robust standards including managing bullying and harassment claims, discipline and grievance issues.
- 5.63 The department supported the culture change programme and the HR improvement agenda, including through:
- delivery of leadership development programmes for all staff
  - delivery of LFB Values workshops
  - delivery of coach and mentor training
  - development of HR data dashboards
  - review of flexible working, with a focus on removing barriers to progression for operational staff with parental / caring responsibilities
  - completion of the historic case review.
- 5.64 The new permanent Director for People took up post in January 2025. As a priority, the Director reviewed People Services in the light of current and future challenges and is currently consulting on organisational change to improve further the directorate's efficiency and effectiveness within the tight parameters of the 2025-26 Budget. In particular, the Director for People has articulated an ambitious vision for a service that includes:
- setting and providing assurance on high standards for itself and LFB's people, built around the Values
  - delivering consistently on its objectives
  - equipping LFB with the workforce it needs to meet the ambitious objectives set out in the CRMP by 2029
  - addressing the HMICFRS Round 3 Areas for Improvement relating to people and setting our own aspirational agenda for LFB across the next five years
  - achieving LFB's DEI objectives in relation to people, including our staff composition commitments.

### Grants

- 5.65 The Budget for 2025-26 includes anticipated grant income of £25.5 million, including a range of grants. Additional detail on the grants is set out in Table 4 below.

Table 4: Key Grant Receipts Projected

Grant Name	Amount in 2025-26 £m	Expected length of Grant
Pension Grant (2015 Firefighter Pension Actuarial Review)	16.1	Ongoing (Agreed annually)
Property PFI	3.7	Until 2039/40
New Dimensions	3.4	Ongoing (Agreed annually)
Merton Regional Control Centre	1.9	Until 2034/35
Other Grants	0.5	
<b>Total</b>	<b>25.5</b>	

- 5.66 As highlighted in the table, some grants will be agreed annually as part of the central government settlement process, and one is under review. The current MTFS assumption is that the total of £25.5 million will continue over the MTFS period but there is a risk this may not be the case.

### **Sustainability and Net-Zero Carbon**

- 5.67 The budget submission has been reviewed for sustainability and environmental implications. The LFC will continue to monitor performance through the ISO 14001-certified Environmental Management System that covers the functions of the LFB and published Sustainable Development Annual Reports. The LFC's budget includes allocations that will support most of the LFC's commitments under the London Environment Strategy. This includes implementing responsible procurement, reducing waste, improving air quality, increasing London's green cover, adapting to climate change, and reducing CO2 emissions in line with the Mayor's ambition to accelerate carbon reductions to achieve net zero by 2030 as part of COVID-19 recovery plans. More detailed information can be found within appendix 11 of the November Consultation Budget which can be found [here](#).
- 5.68 In order to fully deliver Net-Zero by 2030 however, this would require additional investment in excess of £200 million.

### **Risks**

- 5.69 The Medium-Term Financial Strategy (Appendix 1) sets out the financial risks to the budget figures in this report, including those relating to inflation, pay and pensions.

### **Equality Assessment**

- 5.70 The Mayor has required in his Guidance that the proposals in the LFC's Budget Submission should be assessed to further address equality, poverty, economic inequality and social integration in London. An equality analysis is set out at Appendix 5 to comply with this requirement.

### **Medium-Term Financial Strategy and Reserve Strategy**

- 5.71 The Fire and Rescue National Framework sets out the documents each Fire and Rescue Service (FRS) is required to produce, which include an integrated risk management plan, an annual statement of assurance (to be published later this year) and its financial plans including an efficiency plan, a Medium-Term Financial Strategy and a Reserves Strategy.
- 5.72 To meet this requirement a Medium-Term Financial Strategy are attached to this report at Appendix 1. The Medium-Term Financial Strategy has been updated to also meet the requirements of an Efficiency Plan covering 2025-26.

### **The Financial Position as at the end of December 2024**

- 5.73 As at the end of quarter three of 2024-25 the Brigade was forecasting an overall overspend position of £8.0 million, which is to be covered by reserves. The structural factors that led to the overspend (such as operational overtime) have been accounted for in the budget and savings proposals for 2025-26.

### **Reserves**

- 5.74 To meet the requirement of the Local Government Act 2003 in respect of adequacy of reserves and demonstrate compliance with the guidance on local authority reserves and balances issued by CIPFA the GLA and the functional bodies must provide:
- a statement of policy on reserves and contingencies
  - details of all reserves and general balances
  - an analysis and explanation of the expected movements on reserves between the start and end of each year from 1 April 2025 to 31 March 2027
  - in the case of earmarked reserves held for purposes beyond 31 March 2024, an indication should be given as to when they are likely to be applied
  - explanation of why reserves need to not only be adequate but why they are necessary.

5.75 The Reserves Policy is set out in the Medium-Term Financial Strategy. The corporate financial risk assessment has been refreshed in support of this. That assessment sets out the potential unbudgeted payments the LFC may be required to make if risks are realised and is used to inform the minimum general reserve requirement.

5.76 The table below sets out the forecasted reserves position at the end of 2025-26 and the following two financial years.

Table 5: Reserves position 2025-26 to 2027-28

Reserve	Forecasted Balance at 31/03/2025 (£m)	2025-26 Forecasted Use of Reserves (£m)	Forecasted Balance at 31/03/2026 (£m)	2026-27 Forecasted Use of Reserves (£m)	Forecasted Balance at 31/03/2027 (£m)	2027-28 Forecasted Use of Reserves (£m)	Forecasted Balance at 31/03/2028 (£m)
Fire Safety Improvement	15.9	(10.4)	5.5	0.0	5.5	0.0	5.5
Fire Safety and Youth Engagement	4.4	(1.5)	2.9	0.0	2.9	0.0	2.9
Community Risk Management Plan	1.9	(1.9)	0.0	0.0	0.0	0.0	0.0
Building Safety Regulator	1.7	0.0	1.7	0.0	1.7	0.0	1.7
Vehicle & Equipment Reserve	1.4	(1.4)	0.0	0.0	0.0	0.0	0.0
Pensions	1.1	0.0	1.1	0.0	1.1	0.0	1.1
Emergency Services Mobile Communication Programme	0.9	(0.9)	0.0	0.0	0.0	0.0	0.0
London Resilience	0.8	(0.6)	0.2	0.0	0.2	0.0	0.2
Recruitment	0.6	(0.6)	0.0	0.0	0.0	0.0	0.0
ICT Development	0.3	(0.3)	0.0	0.0	0.0	0.0	0.0
Grenfell Infrastructure	0.2	(0.2)	0.0	0.0	0.0	0.0	0.0
MTA	0.2	(0.2)	0.0	0.0	0.0	0.0	0.0
Sustainability	0.2	(0.2)	0.0	0.0	0.0	0.0	0.0
Communications	0.0	0.0	0.0	0.0	0.0	0.0	0.0
LFB Museum Project	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Finance Reserve	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Leadership Reserve	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Budget Flexibility	0.0	0.0	0.0	0.0	0.0	0.0	0.0
General Fund	15.7	1.7	17.4	2.0	19.4	0.7	20.1
<b>Total Reserves</b>	<b>45.3</b>	<b>(16.5)</b>	<b>28.8</b>	<b>2.0</b>	<b>30.8</b>	<b>0.7</b>	<b>31.5</b>

\*Note earmarked reserves with 0.0 have forecasted balances, but less than £50k.

5.77 It is expected that the level of general reserves will fall below 3.5 per cent of mayoral funding in the short term in 2025-26 to cover upfront staff restructuring costs in order to deliver sustainable savings. However, these will be replenished in 2026-27 to a level equal to 3.5 per cent.

#### Chief Finance Officer's comments on the adequacy of reserves

5.78 The LFC's earmarked reserves (including Budget Flexibility Reserve) have reduced over time as those funds have been utilised to support essential transformation activity in recent years. The current level of reserves is judged prudent by the Chief Finance Officer of LFB in the context of known future liabilities, risks and funding uncertainties facing the organisation and will be kept under review. In particular, the LFB aims to ensure there is a General Reserve equating to 3.5 per cent of Mayoral funding over the medium term (the temporary reduction in 2025-26 is due to one-off staff restructuring costs to deliver

sustainable savings). The budget includes stretching savings and efficiency targets, which senior leadership are committed to delivering (actions are already underway) and implementation of these will require ongoing monitoring. In the context of a challenging macro-economic environment, future financial challenges will to a significant extent depend on the outcomes of the government's Spending Review.

### Financial Risks and Opportunities

- 5.79 There are a range of risks and opportunities to the long-term financial position which are as yet unquantified in the estimates in this report, and these are outlined in the Medium-Term Financial Strategy at Appendix 1.

### Fees, Charges, Cost Recovery and Sponsorship

- 5.80 The LFB receives income from a range of charges, which are calculated on a cost recovery basis. These charges will be reviewed as part of finalising the budget for 2025-26 and will be reported in the final budget report in March 2025.

### Capital Programme 2024-25 to 2028-29

- 5.81 The Financial Position as at the end of September for Q2 was used as a base starting point in the November budget submission, however this has then been updated to reflect any known changes since then. This revised position based on latest forecast has been used for 2024-25. The proposed capital expenditure is £50.6 million in 2025-26 (compared to £53.7 million in the November budget submission) and the total over the five-year period to 2028-29 is now £241.2 million (compared to £248.7 million in the November budget submission). The overall capital programme is summarised in the table below:

Table 6: Capital Programme Summary

Project	2024-25	2025-26	2026-27	2027-28	2028-29	TOTAL
	£m	£m	£m	£m	£m	£m
<b>Capital Schemes</b>						
Properties	22.2	41.7	46.0	64.5	34.1	208.5
Fleet Replacement Plan	1.4	1.7	6.6	5.2	10.5	25.4
ICT Projects	4.2	11.8	10.6	3.5	2.5	32.6
Communications Project	0.1	0.3	0.3	0.0	0.0	0.7
Operational Policy Equipment	0.1	0.7	0.0	0.0	0.0	0.8
Optimism Bias (10 per cent)	(2.8)	(5.6)	(6.4)	(7.3)	(4.7)	(26.8)
<b>Total Expenditure</b>	<b>25.2</b>	<b>50.6</b>	<b>57.1</b>	<b>65.9</b>	<b>42.4</b>	<b>241.2</b>
<b>Capital Financing</b>						
Revenue Contributions	0.3	0.0	0.0	0.0	0.0	0.3
Capital Receipts	0.0	0.0	0.0	0.0	0.0	0.0
Capital Grants	1.7	0.6	0.2	0.0	0.0	2.5
External Borrowing*	23.2	50.0	56.9	65.9	42.4	238.4
<b>TOTAL Funded Financing</b>	<b>25.2</b>	<b>50.6</b>	<b>57.1</b>	<b>65.9</b>	<b>42.4</b>	<b>241.2</b>

\*Borrowing is currently shown as external, but it is expected that some of the borrowing will be using internal funds.

- 5.82 The proposed increase in property-related capital expenditure over the coming years is partly due to further investment in the 'Privacy for All' project but in large part due to the planned investment in a new LFB Headquarters on Brigade-owned estate, subject to business case assessment of the value for money case for this against alternatives including rental options.

- 5.83 Appendix 6 includes the financing of the capital programme for the next four years together with the approved prudential borrowing limits. Details of the next five years, to 2028-29, are included in the Mayor's Capital Spending Plan, and are funded by the capital financing costs reflected in the LFC revenue budget submission. The costs of borrowing are within both affordability and borrowing limits.

### Capital Strategy

- 5.84 The CIPFA Prudential Code 2017 sets out a requirement for local authorities to produce a Capital Strategy, to form part of an authority's integrated revenue, capital and balance sheet planning. The Mayor's Budget Guidance requires that the Capital Strategy covers a 20-year period, and forms part of the LFC's Budget Submission. Details of the current capital programme are included in Appendix 6.

The table below sets out the summary capital ambition from 2029-30 to 2043-44 in five-year intervals.

Table 7: Capital ambition 2029-30 to 2043-44

Project	Years 2029- 2034	Years 2034- 2039	Years 2039- 2044	Total
	£m	£m	£m	
<b>Capital Schemes</b>				
Properties	76.0	85.0	97.0	<b>258.0</b>
Fleet Replacement Plan	53.0	24.0	40.0	<b>117.0</b>
ICT Projects	41.0	20.0	25.0	<b>86.0</b>
<b>Total Capital Expenditure</b>	<b>171.0</b>	<b>129.0</b>	<b>162.0</b>	<b>461.0</b>
<b>Capital Financing</b>				
Capital Receipts	0.0	0.0	0.0	<b>0.0</b>
Capital Grants	0.0	0.0	0.0	<b>0.0</b>
External Borrowing	171.0	129.0	162.0	<b>461.0</b>
<b>TOTAL Funded Financing</b>	<b>171.0</b>	<b>129.0</b>	<b>162.0</b>	<b>461.0</b>
<b>Unfunded Capital Expenditure</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

### Strategic Drivers

- 5.85 The requirements for the LFC to produce a balanced budget are set out in the body of this report.

## 6 Values comments

- 6.1 The LFC notes the Fire Standards Board requirements around adopting and embedding the Core Code of Ethics at an individual and corporate level. Following extensive engagement, the LFC has introduced Brigade values which build on and do not detract from the Code of Ethics.
- 6.2 The Brigade values are:
- Service: we put the public first
  - Integrity: we act with honesty
  - Teamwork: we work together and include everyone
  - Equity: we treat everyone fairly according to their needs
  - Courage: we step up to the challenge
  - Learning: we listen so that we can improve
- 6.3 LFB values were launched on 4 December 2023 at an all staff briefing. The six new values are underpinned by a framework that describes the behaviours that best demonstrate each value. The values and behavioural framework relate to how staff treat the public and colleagues.

- 6.4 An Advisory Panel provides challenge and advice on the activities and proposals to address the findings from the Culture Review and other related reports. The Culture Transformation programme has the values at the core of improvements and outcomes it is seeking to achieve.

## 7 Equality comments

- 7.1 The LFC and the Deputy Mayor for Fire 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.
- 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 Appendix 5 sets out an Equality Impact Analysis (EIA) of Budget 2025-26 and the associated budget processes.



## **8 Workforce comments**

- 8.1 LFB's recognised trade unions are being consulted on organisational change proposals for 2025-26, and any comments will receive a response and be reported to Commissioner's Board as appropriate. The deletion of operational posts would not require any staffing reductions as operational staff who are currently occupying such roles would be posted to alternative positions at same or similar rank. A number of occupied FRS posts are impacted, and a collective and individual set of consultations are currently underway.
- 8.2 A separate Equalities Impact Assessment (EIA) has been prepared and published for the collective consultation on organisational change that is necessary to deliver a balanced budget.

## **9 Procurement comments**

- 9.1 The resource requirements to ensure that Procurement and Commercial can facilitate and meet the required commercial needs of the LFB at both CRMP Programme and Business as usual level are set-out and included in the investment sections of the report.

## **10 Communication comments**

- 10.1 This report shall be published on the LFB website under the decisions made by the London Fire Commissioner.

## **11 Financial comments**

- 11.1 This is a financial report and therefore all the financial implications are set out in detail within the report.

## **12 Legal comments**

- 12.1 Under section 9 of the Policing and Crime Act 2017, the London Fire Commissioner (the "Commissioner") is established as a corporation sole with the Mayor appointing the occupant of that office. Under section 327D of the Greater London Authority 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.
- 12.2 Section 1 of the Fire and Rescue Services Act 2004 states that the Commissioner is the fire and rescue authority for Greater London. The Commissioner is also a 'best value' authority under the Local Government Act 1999 and must make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency, and effectiveness.
- 12.3 The statutory provisions relating to the setting of the Commissioner's budget are contained in the Greater London Authority Act 1999. Schedule 6 of the Act sets out the process for the development and approval of the GLA's consolidated budget and the various component budgets of the functional bodies such as the Commissioner. Paragraph 2 of Schedule 6 requires the Mayor to prepare a draft component budget for the Commissioner and for each of the other constituent bodies which make up the GLA's consolidated budget. The Mayor must consult the Commissioner before preparing the component budget and the London Assembly before producing a consolidated budget. In preparing the draft he must have regard to representations which he has received as a result of the consultation process.
- 12.4 The Mayor annually updates his budget guidance in order to take account of his mayoral priorities and legislative changes. The Commissioner must have regard to this guidance in preparing the LFC's representations during the budget consultation process.

- 12.5 Additionally, the Fire and Rescue National Framework for England ("Framework") issued by the Secretary of State under section 21 of the Fire and Rescue Services Act 2004 requires the Commissioner to produce a medium-term financial plan, efficiency plan, and a reserves strategy. The Framework permits these to be combined and included within the parent authorities' documentation as has been done in this report.
- 12.6 By direction dated 1 April 2018, 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 (the "Deputy Mayor"). Paragraph (d) of Part 2 of this direction requires the prior approval of the Deputy Mayor before, "The London Fire Commissioner makes an annual budget submission to the Mayor prior to the Mayor's Consultation Budget being issued."
- 12.7 This report sets out the Commissioner's proposed Budget Submission to the Mayor (incorporating the requirements of the Framework) thereby meeting the Commissioner's responsibilities under the above legislation and Framework.
- 12.8 The Medium-Term Financial Strategy (MTFS), Efficiency Plan and Reserve Strategy are documents referenced as required in the Fire and Rescue Services National Framework. These documents form part of the Budget Submission. Under S327G of the Greater London Authority Act 1999 (GLA Act 1999) a document that is prepared and published by the LFC in accordance with 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 must, before publication, be sent in draft to the Mayor and the Assembly (in these circumstances the Fire Committee). The document cannot be published by the LFC without Fire Committee having an opportunity to review the draft document(s) and report to the Mayor, and the Mayor needs to approve the document(s) before it may be published by the LFC.
- 12.9 It is commonly accepted that the MTFS, Efficiency Strategy, Reserve Strategy, and the Statement of Assurance (the subject of a separate report) are documents that fall within S327G and accordingly the above provisions apply.
- 12.10 The Mayoral Directions provide for additional processes namely that 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. "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 (l)(a) and or (b) of the GLA Act 1999.
- 12.11 In addition, the Mayoral Directions provide that prior consultation with the Deputy Mayor is required on anything that requires the consent of the Mayor.

**List of Appendices**

Appendix	Title	Protective Marking
1	Medium-Term Financial Strategy (MTFS)	None
2	Revised Savings	None
3	Revised Investments	None
4	Community Risk Management Plan (CRMP) Investments	None
5	Equality Analysis	None
6	Capital Strategy	None

## **Appendix 1**

### **Medium-Term Financial Strategy (MTFS)**

#### **1 Introduction**

This report sets out the Medium-Term Financial Strategy (MTFS) for the London Fire Commissioner (LFC) covering the period 2025-26 to 2027-28.

The MTFS is a key part of the LFC's financial management framework and helps to ensure that resources are managed into the medium-term and supports better alignment of those resources to strategic priorities. It improves financial planning and strategic financial management and provides the financial context within which budgets are set.

The MTFS must set out the financial plans for multiple years, have regard to affordability and consider the interdependencies of both revenue and capital income and expenditure.

Under the CIPFA Prudential Code for Capital Finance, the LFC is also required to produce an annual Capital Strategy which sets out the investment plans, considering the affordability of those plans.

#### **2 Economic contexts**

This budget is being set at a time of recognised macroeconomic uncertainty both in the UK and globally. Economic growth is slower than previously forecast at the time of the Chancellor's Budget statement in October 2024. Inflation is currently greater than the target rate of 2 per cent and could be adversely impacted further through tariffs and disruption to world trade.

Interest rates have remained high and this impacts on the LFC through the borrowing to support the capital programme. The LFC has been able to make use of capital receipts to fund the capital programme for several years, however these are now exhausted and so borrowing will be required. Interest rates that the LFC is able to secure borrowing will impact on the total costs of this borrowing, and feed into the capital financing costs in the revenue budget. The LFC is able to secure some slightly preferential interest rates for some investments as part of achieving the target of being carbon neutral by 2030, through GLA Green Funding but this is limited.

Public sector finances remain challenging, exacerbated by the need to increase defence spending due to geopolitical concerns. The Government has initiated a Spending Review, which is expected to set budgets over the three years from 2026-27. The Spending Review is expected to conclude in June 2025.

#### **3 Background**

On 31 July 2024 the Mayor issued his latest Budget Guidance setting out the GLA's estimates of the Group budgets for each functional body, covering the period to 31 March 2028 and has been issued to underpin the process of setting the 2025-26 annual budgets.

This Mayoral Budget Guidance includes estimates of business rates and council tax revenue and certain assumptions have been made in those estimates. The LFC is predominantly reliant on funding from the Mayor, and his decisions on distribution of business rates and council tax.

The Mayor takes decisions on the distribution of the GLA business rates and council tax income and it is therefore important that the LFC can demonstrate a strategic approach to its finances enabling the achievement of strategic objectives whilst at the same time delivering efficiencies.

#### **4 London Fire Commissioner strategic priorities**

Following development in 2022, on 1 January 2023, the London Fire Commissioner published a new strategy which sets out the strategic ambition for the Brigade for the next seven years. It is called *Your London Fire Brigade* and replaces the London Safety Plan 2017; it meets the requirements of Government's Fire and Rescue National Framework for England to produce a Community Risk Management Plan (CRMP).

The CRMP pulls together the Brigade's existing work as well as ideas for the future, so that there is one plan which sets out all the organisational priorities. The CRMP incorporated outstanding actions to address findings from Phase One of the Grenfell Inquiry and the previous inspections by His Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS).

It was developed prior to the publication of the Independent Culture Review, and results from the second full inspection by HMICFRS. This has meant that the CRMP had to be adapted in the light of those subsequent reports.

The overarching framework of the CRMP has not required amendment. It describes six services that the Brigade will provide to London, Londoners and visitors to London in response to the London Fire Commissioner's Assessment of Risk. Three of those services are long-established and encompass our work to help:

- Help prevent fires and other incidents from occurring.
- Ensure the built environment can protect people to enable them to escape should a fire or other incident occur.
- Respond to emergencies.

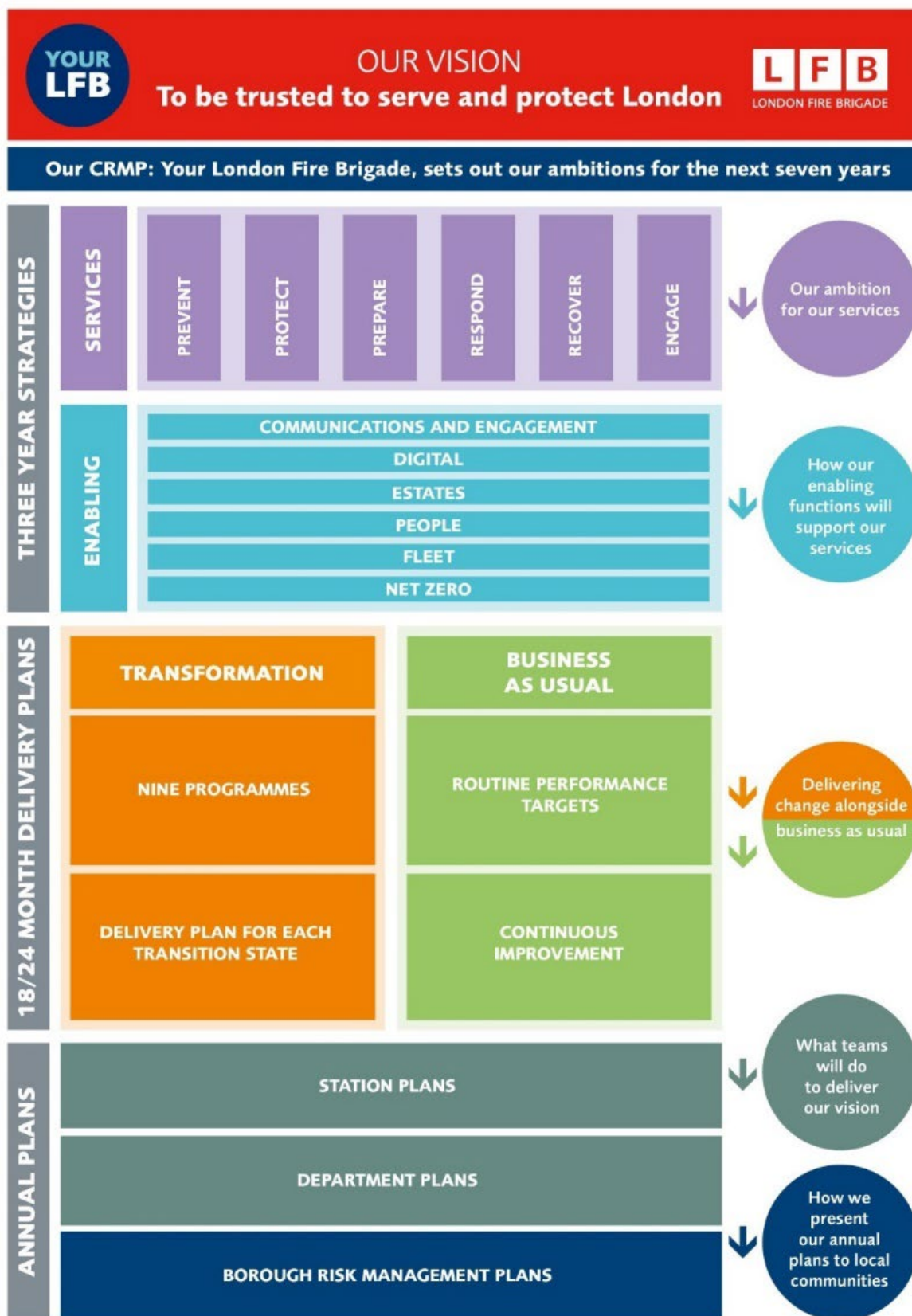
The Plan describes three newly defined services so that the Brigade can work more effectively with people so that they not only are safer, but they also feel safer. Those three new services are:

- Prepare – the Brigade will work with local communities so that they can be better prepared should an incident occur and take action to make themselves safer, prior to our arrival on scene.
- Recover – the Brigade will work with local communities providing advice and signposting people to ongoing support so that they can recover more quickly after an incident has occurred.
- Engage – the Brigade will work more closely with local communities and reach out to communities whose voices are seldom heard to understand their perceptions of safety and work in partnership with them to improve their safety.

The Plan also sets out the LFC's ambition for transformation under eight commitments, which have been translated into programmes within the Brigade's transformation portfolio of change. These are:

- Providing localised, risk-based services.
- Improving access to services.
- Adapting services in response to changing risk.
- Designing services that are responsive to community needs.
- Enabling people to be the best they can be.
- Aligning support services to meet the needs of front-line staff.
- Being more evidence-led.
- Building a safer future for all.

The Plan is supported by service strategies and actions are being translated into local plans at the department, borough and station level, as set out in the graphic on the next page.



This has facilitated a developing approach to delivering change and has informed the identification of programme-based budget requirements. Some of these are in addition to existing plans.

As with previous plans, the CRMP is not fully funded in advance; funding settlements for future years are uncertain and costs cannot be identified until detailed business cases have been developed. Resource requirements have been identified as part of these commitments and have been considered as part of prioritisation of resources as part of this budget process.

Funding figures as set out by the Mayor represent increases in funding in each year, with an additional £41.3 million provided in 2025-26, a further £19.3 million in 2026-27 and a further £18.8 million in 2027-28. To achieve the requirement for a balanced budget in 2025-26 the LFC has carried out a budget setting exercise to identify the savings required as set out in its Budget Submission to the Mayor.

## **5 The Strategy**

Given the wider economic context and the significant transformation journey which the LFC is on, the Medium-Term Financial Strategy is based on the following key principles:

- The number of fire stations, appliances and firefighters are not reduced.
- There are no reductions in regulatory capabilities.
- Delivery of the Community Risk Management Plan (CRMP).
- Appropriate investment continues to be made in transformation activity, including culture change.
- Resources are available to meet the recommendations arising from both the Grenfell Tower and Manchester Arena Inquiries and also the improvement plan from the HMICRFS inspections.
- Adequate investment in core infrastructure is maintained.
- Appropriate resources are set aside to deliver key strategies and priorities.
- Earmarked reserves will be maintained for specific purposes which are consistent with achieving its key priorities. The use and level of earmarked reserves will be reviewed at least annually.
- The General Fund balance will be maintained at a sustainable level.
- Opportunities for innovative and modern ways working will be adopted as far as possible.

## **6 Assumptions**

The Mayor has proposed that the GLA and its functional bodies should assume for planning purposes that their allocation of discretionary income from the GLA for 2025-26 and future years is based on a 'central scenario'. As part of that central scenario:

- Business rates funding is assumed to increase by CPI inflation (estimated at 2 per cent).
- Council tax Band D precept is assumed to increase by 2 per cent.
- The Council tax base is assumed to increase by 1 per cent a year.

The main assumptions in the MTFS are:

- Assumptions regarding staff pay and inflation in each year.
- Each post has pay progression until the top of the grade/operational competence is reached.
- Inflation is applied to other areas based on contractual requirements, linked to CPI, RPI and Average Weekly Earnings (AWE) as appropriate.

## 7 Medium-Term Financial Strategy 2025-2028

The Medium-Term Financial Strategy sets out the proposed revenue budget for the next financial year (2025-26) 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.

	2025-26	2026-27	2027-28
	£'m	£'m	£'m
Corporate Services	87.1	83.2	87.1
Preparedness and Response	391.3	401.0	408.4
People	8.9	8.6	8.8
Transformation	3.5	4.5	4.1
Prevention, Protection and Policy	42.9	46.6	47.3
Communications	3.2	4.0	4.2
Saving yet to be identified	0.0	(18.0)	(16.7)
<b>Net Service Expenditure</b>	<b>536.9</b>	<b>529.9</b>	<b>543.2</b>
Capital Financing	17.5	25.3	32.1
Interest Receivable	(1.5)	(1.5)	(1.5)
<b>Net Expenditure</b>	<b>552.9</b>	<b>553.7</b>	<b>573.8</b>
Transfer to / (from) Reserves	(16.5)	2.0	0.7
<b>Financing Requirement</b>	<b>536.4</b>	<b>555.7</b>	<b>574.5</b>
Un-ringfenced Government Grants	4.4	4.4	4.4
Retained Business Rates	300.2	305.9	311.1
Council Tax Collection Fund Surplus / (Deficit)	0	0	0
<b>Council Tax Requirement</b>	<b>231.8</b>	<b>245.4</b>	<b>259.0</b>

## 8 Efficiency Plan

The Fire and Rescue Service National Framework for England provides for certain documents to be produced and this includes an Efficiency Plan.

The LFC published its first efficiency plan under the London Fire and Emergency Planning Authority (LFEPA) in 2016 covering four years to 2020. The LFC published a Productivity and Efficiency Plan as part of the Budget 2024-25.

To meet the ongoing requirement, the proposals set out in the LFC Budget Submission to the Mayor should be considered as the Efficiency Plan for the LFC covering the financial year 2025-26.

The LFC has a Value for Money (VFM) Principles Framework in place that is used to underpin the strategic priorities and inform future efficiency plans and budget setting.

These VFM principles have been adopted by the LFC's Investment & Finance Board. The framework includes:

- An outcomes-based approach to service delivery models to be adopted in line with the CRMP (Community Risk Management Plan) and the Target Operating Model.
- A Priority budgeting approach will be adopted in budget setting processes to ensure resources are aligned with key priorities and strategic objectives.



- Organisational structures will be reviewed to ensure they are fit-for-purpose in meeting statutory obligations but lean and efficient.
- Business processes and related systems will be reviewed to ensure that they are aligned with modern, best practice and seek to maximise the use of digital solutions.
- Maximisation of procurement benefits to drive out value-for-money in commercial contracts.
- Opportunities for collaboration with the GLA, the fire and rescue sector and other public sector bodies will be proactively sought.
- Early and proactive engagement with the unions will be undertaken on any potential pay awards.

This is not an exhaustive list but gives an indication of the LFC's approach to delivering value for-money and efficiency savings. These VFM principles will be updated to reflect the further proposals to strengthen financial controls and efficiencies set out in this Budget Submission.

On productivity of staff, this is not an easy issue to measure accurately or consistently across services. Nevertheless, we are continually looking to improve productivity. For example, firefighters now carry out targeted and specific visits to triage lower risk premises to enable Inspecting Officers to focus on higher risk premises and increases our reach into the business community. Our change to the way we respond to Automatic Fire Alarms (AFAs) allow us to spend more time on protection work, such as fire safety checks in homes and businesses, as well as operational training. It will also reduce the risk to the public through fewer 'blue light' emergency responses. More broadly, the new set of KPIs linked to the CRMP that we have published will enable us to better understand and improve our productivity across a range of disciplines.

Section 5.46 of the main budget submission sets out the outcomes of previous and ongoing efficiency reviews, strengthened processes for business cases, aligning investments to strategic priorities. LFB have to submit an annual return to the National Fire Chiefs Council (NFCC) on its efficiency and productivity plan, with key targets of 2 per cent of non-pay efficiencies and increase productivity by 3 per cent on an annual basis. Across 2022-23 – 2024-25 the LFB submission included an average of 6.9 per cent of non-pay efficiencies which is well above the target set.

For 2025-26 a Financial Review has been undertaken to identify savings over the short to medium term to support the budget and including to support addressing the budget gap in 2025-26. This review was led by the Assistant Director for Finance Transformation and the Strategic Advisor (external to LFB). This work has identified further savings of £9.6 million in 2025-26, bringing the total savings for £2025-26 to £28.2 million.

## 9 Reserves

As part of our statutory obligations, the LFC Chief Finance Officer (currently the Director of Corporate Services) must consider the level of reserves needed to meet estimated future expenditure when calculating the budget requirement.

As part of the budget setting process, the CFO must provide a statement on the adequacy of reserves that is subject to an external audit review to assess value for money and a going concern opinion. The LFC's policy on reserves is contained within the MTFS principles highlighted above and are as follows:

- Due to the large number of risks regarding cost inflation the requirement to maintain its general reserve at a minimum of 3.5 per cent of core GLA funding has been reviewed by the CFO (Director of Corporate Services). It has been deemed appropriate to keep it at this rate over the medium term, however falling below this level on a temporary basis in 2025-26 to fund one-off staff restructuring costs to deliver sustainable savings, which will then be returned to a minimum of 3.5 per cent from 2026-27.
- The LFC will aim to balance its revenue budget over the period of the MTFS without reliance on the use of the general reserve.
- The LFC will maintain earmarked reserves for specific purposes which are consistent with achieving its key priorities.
- The use and level of earmarked reserves will be reviewed at least annually by the CFO who will give an opinion on their adequacy.

Reserve levels will also be monitored regularly as part of the LFB's existing financial reporting.

*Chief Finance Officer's comments on the adequacy of reserves:*

The LFC's earmarked reserves (including Budget Flexibility Reserve) have reduced over time as those funds have been utilised to support essential transformation activity in recent years. The current level of reserves is judged prudent by the Chief Finance Officer of LFC in the context of known future liabilities, risks and funding uncertainties facing the organisation and will be kept under review. In particular, the LFC aims to ensure there is a General Reserve equating to 3.5 per cent of Mayoral funding over the medium term (the temporary reduction in 2025-26 is due to one-off staff restructuring costs to deliver sustainable savings). The budget includes stretching savings and efficiency targets, which senior leadership are committed to delivering (actions are already underway) and implementation of these will require ongoing monitoring. In the context of a challenging macro-economic environment, future financial challenges will to a significant extent depend on the outcomes of the government's Spending Review.

## **10 Financial Risks**

### Pay and Inflation

The MTFS includes an assumption of a 2 per cent pay award for 2025-26 for all staff and in future years. This assumption will be reviewed as part of the 2025 national and local pay negotiation processes and considering inflation, affordability, and other factors. Each 1 per cent change in pay is equivalent to around £4m in cost for all staff groups. In addition to this, role-based allowances for operational staff are assumed to continue at an annual cost of approximately £2.5m per annum in pay-related costs.

### Government Funding and macro-economic factors

Central Government is currently carrying out a spending review of its expenditure including Fire, which will inform its budget allocations for 2026-27 and the subsequent two financial years. The LFC has made submissions to this process both as part of the National Fire Chiefs Council as well as through the GLA, but the results of this process and the impact on the LFC will not be known until later in 2025.

This risk is exacerbated in the current economic climate, with inflation remaining higher than expected and economic growth remaining low. Macro-economic factors at the global level (including tariffs and pressures to increase defence spending) are adding to this uncertainty.

### Funding from the Mayor

This report includes the Mayor's indicative funding allocations for LFC for planning purposes covering the next three financial years. However, there is significant uncertainty about the level of funding for future years due to a number of risks on the funding available to the Mayor, through retained business rates and the council tax, as well Government decisions on funding, including the Spending Review. The MTFS has been formulated using the central scenario totals set out in the Mayor's Budget Guidance 2025-26 but there is a risk that actual funding could be lower from 2026-27.

### Firefighter and Local Government Pension Schemes

The pensions schemes provided by the LFC present significant financial challenges. The pensions remedy that impacts all public sector pensions has a particularly significant impact of the Firefighter Pension Scheme, with the remedy to address the unlawful transitional protection impacting significant numbers of LFC staff. Managing the remedy and its implementation has already had significant financial impact for the LFC, in particular on employer pension contribution rates following the scheme valuation.

### Property and equipment costs

There is also a risk with the costs of property rents, particularly in central London, that could impact on future lease agreements/reviews. This includes the LFC Headquarters where a project is underway to confirm new arrangements with the approaching expiry of the lease on the current HQ at Union St. In addition to the cost associated with the new premises there will also be cost in vacating the current site, including possible dilapidations.

### Capital Expenditure and Financing

The capital budget can be subject to change during the year and any re-phasing or deferral due can also impact on funding requirements which in turn may have a debt charge (cost of borrowing) revenue impact.

The capital programme is currently proposed to be funded by a mixture of capital grants and borrowing and the associated debt costs have been calculated using the current forecast Public Works Loans Board (PWL) rates. Actual borrowing rates and resulting costs may be different.

A risk exists in relation to meeting the emission reduction targets for 2030 (Ultra Low Emission Fleet (ULEF) programme) for the replacement vehicles and associated equipment in that the technology and infrastructure, if available at all, may be more costly than existing vehicle technology, leading to additional capital financing costs. Existing vehicles may need to be replaced earlier than their expected replacement date, bringing forward capital expenditure.

More widely, the programme to achieve Carbon Net Zero by 2030 carries significant investment which is currently not fully funded. Additional external borrowing may be possible but the debt charges would currently be unaffordable, and therefore significantly impact on the ability of LFC to achieve a balanced budget without making substantial and unacceptable savings.

### Key operational systems

The Home Office will replace the existing Airwave contracts as part of the delivery of the Emergency Services Network (ESN). Existing contracts are subsidised, and the Home Office has provided assurance this subsidy will remain for the term of the Airwave Contract.

There could be significant financial pressures to LFC under any new contract provision for ESN as the Home Office may be unwilling to continue to subsidise a future system. The Emergency Services Mobile Communications Programme (ESMCP) have not yet issued a revised project timeline to deliver ESN. Once a credible date is available from the Home Office for the LFCs transition, the budget plans will be updated accordingly. The LFC currently holds an earmarked reserve against any anticipated costs of this work.

### Other risks

Significant demand continues to be placed on the Information and Communications Technology Department to meet new requirements and aid in the development of smarter systems for the LFC. This is at a time where resources are limited and as a result there is a risk that development of information technology solutions may be constrained.

Price increases are being considered by Thames Water which could affect the Water Team budget in Procurement. It is still subject to further discussions with the supplier and the cost impact is currently being refined.

Telecommunications income in respect of radio masts is forecast to be reduced in the future due to a reduction in the number of operators in the industry, as well changes to legislation impacting on the ability to raise income.

The saving proposals include material savings for income generated through the (Metropolitan Fire Brigade) MFB Act. This budget has recovered increased budgets approved in recent years; however, uncertainty remains on the extent to which increase in this income may continue.

### Legal costs

Whilst the LFC has insurance to cover legal costs in relation to legal claims, there is always the risk that there are legal costs which are not covered by the existing policies and/or insured amounts.

## **11 Conclusion**

The review of the MTF has been undertaken against a backdrop of significant funding uncertainty and during a period of national and global economic instability.

The LFC has been through a period of significant external scrutiny which has resulted in a significant transformation journey. It is important, therefore, that the Medium-Term Financial Strategy can support not only business-as-usual activity but also continuous improvement, including investment in activity such as operational training.

The MTFS sets out a balanced budget for 2025-26 but notes that further funding and/or savings are required from 2026-27 in order to ensure a sustainable position over the medium term. The outcomes of the government's Spending Review later in 2025 will therefore be an important determinant of the financial challenges for the LFB over the medium term,

## Appendix 2

### Savings

#### Existing Savings

Set out in the 2024-25 budget process and expected to be delivered from 2025-26 and inclusive of CRMP Programme delivery aligned to the relevant Senior Responsible Officer (SRO) or Director.

Directorate	2025-26 Saving £'000	2026-27 Saving £'000	2027-28 Saving £'000	Description
Corporate Services	(1,919)	(2,149)	(2,149)	Savings across the directorate including additional 'savings' identified through additional MFB Act income.
Preparedness and Response	(1,667)	(3,325)	(3,325)	This includes agreed savings and re-profiling of investment across the directorate.
People	(585)	(985)	(985)	This includes savings against a one-off pressure for occupational health and future reviews into delivery by the directorate.
Transformation	(110)	(115)	(115)	This includes a saving in resource to deliver change activities within programmes.
Prevention, Protection and Policy	(697)	(958)	(958)	This includes savings and efficiencies from across the directorate.
Communications	(505)	(505)	(505)	Reversal of one-off growth in prior year.
<b>Existing Savings - Total</b>	<b>(5,483)</b>	<b>(8,037)</b>	<b>(8,037)</b>	

## New Savings

All new savings set out within the 2025-26 budget process. These are in addition to the existing savings set out in the table above as part of the prior year budget processes. In total there are savings to be achieved in 2025-26 of £28.2 million.

Directorate	2025-26 Saving £'000	2026-27 Saving £'000	2027-28 Saving £'000	Description
Corporate Services	(3,013)	(3,218)	(3,318)	A wide range of savings across the directorate, including systems, sanitisation and utilities.
Preparedness and Response	(3,015)	(3,632)	(3,632)	A wide range of savings across the directorate, including more efficient training course provision and savings on fuel.
People	(512)	(512)	(512)	Includes savings against the external complaints service contract.
Transformation	(1,207)	(1,207)	(1,207)	Savings across the directorate.
Prevention, Protection and Policy	(3,407)	(3,407)	(3,407)	Includes a saving from the Building Safety Programme team which is no longer required to cover secondments and savings from across the directorate. These savings do not impact on our regulatory capabilities which are being protected.
Communications	(68)	(68)	(68)	Includes savings generated from secondment of staff.
Savings Review / Cross Cutting	(9,630)	(9,630)	(9,630)	Cross cutting savings from recruitment controls, review of sickness absence to reduce overtime, contracts review, data and process efficiencies.
CRMP Programmes	(1,856)	0	0	Net reduction against previous assumptions.
<b>New Savings - Total</b>	<b>(22,707)</b>	<b>(21,674)</b>	<b>(21,774)</b>	

**Appendix 3**  
**Investments 2025-26**

Directorate	2025-26 Investment £'000	2026-27 Investment £'000	2027-28 Investment £'000	Description
Corporate Services	1,190	1,190	1,190	Includes a reduction in telecoms income, and expenditure on essential software licenses, facilities management and legal.
Preparedness and Response	604	604	604	This includes additional staff resource to support the directorate in key service delivery.
People	660	660	660	Additional investment within the Professional Standards Unit and investment requirements as part of service re-design.
Transformation	0	0	0	N/A
Prevention, Protection and Policy	55	55	55	A reduction in income in 'fire kills' grant and reduction in potential income due to change in policy of AFAs (noting that this income has never been realised previously so it is a budgetary correction).
Communications	0	0	0	N/A
<b>Existing Investment - Total</b>	<b>2,509</b>	<b>2,509</b>	<b>2,509</b>	

#### **Appendix 4**

#### **Community Risk Management Plan (CRMP) Investments**

The table below shows the total investment required for CRMP programmes after consideration of the overall resources to allocate to programmes. Some programmes have been paused, though some of the work will now be delivered by business-as-usual teams and some projects will continue outside of the programme approach.

<b>Programme</b>	<b>Budget 2024-25 £'000</b>	<b>Budget 2025-26 £'000</b>	<b>Description of Investment in 2025-26</b>
Localised Services	0	748	Delivery of One Risk in revised format. Note that this funding may be supplemented or some of it replaced by appropriate use of Protection Grant.
Accessible Services	515	0	Paused until 2026-27.
Modern Services	6,298	8,128	Delivery of Modern Firefighting Strategy.
Community Partnership	0	0	Paused until 2026-27.
Culture Transformation	4,758	3,030	Range of initiatives which stemmed from Independent Culture Review including EDI strategy, undress uniforms project, Professional Standards Unit, leadership redesign.
Streamlined Services	533	512	Delivery of new corporate ERP systems (to replace obsolete systems).
Data-driven Performance	175	0	Paused until 2026-27.
Sustainable Services	588	120	Electrical Vehicle Charging maintenance. The Carbon Net Zero project will continue outside of the programme approach.
Change Capability	252	0	Paused until 2026-27.
<b>Total</b>	<b>13,119</b>	<b>12,538</b>	



## Appendix 5

### Equality Analysis

#### Equality Analysis / Equality Impact Assessment (EIA)

A. Name and the nature of the programme/ activity
London Fire Brigade Budget Submission 2025-26
B. Reason for Equality Impact Assessment
<ul style="list-style-type: none"><li>• Proposed change to an existing programme/ activity</li><li>• Undertaking a review of an existing programme/ activity</li></ul> <p>This Equality Impact Assessment has also been prepared to meet the requirements of the Mayor's Budget Guidance which sets out that all members of the GLA Group must demonstrate how their plans will:</p> <ul style="list-style-type: none"><li>• support the actions in the Building A Fairer City plan</li><li>• impact on different groups of Londoners; this includes those sharing characteristics protected by the Equality Act 2010 and low-income Londoners</li><li>• strengthen activities to further address structural inequalities in London – particularly poverty and economic inequality</li><li>• fulfil the Equality Objectives for the functional body</li></ul> <p>This Equality Impact Assessment needs to be considered in the context of the challenging financial position that has been set out in the body of the LFB's Budget Submission. That submission currently includes a total saving requirement of £28m, which if not delivered would have the potential to impact London's diverse communities.</p> <p>These requirements are addressed in the following sections, which reflect funding that has been provided within this budget submission for 2025-26 for these activities.</p> <p><b><u>Building a Fairer City</u></b></p> <p><b>The Building a Fairer City plan includes four key areas on labour market inequality, financial hardship and living standards, equity in public services and civil society strength.</b></p> <p><u>Labour market inequality</u></p> <p>Through continued investment in culture transformation and People Services, the LFB continues to focus on increasing the diversity of its workforce. A diverse workforce allows the LFB to integrate and become closer to its communities. If local communities trust us, the LFB is better able to gain their cooperation when it offers vital fire safety advice.</p> <p>Some of the most vulnerable people in society come from diverse backgrounds and the LFB needs to understand their lifestyles in order to safeguard them against the risk of fire. This applies to all roles, from inspecting officers to control staff, community safety teams and firefighters.</p> <p>A diverse team gives us a broad variety of skills, experience, problem solving and an opportunity to learn from each other's differences. In turn this helps us to do the best job we can to keep London and all its communities safe.</p>

## Equity in public services

### Community Forum

The Brigade's Community Forum, which was launched in 2022, has been instrumental in helping the Brigade to transform over recent years by bringing together individuals to share their perspectives and influence services. The Community Forum has 15 members who represent different communities from across London. Moving forwards, the Brigade wants to develop local forums to hear from communities on a more personal level. To accomplish this, the new Steering Group will play a crucial role in designing how the local community forums will operate, allowing for more localised and focused engagement. These forums will aid the Brigade in ensuring that even more communities have a voice in shaping the services they receive.

The Community Forum is made up of Londoners who have experienced LFB's services or who are experts through lived experience. Members include survivors of the Grenfell Tower and New Cross fires, disability campaigners and representatives from faith communities and social housing. Members bring a unique and valuable insight to discussions around fire safety and the work of the Brigade.

## Equity as an LFB Value

Our values are a set of guiding principles that help us to create a safe and professional workplace culture. In turn, they also help us achieve our vision - to be trusted to serve and protect London.

Our people across the Brigade have helped to define these values by sharing their experiences of London Fire Brigade at its best. We've added input from the communities we serve and made sure they align with the [NFCC Code of Ethics](#).

Our values are a key part of the way we work, and a foundation for delivering the goals of our Community Risk Management Plan: [Your London Fire Brigade](#). Our values are not new ideas; they have always been part of the Brigade and our people can live these values every day.

The six values are:

- Service
- Integrity
- Teamwork
- Equity
- Courage
- Learning

The value of equity can be demonstrated as an individual by:

- I seek to understand and learn from people with different perspectives
- I celebrate the achievement of others
- I give others the space to be themselves
- I am compassionate and kind to others and support their individual needs
- I do the right thing when nobody's looking

**Before making decisions all reports provide the LFC with the assurance that the Brigade values are reflected in its decision-making, policies, procedures and processes and outline how the recommended decisions align with and further the Brigade values.**

## Culture Review

Nazir Afzal's Independent Review of London Fire Brigade's culture was published in November 2022 and reported that LFB was institutionally racist and misogynistic, and that disabled and neurodiverse people received poor treatment. The LFB accepted the findings and committed to change.

The Culture Programme established an action plan covering five themes: Workplace where everyone is afforded dignity, better engagement with London's communities, leadership model of trust, improve wellbeing and transform People Services.

## **Impact on different groups of Londoners**

We actively encourage and welcome all applicants to LFB, regardless of age, disability, transgender status or gender identity, marriage and civil partnership status, pregnancy and maternity, race, ethnicity or nationality, religion or belief, sex and sexual orientation.

We have a zero tolerance of discrimination and a strategy in place to ensure that no candidates are treated unfairly. Applicants can tell us if they require reasonable adjustments to provide them with equal opportunity in our recruitment processes, and our recruitment team are on hand to answer any questions.

We are members of:

- The Employers Network for Equality and Inclusion (ENEI)
- The Business Disability Forum
- Stonewall (LGBT inclusion), and
- The Disability Confident Scheme

These organisations provide us with support and help us to become an employer of choice for the diverse communities across London:

## **Strengthen activities to further address structural inequalities in London**

### Improving our workplace culture

We want everyone in the Brigade to feel valued, safe and accepted in their workplace and to put public service at the heart of what we do. We're working hard to achieve that.

We are listening and talking as we improve

- Our senior leaders visited every Watch and team to discuss [our new values](#) and what they mean. Our leaders also visited our people to discuss our culture after the publication of the review.
- We run online all staff briefings every month, focusing on important topics including culture.
- Our Commissioner speaks at four in-person briefings at Headquarters every year, and attends department meetings, joint training sessions and fire stations.
- We introduced a briefing for staff – Your LFB Update – which is sent every eight days and gives regular information about culture-related and other changes in the Brigade.

## Community Risk Management Plan.

In its delivery plan the LFB sets out what it will achieve over the life of the Community Risk Management Plan, which it is calling Your London Fire Brigade. It is based on the four new pillars and eight new commitments set out in Your London Fire Brigade. These pillars are:

- Engaging with YOU
- Protecting YOU
- Learning from YOU
- Representing YOU

Each of these pillars will impact on the services we provide, helping us to improve them so that we can work with the public to make them safer.

Detailed Performance information against the LFB's targets is set out in its published quarterly performance reports. This includes the performance data highlights below.

- In October 2024, LFB launched its second full annual staff survey to all employees and the percentage of staff that 'would recommend LFB as a place to work (C6-01)' rose from 54 per cent in 2023 to 64 per cent in 2024, and thus within the target of 60 per cent.
- Station staff time spent on prevention (C4-01) and Station staff time spent on protection (C4-02) have both seen positive shifts in the data over the last quarter, and both are reporting as on target. The second version of the Fire Station Performance report combined with a performance management framework have contributed to this improvement.
- The new target of 40 per cent for Ratio of high-risk audits (C3-06) has been met. The positive improvement reflects work to ensure that officers are trained as fully competent and qualified, together with reviewing the Relative Risk Level (RRL) for premises where remediation is required.
- In October 2024 LFB stopped attending automatic fire alarms in non-domestic buildings (C4 04), between the hours of 07:00 – 20:30 unless a call is also received from a person reporting a fire, and as a result

Whilst the LFB is not yet meeting all its targets it is making significant progress as summarised below.

- The staff composition for staff with disabilities (C1-04) remains below the target. Several positive actions are being put in place to improve recruiting of underrepresented groups as well as disability disclosure rates.
- The number of triages via the Online Home Fire Safety Checker (C2-01) has decreased from last quarter and is off target. LFB has invested in a new four-month paid-for online campaign, which began on some channels in December and will be increased in January.
- Staff sickness (C5-03) and the number of RIDDORs (C5-01) remained off target in Q3.
- Fire injuries (C7-02) is off target against the new and more challenging target that aims for LFB to be the best performing FRS in England. We are aiming to achieve this by the end of the CRMP. While cookers remain the top ignition source for fire injuries, vehicle related fire injuries (including e-bikes and e-scooters) have increased as well as fire injuries caused by batteries and generators (such as lithium-ion batteries).
- The number Accidental fire deaths in the home (5 year rolling average) (C7-04) was slightly above the new and more challenging target set for 2024-25.

## Fulfil the Equality Objectives for the functional body

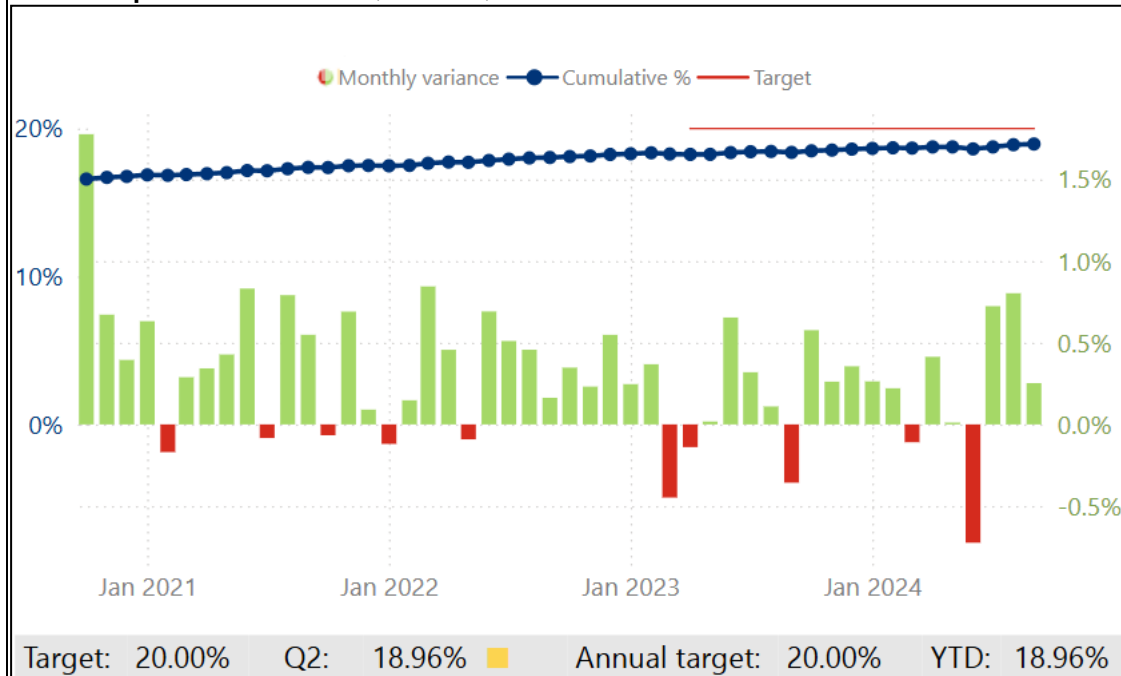
The LFB's Togetherness Strategy is split into four pillars, these are:

- Building a culture of belonging
- Being inspired by difference
- Being at the centre of London and our Communities

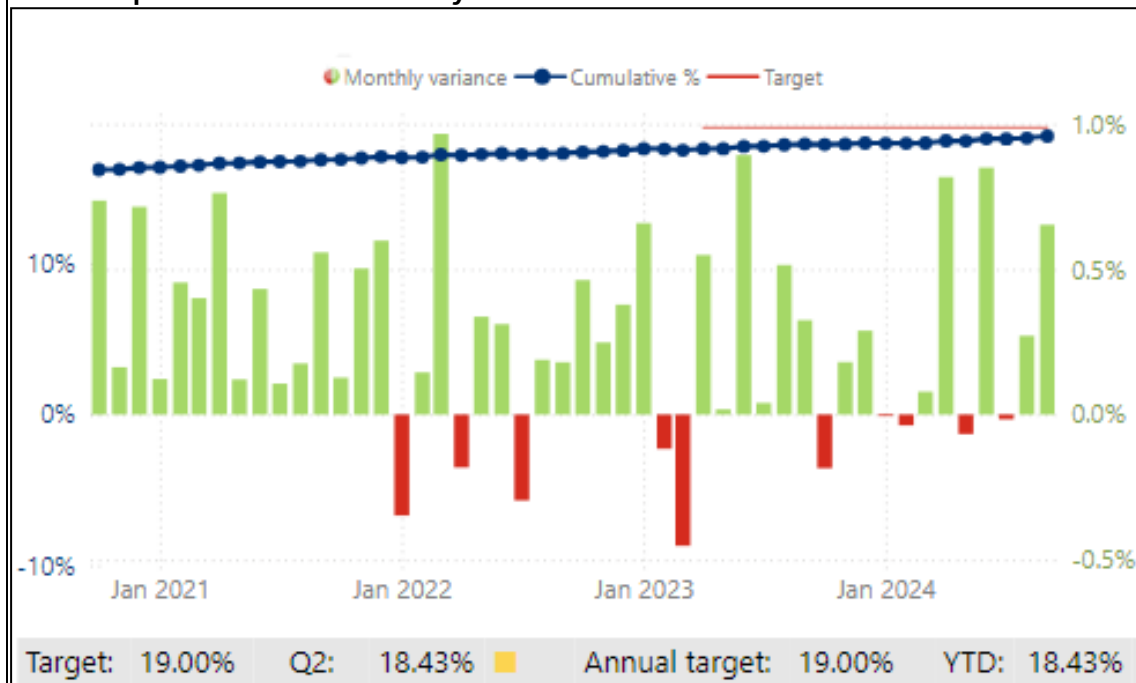
- Delivering excellence through inclusion

Charts setting out how the LFB has been performing against its Equality workforce objectives are set out below.

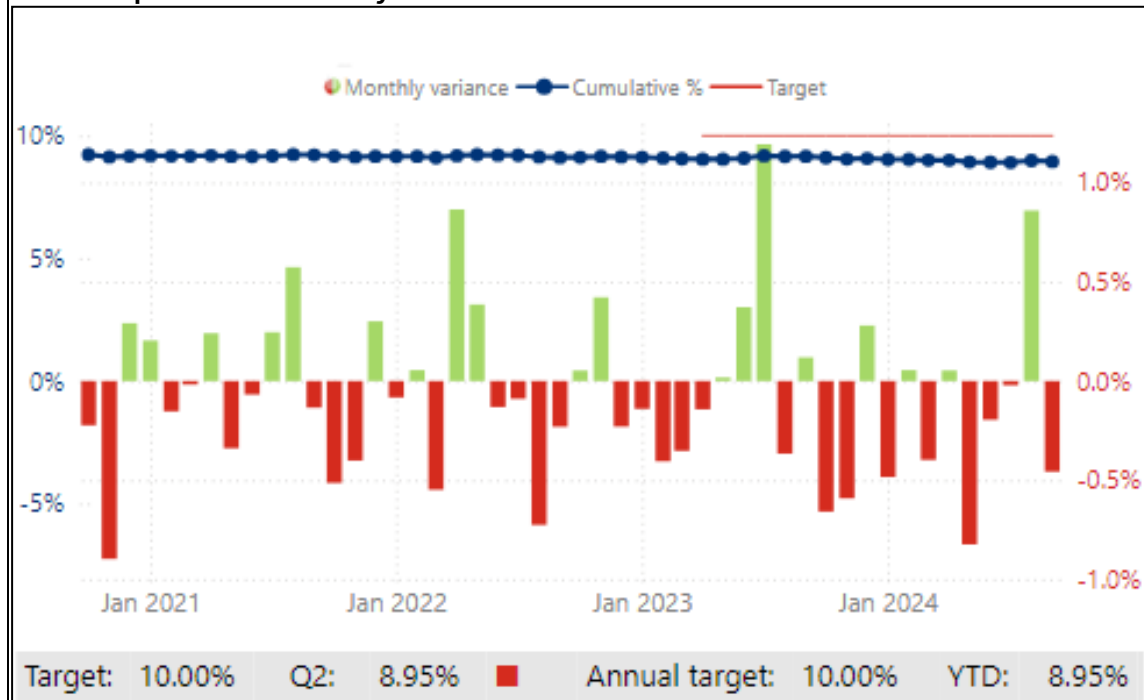
#### Staff composition – Gender (Women)



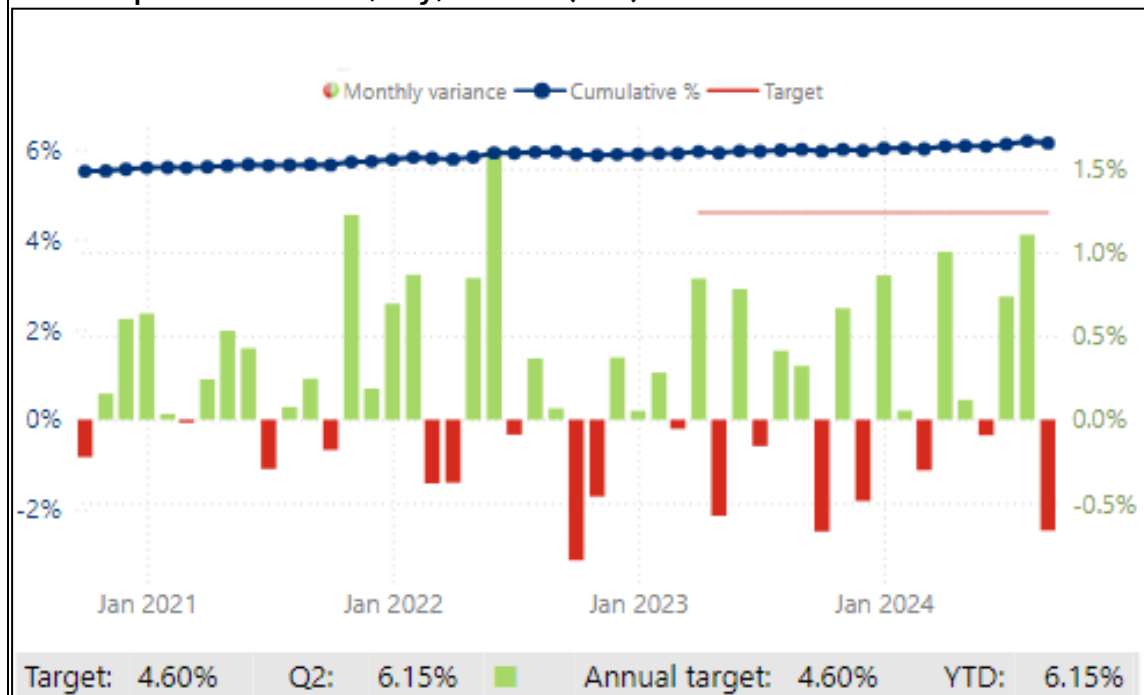
#### Staff composition – Ethnic Minority Staff



### Staff composition – Disability



### Staff composition – Lesbian, Gay, Bisexual (LGB) Staff



### C. Person responsible for the programme/ activity

Name:

Job title: Principal Budget Planning Accountant

Department: Finance

## D. Equality and diversity considerations

Describe the ways in which the groups below may be impacted by your activity. There are some example questions below to aid your thinking (delete any that are not relevant):

This budget submission sets out the financial implications of a range of saving and investment proposals, as well as a Financial Review implementation process to deliver additional savings in 2025-26 and future years. Work will continue to implement these proposals and updated EIA will be provided for any change proposals as required or for any new savings and efficiencies identified. An EIA has been published for a set of reorganisations that will be in consultation until May 2025. This EIA will continue to be reviewed and updated through consultation and during the subsequent period of implementation.

Proposals were reviewed to ensure there will be no impact on our communities. We will also protect our frontline delivery and regulatory capabilities to ensure we remain trusted to serve and protect London.

**The purpose of an EIA is to give as much information as possible about potential equality impacts, risks or opportunities that your policy, activity or project may have on different groups of people.**

**This Equality Impact Assessment should demonstrate due regard for the provisions of the [Public Sector Equality Duty](#) by considering the following:**

1. identify possible negative impacts of decisions on individuals and groups with protected characteristics and plan mitigating action accordingly; and,
  2. identify additional opportunities to advance equality within policies, strategies, and services.
- Age (e.g. are there ways older or younger people may find it difficult to engage in your project or process, are there young/old people who need support)
  - Disability/Barriers (do you need to consider large print or easy read of any surveys/questionnaires?)
  - Race (including ethnicity and nationality) (does your project consider the needs of people from different groups, if not do you need to make any adjustments?)
  - Religion or belief (do people from faith groups experience any specific disadvantage in relation to your research project)
  - Gender
  - Sexual orientation (is your language inclusive of LGBT+ groups?)
  - Trans and non-binary – is your language inclusive of trans and non-binary people?
  - People experiencing multiple needs such as homelessness, mental health problems, being involved in the criminal justice system or substance misuse.
  - Pregnancy and maternity
  - Social deprivation- e.g. people who may be prohibited from attending events due to the cost of travel, people who live in deprived areas and homes which may be at risk, responsibility of the council (if the activity is in the community)

Consultation will be ongoing with RBs, ESGs and Belonging, Inclusion and Wellbeing team. Individual meetings with impacted staff members are being held and these will consider individual circumstances. Overall, we will continue to assess the possible negative impacts on individuals or groups with protected characteristics set out above.

Relevant information has been sourced from People Services and has been used to assess potential impacts on specific groups of people and what mitigations will be put in place.

## E. Evidencing Impact

Please answer each of the following questions

**What information have you used to understand all people who will be involved in or affected by your programme/ activity? (e.g. if your activity refers to all employees, how did you learn about what they need and think, especially those with protected characteristics – did you ask directly? Did you generalise based on wider research, did you consult, if so, how many and when and what did they tell you, or what did you learn?)**

Consultation will occur throughout the budget savings realisation process for any of those people directly who are impacted. The EIA for the reorganisation proposals will be reviewed as the consultation progresses and the impact on groups and individuals becomes clearer.

Further to this, a mitigation action plan was developed to help address any issues prior to the commencement of consultation..

**Explain any gaps in evidence/ insufficient information to properly assess the impact of your programme/ activity, and how will this be addressed? e.g. further research or working with a voluntary sector organisation?**

The EIA is part of an iterative process and will be used at different stages of the consultation, including before any of the proposals are finally implemented.

**Explain whether your programme/ activity disproportionately affects any group named above?**

Impact assessments are living documents and will continually be updated to reflect the dynamic nature of staff impacts. Where potential adverse impacts on particular groups are identified, engagement and consultation will continue with trade unions, equality support groups and the Inclusion & Wellbeing Team to determine mitigating actions.

Any savings put forward have been considered in terms of the impact on the communities to which we serve, and specifically to avoid any adverse impacts.

**Describe whether this programme/ activity may potentially lead to discrimination (direct or indirect), harassment, victimisation, or less favourable treatment of people with protected characteristics?**

All managers are reminded of their duty of care and responsibilities under the Public Sector Equality Duty, including through compulsory training.

**Describe whether your programme/ activity contribute to advancing equality of opportunity?<sup>1</sup>**

Investment opportunities and growth within certain departments will be undertaken using fair recruitment practices, ensuring the needs of groups with protected characteristics are considered and, for example, any flexible arrangements sought where required.

**Describes where there an opportunity for your programme/ activity to foster good relations between groups?**

Various stakeholders, such as trade unions and the ESGs, are being consulted on the range of proposals contained within the budget report including in relation to pay and skills payments) and the



potential positive impacts and opportunities available alongside putting in mitigating factors as far as possible to minimise the impact on any individuals or group. Such actions may include; assimilation or re-deployment.

**Identify any reasonable adjustments to your programme/ activity to avoid discrimination or advance equality of opportunity?**

Those impacted heavily through any of the proposals in the budget report will be contacted and consulted with, through best endeavours on LFB's part, as part of the process if on, for example, long terms sickness or maternity/paternity leave. We will take care to balance the need for a consultation which is both meaningful and conducted in a timely fashion against people's individual circumstance.

**How is the programme/ activity's communication made accessible to all groups?**

The budget report is available online, circulated to key stakeholder groups such as the Industrial Relations Team and Trade Union Groups.

**How are you engaging people with a wide range of protected characteristics in the design, implementation and monitoring of the programme/ activity?**

The proposals within this report were included as part of the LFC's Budget Submission to the Mayor and consulted on as part of the GLA's consolidated consultation budget for 2025-26. A separate EIA has been prepared and published on the collective consultation of organisational change that is necessary to deliver a balanced budget.

**Appendix 6**  
**Capital Strategy**  
**The capital programme and the capital strategy**

**LFC Capital Strategy 2025-26 and beyond**

**Description**

Capital is defined as all expenditure not directly included in the annual revenue budget (General Fund) and generally results in a new or enhanced asset or investment held on the London Fire Commissioner's (LFC) balance sheet.

All capital expenditure must comply with the Capital Strategy. The Capital Strategy brings together detailed policies, procedures and plans relating to existing land and building related assets and treasury management transactions and applies to the General Fund.

The Capital Strategy forms an essential part of the LFC's integrated revenue, capital, and balance sheet planning. It aligns to the Medium-Term Financial Plan (MTFP), and the Annual Revenue Budget.

The Capital Strategy also provides a framework by which capital expenditure decisions are made as required by the CIPFA Prudential Code for Capital Finance in Local Authorities and LFC to provide good governance.

The Capital Strategy is prepared in the new year, in advance of the financial year to which it pertains. It is separate from the capital programme, which sets out what we plan to do, whereas the capital strategy sets out how and why we will do it. This Appendix sets out to summarise the capital programme as it currently stands and indicates the likely direction the capital strategy will take.

It should also be noted that whilst this is a report on capital, it also applies to all expenditure of a revenue nature relating to land and buildings, such as asset maintenance and planned asset development programmes, where significant revenue expenditure is incurred in the revenue budgets.

**Intention**

1. The Capital Strategy will be developed in accordance with the CIPFA Prudential Code (2021 edition) to ensure that all amounts borrowed by London Fire Commissioner's (LFC) are affordable. The Capital Strategy will outline the LFC's approach to capital investment decisions and priorities, ensuring that it is in line with corporate priorities. These priorities are set out in the Community Risk Management Plan (CRMP) which came into effect on 1 January 2023.
2. The Capital Strategy supports the Brigade and it is intended to give a high level overview of how the capital expenditure and capital financing contribute to delivery of services and its purpose as an organisation trusted to serve and protect London, and delivery of the Mayor's priorities.
3. The LFC Capital Strategy and capital programme together cover a more detailed outlook set over a five-year timeframe. The Strategy does however include a longer-term vision, a forward look at those projects that are likely to run beyond the five-year strategy and programme period or be initiated subsequently. This covers a timeframe for the 15 years from 2029/30 to 2043/44. The Capital Strategy is written to comply with the Prudential and Treasury Management Codes issued by the Chartered Institute of Public Finance and Accountancy (CIPFA).
4. The Capital Strategy will set out a framework for the management of capital finance and, along with the LFC Treasury Management Strategy (published in the same reporting cycle), will cover the following areas:
  - a. Capital Expenditure and Investment Plans;
  - b. Prudential Indicators;
  - c. External Debt; and
  - d. Treasury Management.

5. The Capital Strategy will address the requirements of the Chartered Institute of Public Finance and Accountancy (CIPFA) Prudential Code, which sets out a requirement for local authorities to produce a Capital Strategy to form part of its integrated revenue, capital and balance sheet planning. It is updated annually to react to the changing LFC priorities, social and demographic changes and the financial climate.
6. This report constitutes an indication of the expected tone and content of the Capital Strategy, based on the current capital strategy and the known content of the capital programme, together with approved growth bids. The Capital Strategy was published in draft as part of the budget submission to the Mayor in November 2024, and as a final Capital Strategy following approval by the LFC in March 2025.

## **Benefits**

This outline Capital Strategy demonstrates that the LFC takes capital expenditure and investment decisions in line with service objectives, and properly takes account of stewardship, value for money, prudence, sustainability, risk and affordability.

The key benefits of the outline Capital Strategy are to deliver a capital programme that;

- a. ensures the LFC's capital assets are used to support the delivery of services according to the priorities within the London Safety Plan and the Community Risk Management Plan;
- b. links to the LFC's asset management plans (e.g. for estates and fleet) and other LFC Strategies/Plans, such as the sustainable development strategy;
- c. is affordable, financially prudent and sustainable;
- d. ensures the most cost-effective use is made of the existing assets and new capital expenditure; and
- e. supports delivery of the Mayoral policies and objectives.

## **Approach**

The outline Capital Strategy has been derived largely from plans for estates, fleet, ICT and Sustainable Development, in the context of the CRMP and the Treasury Management Strategy. It has been developed to reflect the LFC's priorities and will be reviewed for future years to deliver against the CRMP. It will also support addressing the recommendations from the Grenfell Tower Inquiry and the HM Inspectorate of Constabulary and Fire & Rescue Services.

The Estates Strategy seeks to align the asset portfolio to best support service delivery by the Brigade. It reflects the requirements of the CRMP, the review undertaken by Anthony Mayer into the Brigade's resources, the terror preparedness review undertaken by Lord Harris, the LFC's inclusion strategy, and the Mayor's Homes for Londoners agenda. A condition survey has been undertaken for all LFC properties, and the current condition and functional suitability of the property has been assessed against the LFC's requirements for a modern fire service.

The ICT Strategy seeks to ensure that the technologies available to the Brigade, via a range of ICT solutions, are fit for purpose, affordable and sustainable, that they are responsive to business need and valued by staff and stakeholders and are delivered in a cost effective and efficient way, including collaboratively where appropriate.

The Fleet Replacement Plan will meet the Brigade's fleet requirements over the coming years and address the fleet commitments made under the Mayor's London Environment Strategy (LES). This requires LFC to achieve the following targets:

- a. all cars in support fleets to be zero emission capable by 2025;
- b. all new cars and vans (less than 3.5 tonnes), including response vehicles, being zero emission capable from 2025;
- c. all heavy vehicles (greater than 3.5 tonnes) to be fossil fuel-free from 2030.

The Sustainable Development Strategy sets out ten objectives to achieve the Brigade's vision of being the leaders on sustainable development within the UK Fire and Rescue Service. The three main focus areas of this strategy are environment and climate change; economic value; and equality and inclusion.

The Treasury Management Strategy sets out the treasury management arrangements in place to manage the LFC's borrowing and cash balances and deliver best practice. It covers the management of LFC's investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks. This is delivered as part of the London Treasury Liquidity Fund LP.

### **Influences**

The main influences on the Capital Strategy are set out below.

- The age of the estate - about a third of fire stations are over 60 years old and nearly a third are listed, locally listed and/or are in a conservation area.
- The layout and design of the majority of fire stations creates challenges in meeting the needs of a modern service.
- Changing operational requirements – developing response to changes in the type of incidents, including terrorism related, and fire safety particularly in the post Grenfell period.
- Population growth and locating resources to address developing needs
- New fleet requirements due to the changing needs of the service and the new ultra-low emission zone.
- Current shortage of availability for zero emission capable HGVs and new technology regarding electric/hybrid vehicles.
- The shortage of affordable new sites for new or re-located fire stations, together with the aim to ensure that future developments take account of both the Mayor's Homes for Londoners agenda and local planning policies.
- Fire stations operating 24/7 making major refurbishments/extensions difficult to undertake as operational cover has to be maintained. This is coupled with a lack of suitable/affordable sites for fire stations to operate from on a temporary basis whilst the works are undertaken.
- Ensuring that opportunities to benefit from developments in technology are maximised, including the ability to provide positive changes in the delivery of services such as cloud computing.
- The reduction in the level of funding from capital receipts and grants and the ongoing affordability of funding capital expenditure through borrowing.

### **Mayoral Policies**

The outline Capital Strategy strives to address Mayoral policies as follows.

#### **Ensuring London is:**

- a. A city that meets the challenges of economic and population growth in ways that ensure a sustainable, good and improving quality of life and sufficient high-quality homes and neighbourhoods for all Londoners and help tackle the huge issue of deprivation and inequality among Londoners, including inequality in health outcomes.

The outline Capital Strategy will support this policy as follows.

- To ensure that our fire stations are well placed to meet the needs of Londoners, attending incidents effectively and to the attendance standards set.
- Looking to open up fire stations so that they become community assets/hubs. Ensure that the design of new fire stations will enable them to be community hubs.
- Identifying potential opportunities that the estates can offer to provide accommodation to further our prevention priorities with local authorities e.g. the health agenda and crime prevention (cadet training).

- To contribute to the Mayor's Homes for Londoner's agenda so that where LFC land can be released for development, the requirements for affordable housing are considered.
- b. A city that becomes a world leader in improving the environment locally and globally, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively.

The outline Capital Strategy will support this policy as follows:

- Upgrading our fleet to meet the Ultra-Low Emission Zone requirements and to assess and adopt new technologies as and when they become available.
- Aligning our estates strategy with other emergency services and using every opportunity to share buildings through co-location and integrating estate services.
- To improve the energy efficiency of our estates and to continue to take steps to reduce our carbon footprint through sustainable development.
- To continue to unlock the potential latent value in our estate, through engaging private sector developer partnerships on appropriate sites.

## 20-year Capital Ambition

The 20-year capital requirements are considered below, including investment and capital funding. This is based on the LFC's current capital programme plus the on-going future capital requirements and maintain operational effectiveness at current levels. A key review of the Capital Strategy and 20-year capital requirement has been to align these with the CRMP.

The LFC capital spending plans for the five years to 2028-29 are approved as part of the budget process and are funded with capital financing costs reflected in the revenue budget. The is set out in the table 1 below.

Table 1: Capital budgets and financing 2024-25 to 2028-29

Project	2024-25	2025-26	2026-27	2027-28	2028-29	TOTAL
	£m	£m	£m	£m	£m	£m
<b>Capital Schemes</b>						
Properties	22.2	41.7	46.0	64.5	34.1	208.5
Fleet Replacement Plan	1.4	1.7	6.6	5.2	10.5	25.4
ICT Projects	4.2	11.8	10.6	3.5	2.5	32.6
Communications Project	0.1	0.3	0.3	0.0	0.0	0.7
Operational Policy Equipment	0.1	0.7	0.0	0.0	0.0	0.8
Optimism Bias (10 per cent)	(2.8)	(5.6)	(6.4)	(7.3)	(4.7)	(26.8)
<b>Total Expenditure</b>	<b>25.2</b>	<b>50.6</b>	<b>57.1</b>	<b>65.9</b>	<b>42.4</b>	<b>241.2</b>
<b>Capital Financing</b>						
Revenue Contributions	0.3	0.0	0.0	0.0	0.0	0.3
Capital Receipts	0.0	0.0	0.0	0.0	0.0	0.0
Capital Grants	1.7	0.6	0.2	0.0	0.0	2.5
External Borrowing*	23.2	50.0	56.9	65.9	42.4	238.4
<b>TOTAL Funded Financing</b>	<b>25.2</b>	<b>50.6</b>	<b>57.1</b>	<b>65.9</b>	<b>42.4</b>	<b>241.2</b>

\*Borrowing is currently shown as external but it is expected that some of the borrowing will be using internal funds.

The proposed increase in property-related capital expenditure over the coming years is partly due to further investment in the 'Privacy for All' project but in large part due to the planned investment in a new LFB Headquarters on Brigade-owned estate, subject to business case assessment of the value for money case for this against alternatives including rental options.

## Revenue Funding of the Capital Programme for the first 5 years

In the medium-term the total capital plan is £241.2 million of which £2.0 million of the plan is funded by the use of Revenue Contributions and Capital Grants. The remaining balance is expected to be funded by £238.4

million of borrowing. There is a requirement in accordance with the Prudential Code for LFB to set aside sufficient funds to fund the Capital programme should the need arise.

Within the interest charges, this is calculated on the basis of the current PWLB loan interest which stands at 5.08 per cent (5 year re-payment on maturity loan, also assuming the certainty discount rate applies). From 2027-28 onwards the interest rate assumptions are of a borrowing rate of 2.5 per cent.

A further 15 years, from 2028-29 to 2042-43 to complete the 20-year capital ambition has been prepared on the basis of maintaining the asset base at its current level, with updates/replacements as necessary. The further element has some funding identified, however there is a funding gap to be addressed. The element of the capital spending plans is set out in table 2 below and is inclusive of 3 per cent per annum inflationary cost pressures.

Table 2: Capital Ambition 2028-29 to 2043-44 and Ambition Gap

Project	Years 2029- 2034	Years 2034- 2039	Years 2039- 2044	Total
	£m	£m	£m	
<b>Capital Schemes</b>				
Properties	76.0	85.0	97.0	<b>258.0</b>
Fleet Replacement Plan	53.0	24.0	40.0	<b>117.0</b>
ICT Projects	41.0	20.0	25.0	<b>86.0</b>
<b>Total Capital Expenditure</b>	<b>171.0</b>	<b>129.0</b>	<b>162.0</b>	<b>461.0</b>
<b>Capital Financing</b>				
Capital Receipts	0.0	0.0	0.0	<b>0.0</b>
Capital Grants	0.0	0.0	0.0	<b>0.0</b>
External Borrowing	171.0	129.0	162.0	<b>461.0</b>
<b>TOTAL Funded Financing</b>	<b>171.0</b>	<b>129.0</b>	<b>162.0</b>	<b>461.0</b>
<b>Unfunded Capital Expenditure</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

The programme includes the capital investment requirements to ensure that the LFC's fleet meets the new ultra-low emissions zone requirements (ULEZ) and replacement of vehicles as they come to the end of their useful life. Ongoing capital expenditure on the LFC's estate is included to maintain the condition and functionality of fire stations. There are also estimates for spend on ICT replacement and upgrade. The programme does not include the full additional costs in respect of the works to the LFC estate to enable the LFC fleet to be zero emission compliance by 2030 as it is not possible to predict the impact of the level of additional infrastructure required at this time. The capital requirement for the LFC estate has been based on analysis that has been undertaken which assesses the condition and functional suitability for all existing fire stations.

The Ultra Low Emission Fleet (ULEF) Programme sets out the steps to be taken to plan, develop, test, procure and deploy new vehicle technologies within the LFC fleet to achieve the targets set out above. It focuses on the process for heavy frontline vehicles, given the current lack of low/zero emission capable HGVs and the technological challenges in developing them.

Government advocates a 'cloud first' approach when considering options for new ICT systems and infrastructure improvements. With this the funding model shifts from capital to revenue-based expenditure, which presents challenges to LFC, due to the increasing pressure on revenue funding and budgets. At present the ICT Strategy does not plan a radical change to the ICT infrastructure in the short term as this would consume significant resources and generate risk in the transitional phase. Instead, a 'cloud' based approach to new systems will be adopted as and when current systems are being replaced which would allow the Brigade to explore new ways for ICT delivery, whilst minimising risk and disruption.

## Available Capital Funding

There is a variety of ways in which capital expenditure can be financed, but the main sources are often from a combination of revenue resources/reserves, capital grants, capital receipts and borrowing. A brief explanation for each of these options is described below.

- a. **Prudential Borrowing** - The LFC ensures that the level of borrowing is affordable, prudent, and cost effective. Borrowing is subject to the requirements of the Prudential Code and is managed through the Treasury Management Strategy. Borrowing has a long-term impact on the revenue budget, through the interest payable on the loan and the annual charge for the repayment of the sum borrowed (Minimum Revenue Provision (MRP)). Loans are sourced in discussion with the London Treasury Liquidity Fund LP and from the Public Works Loan Board (PWLb).
- b. **External Capital Grants** - Grants are awarded to the LFC from Central Government and other third parties. Most grants are now policy specific and in some cases are awarded through a bidding process. The LFC bids for grant funding as and when opportunities arise.
- c. **Capital Receipts** - The LFC is able to generate capital receipts through the sale of surplus assets. This is a limited resource as the majority of the LFC's assets are currently in operational use as part of front-line service delivery and response. The timing and value of the capital receipts may also be further delayed or reduced due to planning requirements and changes in market conditions.

The LFC aim, wherever possible, is that all large developments are self-funding through the release of land/buildings for sale and the opportunity of sale and leaseback arrangements.

**Revenue Funding** - LFC can use revenue resources to fund capital projects on a direct basis, however, current funding projections point to a revenue budget gap which means that the capacity for this is very limited. Invest to save projects that result in additional revenue savings in future years are the best option for funding by this method.

The LFC's level of borrowing is forecast to increase as the availability of capital receipts come to an end, and expenditure increases, such as on fleet with the LFC now owning its fire appliances, etc., resulting in additional revenue costs through MRP and the interest charged on outstanding loans. It is expected that the Capital Strategy will be entirely reliant on borrowing over the medium-term, depending on the timing of the remaining capital grants, with the additional capital financing costs adding to the pressure on the revenue budget. The table below summarises capital expenditure and debt charges (loan interest and annual MRP change) compared to the estimated debt charges budget from 2026-27 onwards. The future debt charge budgets have been based on the 2026-27 budget and increased by RPI estimated at 3 per cent per annum. Maturing loans and the associated MRP charges reductions have been considered, to show the budget requirement and resulting budget pressure each year in the calculation of the required level of debt charges.

Based on current estimates, the level of debt charges is expected to steadily increase over the period, resulting in a substantial increase in debt charges peaking at £39.0 million by 2038/39 before starting to fall. Under current assumptions this would result in the need to increase the capital charges budget by an average of £20 million, which would need to be funded by matching savings or income.

The projected budget pressure, of an average of £20 million, is based on current capital spend projections which is based on inflation at 3.0 per cent per annum and the current capital plan assumptions of total expenditure and the expectation of no significant capital receipts. This figure will change with the following risk items.

- The level and timing of capital receipts.
- The potential of future interest rate rises.
- The availability of resources to deliver the capital programme.

The level of capital spend is largely driven by the need to maintain and replace the fleet, fire stations and ICT that support the current level of service delivery and front-line response. It is therefore difficult to reduce spend without changes to front line service delivery.

### Options to bridge funding gap

The LFC will need to consider options on how to bridge the funding gap and ensure that future years capital expenditure is affordable. Possible options to consider are provided below.

- Provide a revenue contribution to fund the capital programme (unlikely in the short term given budgetary pressures).
- Pursue possible alternative funding/service delivery options.
- Reduce the level of the capital programme.
- Secure additional resources – GLA/Government.

### External Debt

The table below sets out the prudential limits for 2024-25 to 2027-28. These will be reviewed as the new Treasury Management Strategy is developed.

Table 3: Prudential Limits

Approved Borrowing Levels	2024-25 £m	2025-26 £m	2026-27 £m	2027-28 £m
Operational Boundary	240.0	240.0	240.0	240.0
Authorised Boundary	245.0	245.0	245.0	245.0

### Other Long-Term Liabilities

LFC has other long-term liabilities which include PFI contracts for fire stations (until 2040/41) and a finance lease for the Merton Control Centre (Until 2034/35). The current and forecast outstanding long-term liabilities are as follows.

Table 4: Other Long-Term Liabilities

As at 31 March	2024	2025	2026	2027	2028	2033	2038	2043
	£m	£m	£m	£m	£m	£m	£m	£m
PFI	39.9	38.3	36.7	35.1	33.6	26.4	13.6	0.0
Finance Lease	18.4	18.4	18.3	17.3	16.2	9.4	0.0	0.0
<b>Total</b>	<b>58.3</b>	<b>56.8</b>	<b>55.0</b>	<b>52.5</b>	<b>49.8</b>	<b>35.8</b>	<b>13.6</b>	<b>0.0</b>

There are no plans for any future finance leases/PFI arrangements at the current time. The contract register is regularly reviewed to ensure that no finance leases have been entered into without the Finance Department's knowledge. This is also further managed by the Assistant Director - Finance reviewing all reports to LFC to include financial implications.

The above table does not consider the effects of implementing the new accounting standard IFRS16, where all leases/contracts that conveys the right to use an asset will be brought onto the balance sheet and long-term liabilities will be created for the future rentals under these leases. The new accounting standard came into effect from 1<sup>st</sup> April 2024. This is likely to increase significantly the value of lease arrangements held on the balance sheet, and therefore notional levels of debt. The Capital Strategy will be updated once the impact of the new accounting requirements has been assessed.

### Risk

The Capital Programme is subject to the following risks.

- A lack of affordable sites for new developments.
- Increased cost in delivering the capital programme due to inflation pressures/post-Brexit/ limited number of suppliers that can provide specialist equipment/vehicles.



- The potential requirement to fund the replacement of National New Dimensions Assets which currently has not been factored in the capital requirements.
- Additional building costs required to support the delivery of Zero Emission Pumping Appliances (ZEPA).
- Difficulty in obtaining planning consent for new developments and refurbishments.
- Third party collaboration and contractor capacity to deliver, as all capital projects will require varying collaboration with external parties over the project life.
- The risk that the planned capital disposals will not realise the projected capital receipts income or may not come to fruition thus resulting in additional borrowing costs.
- Additional revenue budget pressures resulting from increased revenue impact of borrowing.
- Interest rate increases for borrowing.
- Changes in government funding, policy and legislation.
- Availability and speed of developments in technology.
- Recruitment and retention of key skilled staff and significant staff resource to deliver the capital schemes.

The risks are being managed by as follows.

- Maximising, where possible, the redevelopment of existing sites through developers to reduce capital borrowing and to realise any potential capital receipts released through latent estate value.
- Investing in invest to save projects where the outcome of these projects will result in revenue savings to LFC.
- Ensuring the capital governance framework, including regular monitoring and review of the capital programme, is in place.
- Ensuring that all planning applications consider all relevant local/Mayoral planning and listed building requirements. Pre-discuss all planning applications prior to submission with the local planning officers to mitigate against planning refusals and completing public consultation in good time for those development projects that affect the public.
- Re-allocating key resources to development projects as required to meet the capital programme.
- Promoting collaboration with other emergency services and the GLA Group.
- Limit the risk of contract failure by effectively managing contracts and learning from past lessons in project delivery.
- The ability to flex the capital programme and re-phase capital expenditure so as not to result in additional external borrowing and the resulting increase in debt charges.

### **Appraisal - Governance and Monitoring**

An important part of the governance arrangements is the frequent monitoring of the agreed capital programme. The capital programme is reviewed regularly with budget holders and reported on a quarterly to senior management. The capital monitoring is reported alongside revenue monitoring in the quarterly financial position report, which is reported to the Investment & Finance Board and Commissioner's Board. Quarterly monitoring reports are also presented to the Fire Board and are published. The published reports are used to support scrutiny by the London Assembly's Fire Committee and Budget and Performance Committees (BPC).

New, or changes to existing capital projects are dealt with as part of the capital monitoring process and budget holders are required to submit a request outlining the key scheme information, costs both capital and revenue and associated risks.

Where a new scheme or a budget change is required which is greater than £150k, a separate report is prepared, and additional governance arrangements are in place. The reports are considered by the Investment & Finance Board and Commissioner's Board, and the Deputy Mayor through the Fire Board, as required, before final approval by the London Fire Commissioner.

The Capital Programme is approved by the London Fire Commissioner before submission to the Mayor as part of the annual budget submission.

When proposing capital projects for inclusion into the programme, the responsible department will undertake an assessment/evaluation as to how the project:

- Ensures LFC's capital assets are used to support the delivery of services according to the priorities within the CRMP.
- Links to LFC's asset management plans (e.g. estates and fleet) and other LFC Strategies/Plans.
- Is affordable, financially prudent and sustainable.
- Ensures the most cost effective use is made of the existing assets and new capital expenditure.
- Supports the Mayor of London in meeting the approved objectives and strategic plans.

The LFC has overall responsibility for the Capital Strategy, with support from senior management with the strategic development and monitoring of the capital programme through Commissioner's Board and Investment & Finance Board. The Capital Strategy is also subject to consultation with the Deputy Mayor, and submission to the Mayor as part of the budget submission. Wherever appropriate to do so, and more specifically for the larger projects, project boards are established, which consist of a wide range of professional expertise. These boards meet regularly to assess and monitor the progress of the projects to ensure the delivery of the defined capital investment.

This outline Capital Strategy will be continually refined and assessed against deliverability, affordability and risk in addition to ensuring this delivers the CRMP.

#### **Chief Finance Officer Sign Off**

The Chief Finance Officer is to report explicitly on the deliverability, affordability and risk associated with the Capital Strategy. A report presenting the Strategy will be presented to the Commissioner's Board, and the Deputy Mayor's Fire Board, alongside reports for approval of the Budget and Treasury Management Strategy.

# Statement of Assurance 2023/24

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**Report to:**

Performance, Risk and Assurance Board .....	12 September 2024
Audit Committee .....	16 September 2024
Commissioner's Board .....	9 October 2024
Deputy Mayor's Fire Board.....	26 November 2024

**Date:**

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**Report by:**

Kevin Lendor, Head of Business Assurance, Transformation Directorate

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**Report classification:**

For decision

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**For publication**

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**Values met**

Service  
Integrity  
Teamwork  
Equity  
Courage  
Learning

# PART ONE

## Non-confidential facts and advice to the decision-maker

### Executive Summary

The London Fire Commissioner (LFC) is required to prepare an annual Statement of Assurance in accordance with the Fire and Rescue National Framework for England. This report presents the LFC's statement for 2023/24.

#### **Proposed decision – For the Deputy Mayor**

That the Deputy Mayor for Planning, Regeneration and the Fire Service has considered the attached report prior to the London Fire Commissioner approving this statement as the LFC's Statement of Assurance for 2023/24.

#### **Proposed decision – the London Fire Commissioner**

That the London Fire Commissioner approves the attached statement of assurance (and accompanying information) and agrees that the proposed final Statement of Assurance be sent to the Deputy Mayor for consultation prior to seeking the Mayor's approval to provide it to the Assembly for consideration.

## 1 Introduction and background

- 1.1 The LFC is required to prepare an annual Statement of Assurance (SoA) in accordance with the Fire and Rescue National Framework for England. The LFC is required to provide annual assurance on financial, governance and operational matters.
- 1.2 The Statement of Assurance (SOA) for 2023/24 is attached as Appendix 1 to this report. Prior versions of the SOA included a report on borough and ward data performance, this has been removed for the 2023/24 statement as this data is now being reported elsewhere as sign-posted in the statement.
- 1.3 As part of the 'open data' produced by the LFB to meet its transparency ambitions, we publish data for the speed of our emergency response to every 999 incident we attend ([London Fire Brigade Incident Records - London Datastore](#)). This dataset is more granular than the Ward level data previously appended to the SoA.
- 1.4 The focus of the Statement submitted for approval is the financial year 1 April 2023 to 31 March 2024.

## 2 Objectives and expected outcomes

- 2.1** This report presents the London Fire Brigade's (LFB) Statement of Assurance for 2023/24. Following the governance process and review and comment by the scheduled Boards and Committees who have a dedicated scrutiny role in the production of the Statement, it is recommended that this be approved as the Brigade's official statement for the 2023/2024 financial year.

## 3 Values Comments

- 3.1** The LFC notes the Fire Standards Board requirements around adopting and embedding the Core Code of Ethics at an individual and corporate level. Following extensive engagement, the LFC has introduced LFB values which build on and do not detract from the Code of Ethics.

- 3.2** The LFB values are:

- Service: we put the public first
- Integrity: we act with honesty
- Teamwork: we work together and include everyone
- Equity: we treat everyone fairly according to their needs
- Courage: we step up to the challenge
- Learning: we listen so that we can improve

- 3.3** This report is part of delivering all of the LFB values:

- Service: This report provides up to date information on all our assurance activity which holds us accountable and drives the improvement of our service quality and delivery.
- Integrity: This report is key to our organisational integrity by providing a transparent yearly update on our assurance activities.
- Teamwork: This report aims to highlight key assurance activity across the organisation with a view to collaborating with key stakeholders on how to continually improve.
- Equity: This report contains information on assurance activities which support the equity of the service we provide.
- Courage: This report provides information that helps the LFB to tackle key issues.
- Learning: This report ensures we are continuously assessing our assurance activity and being held to account by our valued stakeholders, with the aim to continuously improve.

## 4 Equality Comments

- 4.1** The LFC and the Deputy Mayor for Planning, Regeneration and the Fire Service 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.

- 4.2** 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.
- 4.3** 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.
- 4.4** 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.
- 4.5** 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.
- 4.6** 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.
- 4.7** 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.

## **5 Other considerations**

### **Workforce comments**

- 5.1** The Statement includes matters which have been the subject of consultation with the Representative Bodies but no specific consultation has been undertaken on this report.

## **Sustainability comments**

- 5.2** Sustainability forms part of the assurance gathering processes which support the production of the statement.
- 5.3** The LFB has in place an Environmental Management System certified to ISO 14001 that covers the management functions of the organisation and a sample of 10 fire stations. This assures the processes in place to monitor compliance with all relevant environmental legislation and continual improvement against environmental impacts.
- 5.4** Governance processes require sustainable development impact assessments of all new or amended policies and corporate projects.
- 5.5** Governance processes are in place to monitor our procurement activity for compliance with the Public Services (Social Value) Act 2012 and that of our supply chain for their statutory responsibilities such as modern slavery.

## **Procurement comments**

- 5.6** There are no procurement implications as a result of this report.

## **Communications comments**

- 5.7** The Statement of Assurance requires input from across the LFB to compile. In addition to the Statement contributors, a draft of this report has been circulated to all Directors and all impacted departments via Heads of Service for information, comment, and review. Pending agreement by the Mayor, and following consultation with the Deputy Mayor for Planning, Regeneration and the Fire Service and Fire Committee, it is intended that this report should be published and be publicly available as the LFC's Statement of Assurance for 2023/24.

## **6 Financial comments**

- 6.1** The Chief Finance Officer has reviewed this report and has no comments.

## **7 Legal Comments**

- 7.1** In accordance with Part 6A of the Greater London Authority Act 1999 the London Fire Commissioner (the "Commissioner") is established as a corporation sole with the Mayor appointing the occupant of that office. Under section 327D of the GLA Act 1999, 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.
- 7.2** Section 1 of the Fire and Rescue Services Act 2004 states that the Commissioner is the fire and rescue authority for Greater London.
- 7.3** By direction dated 21 March 2018 (the "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 Planning, Regeneration and the Fire Service (the "Deputy Mayor").

**7.4** The Direction sets out those matters for which the Commissioner would require the prior approval of either the Mayor or the Deputy Mayor, specifically the Mayor has set out the following requirements in regard to scrutiny of the Statement of Assurance:

1.1 The prior approval of the Mayor is required before any of the following decisions is taken:

- 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 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; ...

In this Direction: ...

"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.

#### *Fire and Rescue National Framework*

**7.5** When carrying out its functions, the Commissioner, as the fire and rescue authority for Greater London, is required to 'have regard to the Fire and Rescue National Framework (the "Framework") prepared by the Secretary of State (Fire and Rescue Services Act 2004, section 21).

**7.6** To have regard does not mean to follow slavishly, if the Commissioner wishes to depart from the framework, it may, but it must show a good reason to do so. The Courts have consistently suggested that Government guidance issued under statute, as is the case here, should be given 'great weight' and should be considered 'with great care, and from which it should depart only if it has cogent reasons for doing so.' The reasoning behind any decision to depart from the framework should also be 'spelled out clearly, logically and convincingly.'

**7.7** Paragraph 10.09 to 10.11 of LFB Board Paper, LFC0742 (under the legal comments section), sets out the requirements of the Framework and that the Commissioner may decide to depart from the Framework and proceed with the CRMP as drafted if the Commissioner has good reason for doing so having, such reasons being set out in report LFC0742.

**7.8** The Framework states that 'Every authority must publish an annual statement of assurance of compliance with the Framework '.

**7.9** The attached statement functions as the Commissioner's Statement of Assurance under the Framework.

#### *Greater London Authority Act 1999*

**7.10** Section 327G of the Greater London Authority Act 1999 (the "1999 Act") 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.

### *Summary*

**7.11** 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 Statement of Assurance:

- Commissioner prepares Statement of Assurance (Framework)
- Deputy Mayor is 'consulted as far as practicable' on the Statement of Assurance before sending to the Assembly (Direction para 3.1)
- Mayor's approval is required before sending the Statement of Assurance to the Assembly (Direction para 1.1),
- Assembly provided an opportunity to scrutinise the Statement of Assurance and prepare a report for the Mayor (1999 Act, s327G(3)(a)),
- Mayor must approve the Statement of Assurance prior to publication to the public (s327G(3)(b)),
- Commissioner publishes the approved Statement of Assurance to the public.

**7.12** The recommendation in this report will constitute the Commissioner's final proposed text of the Statement of Assurance for the purposes of sending it to the Assembly under section 327G (2) of the 1999 Act.

**7.13** 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.

**7.14** Upon receipt of the Mayor's approval, which may be withheld, the Statement of Assurance 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. Following consideration of any report produced by the Assembly the Mayor may then, at his discretion, approve the Statement of Assurance.

## List of appendices

Appendix	Title	Open or confidential*
1	Statement of Assurance 2023/24	Not protectively marked

### 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



# Statement of Assurance

## 1 April 2023 to 31 March 2024

The London Fire Commissioner is the fire and rescue authority for London and is head of the London Fire Brigade.



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## Foreword by the London Fire Commissioner

1. This was our first complete year of delivering Your London Fire Brigade, our Community Risk Management Plan (CRMP) for 2023-29. The CRMP is underpinned by a seven-year delivery plan and is managed across nine programmes. Localised services are shaped through Department Plans, Borough Risk Management Plans and Station Delivery Plans, supporting our response to the changing needs of London's communities. To ensure successful delivery and coherence, we have aligned the Brigade's resources to CRMP priorities and invested in a Portfolio Management function to oversee our programmes and projects.
2. Consequently, the Brigade's activities and major initiatives this year were all rooted in the CRMP. This included addressing recommendations arising from Phase 1 of the Grenfell Tower Inquiry (GTI). In March 2024, we became the first and, to date, only organisation to have completed all 29 recommendations specifically directed towards it by the Phase 1 report. As a result, our firefighters are now better trained, equipped and prepared to respond to fires in London.
3. The Independent Culture Review, published in November 2022, proved a vital lever for change and, as a result, good practice continued to be delivered and embedded over the past year. His Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) had also put the Brigade into enhanced monitoring known as 'Engage' in December 2022. The CRMP was central to our removal from 'Engage' in March 2024. It included a major programme of cultural improvement delivered by a dedicated programme team through significant investment. His Majesty's Inspectorate recognised that our new Professional Standards Unit, the first of its kind in a UK FRS, is underpinned by revised, simpler policies on discipline and grievance, building on earlier work with the external complaints service. The establishment of the Advisory Panel, chaired by Martin Forde KC has also been useful in scrutinising the progress of culture change in the Brigade.
4. Last December, we launched our new values: Service, Integrity, Courage, Teamwork, Learning, and Equity. These values have been rolled out to all watches and teams across the Brigade and were created through an extensive engagement programme. Thousands of points of data and feedback were reviewed, and hundreds of staff were involved in sharing their views and stories, and discussing what the Brigade looks like at its best, which helped to form our values. The Community Forum provided valuable input into this process. Senior leaders have been visiting teams and watches in the Brigade to discuss the values and how these relate to staff. This engagement is a continuous conversation to help fully embed the values in our day-to-day work.
5. We have remained a learning organisation. We completed a major incident review following the wildfires on London's outskirts caused by extreme weather and introduced new training and equipment as a result. The roll-out of the project to enhance our operational response to Marauding Terrorist Attacks (MTA) has been delivered, resulting in our firefighters being appropriately trained and equipped to respond to incidents of this nature.
6. Finally, last year we identified lithium-ion batteries as the capital's fastest-growing fire risk, with a 78% increase in e-bike fires in 2023 compared to the previous year. We launched the Brigade's high-profile *#ChargeSafe* campaign in response and are working hard to reach communities with our messages and drive policy changes to keep them safe.
7. Our vision is to be trusted to serve and protect London. To achieve this, we must meet and, where appropriate, exceed the standards set out by our regulators and understand and anticipate the risks that London faces today and into the future. Most importantly, we will continue to improve and evolve our services by working with partners, including within the Greater London Authority, and engaging our staff and communities. I continue to be very proud of the significant progress we have made along this journey and, above all else, the positive impact the changes have had on the safety and wellbeing of Londoners.

**Andy Roe KFSM, London Fire Commissioner**

## Introduction

8. The Fire and Rescue National Framework for England sets out a requirement for fire and rescue authorities to provide an annual Statement of Assurance.
9. The framework requires that the statement should outline the way in which the London Fire Commissioner (LFC) has had regard to this National Framework and the Community Risk Management Plan. It must also provide assurance to our community and to government on financial, governance and operational matters.
10. This Statement, alongside the LFB Annual Governance Statement and LFB Statement of Accounts, satisfies that requirement for the 2023/24 financial year.
11. The Brigade produces separate annual governance and accounting statements which go into these areas in more detail. Consequently, this report focuses initially on operational assurance, and also provides overviews of our governance and financial oversight arrangements.

## Legislative Framework

12. The National Framework outlines the requirements for fire and rescue authorities to provide assurance on operational matters.
13. Fire and rescue authorities operate within a clearly defined statutory and policy framework. The key documents defining operational responsibilities for London Fire Commissioner (LFC) are the:
  - a) Fire and Rescue Services Act 2004;
  - b) Civil Contingencies Act 2004;
  - c) Regulatory Reform (Fire Safety) Order 2005;
  - d) Fire and Rescue Services (Emergencies) (England) Order 2007;
  - e) Localism Act 2011;
  - f) Policing and Crime Act 2017; and
  - g) Fire and Rescue National Framework for England 2018.

## Assessment of Risk

14. The Fire and Rescue National Framework for England 2018 places a duty on all Fire and Rescue Services to "identify and assess the full range of foreseeable fire and rescue related risks their areas face". The LFC's Assessment of Risk (AoR) is our response to that requirement. It includes foreseeable risks to which the Brigade might be expected to respond and wider risks that may impact it in the longer term.
15. In our AoR, risk is assessed based on a combination of likelihood and consequence. The AoR includes the analysis of low likelihood, high consequence events through the inclusion of the London Risk Register and analysis of new and emerging risks. It is a layered document that assesses community concerns, local incident data, extraordinary risks, and future risks as independent layers. If new potential risks are identified that require assessment, these will be considered as part of our corporate risk governance process. The AoR provides a high-level overview which can be used to prioritise work and resources. The AoR informed the development of our 2023 –2029 Community Risk Management Plan (CRMP) and is reviewed annually as a CRMP commitment, or as significant new data becomes available between annual reviews. The AoR works alongside our corporate risk management process (see paragraphs 109 to 113).
16. The AoR is published on our external website. Our AOR for 2023 can be found here <https://www.london-fire.gov.uk/media/042pjgpy/lfc-23-068-assessment-of-risk-2023-signed-v2.pdf>.



## Community Risk Management Plan

17. The national framework also requires us to publish an Integrated Risk Management Plan (IRMP) known as the CRMP. The CRMP serves as our primary organisational strategy – including both statutory obligations and our strategic ambition and requires the approval of the Mayor before it is published.
18. In January 2023 we published our latest CRMP, called 'Your London Fire Brigade'. As well as including an assessment of all foreseeable fire and rescue related risks referenced above, the plan demonstrates how our six services (Prevention, Protection, Response, Prepare, Recover and Engage) are utilised to prevent fire and other incidents and mitigate the impact of identified risks and incidents on the community. It articulates what we will do to achieve our ambition of being trusted to serve and protect London by 2029. It was developed using feedback from the public and LFB staff, from His Majesty's Inspectorate of Constabulary and Fire and Rescue Services and from Phase One of the GTI. Details of the plan can be found here: <https://www.london-fire.gov.uk/about-us/your-london-fire-brigade-our-plan-for-2023-29/>
19. Our ambition for the six services is expressed through our service strategies, which also seek to address the risks as identified in the AoR. The service strategies are delivered through our Borough Risk Management Plans, Department and Station Delivery Plans. Each of these plans details specific local targets, risks, priorities, and improvements.
20. The eight commitments in our CRMP are delivered through the our Transformation Portfolio, which is structured as nine programmes. There is one programme per CRMP commitment and an additional programme to improve LFB's change capability.

## Performance outcomes in 2023/24

21. We publish performance data and commentary on the London Datastore as part of the Commissioner's quarterly CRMP Key Performance Indicator (KPI) performance report ([here](#)). 2023/24 saw the introduction of new KPIs aligned to our CRMP which launched in January 2023. At the end of the first year of the CRMP we met 17 out of 29 KPI targets.
22. Areas of particularly good performance included meeting our community satisfaction target, meeting all arrival time indicators (not just aggregated across the year but for each month), and meeting our target against station staff time spent on prevention activity. This was one of our new indicators which introduced a new way of measuring time spent on delivering service strategies rather than counting volume of separate activities.
23. Remaining challenges are largely around internal factors such as training and sickness management. These internal factors are important issues that have wider impacts, and we have put plans in place to work towards meeting these targets in 2024/25.
24. Some of the targets that we did not meet are particularly challenging and fall outside of our direct control due to external factors, particularly skills shortages. In response we have set up our own Fire Safety academy, are exploring external training provisions and are offering a range of non-cashable benefits.
25. These KPIs are scrutinised internally monthly at our Performance, Risk and Assurance Board and Commissioner's Board. In addition, they are monitored at the Deputy Mayor for London's Fire and Resilience Board, LFC Audit Committee and the London Assembly's Fire, Resilience and Emergency Planning Committee quarterly.



## Statement of Assurance 2023/24

### Operational competence

26. The LFC has a statutory duty to ensure that all operational staff are trained to undertake their roles effectively and safely. Training requirements for operational staff include several generic core risk critical skills that all staff must develop and maintain. These core skills are set out in a formal Brigade policy – 'Developing and maintaining operational professionalism' (DaMOP).
27. DaMOP provides for training across a range of core competencies relevant to role and rank – including station based, specialist roles, senior managers, and strategic officers. There are both theoretical and practical requirements set out in each schedule, which help our staff maintain their core competencies by continually developing and improving their knowledge, skills and understanding. All DaMOP training is mandatory as set out in LFB Policy PN0427.
28. The Senior Officer DaMOP programme (for our Station and Group Commanders) was initiated in July 2020, and a revised Strategic Officer DaMOP programme (for Deputy Assistant Commissioners and Assistant Commissioners) has been in place since autumn of 2021.
29. Fire Stations Department remain the biggest end user of DaMOP. Work is ongoing with subject matter experts to ensure that schedules are up-to-date and meet the needs of emerging training needs, such as wildfires and asbestos. Training requirement documents will also be revised to ensure compliance with National Occupational Guidance (NOG).
30. Training within the Brigade is divided into two main areas:
  - a) *Acquisition of skills training* – The initial learning phase. The Brigade's external training provider is responsible for acquisition of skills training. This includes the training of our newly appointed firefighters as well as the development of new skills for more experienced staff undertaking new or modified roles; and
  - b) *Maintenance of skills training* – Once the initial acquisition of skills training has taken place, it will be necessary for our staff to practise their skills, knowledge and understanding, in conjunction with, and in addition to, their existing skills, knowledge and understanding. This 'practice' is what is referred to as maintenance of skills training.
31. We have implemented an Operational Improvement Process (OIP) to support the maintenance of operational competence. The OIP identifies and responds to risk-critical issues that have the potential to affect operational performance. The process monitors operational and training performance, identifying developmental trends and provides mechanisms, including the implementation of training interventions to support our operational staff.
32. At the heart of the process is effective information gathering which allows our crews, monitoring officers and specialist officers, to record and identify developmental trends arising from incidents and training events. Information is recorded that describes individual and team performance and captures the issues related to training, equipment, and procedures. Our Operational Professionalism Board, chaired by the Assistant Commissioner for Operational Policy and Assurance, receives regular reports summarising the information gathered, and makes decisions about changes to and new training interventions, as well as communication/awareness via the Operational News internal publication and Operational News flashes for time critical communication.
33. Our Operational Improvement Process (OIP) is aligned to DaMOP and is closely aligned to the requirements of 'HSG 65 - Successful Health and Safety Management' produced by the Health and Safety Executive.

34. Our training evaluation follows the Kirkpatrick model, which comprises of four levels. Level 1 (reaction) and Level 2 (learning) are already partially embedded in our training at LFB, with work ongoing to expand this using a risk-based approach to prioritisation of this work. The Training Design and Implementation process (TDI) which was introduced in September 2022, requires Level 3 (transfer – behavioural change) and Level 4 (results – organisational performance) to be considered at the point training is commissioned. This sets the foundation for meaningful data analysis and insight, which will continue into 2024/25.
35. In October 2023 we implemented an Assurance and Continuous Improvement team to focus on firefighter development (FFD) training. The team comprises four staff and provides assurance against both the LFB-led and Babcock-led elements of the FFD programme. A widening of the training assurance offering is reflected in the department's budget submission for 2025/26, with due regard to the independence of staff undertaking assurance activities.
36. During 2023/24 our Learning and Professional Development Department completed implementation of an enterprise assurance framework, which maps 'first line' assurance controls for the department's key processes. It identified some gaps in controls and assurance measures and is the subject of ongoing internal monitoring.
37. We are reviewing our contract with Babcock, who are responsible for developing and delivering training for our staff, as part of a strategic review of training effectiveness. The review commenced in August 2023 and comprises seven workstreams.
38. During 2023/24 we initiated a corporate project, Competency Frameworks, to create an online competency management platform for the LFB. This will support our staff in understanding the knowledge, skills, and behaviours alongside the associated learning and training required for them to demonstrate competence in their role. The platform will provide additional clarity to LFB staff, aided by transparent reporting to enable management and corporate oversight of staff competence. The business case for the project was approved in February 2024 and is due to run for three years.
39. Extensive work was carried out in 2023/24 on the implementation of Licence to Operate (L2O), following approval of the L2O concept by the London Fire Commissioner in 2022. L2O ensures that all our operational staff are regularly trained and assessed to meet the required standards to carry out their operational activities competently and safely. A phased rollout of L2O was agreed at our Service Delivery Board in January 2024, covering incident command, emergency response driving, breathing apparatus, and casualty care (also known as immediate emergency care).
40. L2O went live for level three and level four incident command on 22 April 2024, with the other areas described above scheduled for rollout in October 2024 (emergency response driving in a car), April 2025 (level one and level two incident command, fire appliance emergency response driving, and breathing apparatus) and October 2025 (casualty care). We will consider additional operational areas, including hazardous materials, working at height, water (including water rescue and pumps) and extrication and rescue at a future date.

### **High-rise training**

41. Following the tragic fire at Grenfell Tower in 2017, and subsequent Public Inquiry Phase One recommendations, we made substantial changes to our high-rise policies in 2020/21. This included revisions to our Fire Survival Guidance (PN790), High-rise Firefighting (PN633) and a new Evacuation and Rescue Policy (PN970). To support these changes, we then carried out a significant programme of training to all its operational staff.
42. This involved a series of e-learning packages pertaining to each policy, which acted as a pre-cursor for face-to-face instructor input, guided learning exercises and then small and large-scale practical exercises, which all operational staff took part in conjunction with the London Operations Centre (LOC). This took place from the launch of the new policies through to the end of 2023/24, so that that the new policies were embedded into our operational practice and service delivery.

43. The policies are now integrated into DaMOP using the e-learning packages to ensure regular training on station, with a review taking place of the learning from the exercise delivery, which will determine the actions required to maintain learning over the next three-year period.
44. As part of our learning from the Grenfell Tower Fire we acknowledged that alongside large-scale exercising, there was also a need to train our staff in enhanced real fire conditions. In April 2024, we launched the first of our new 'Modern Firefighting' courses. These are designed to upskill our operational staff in their understanding of fire behaviour and modernise available tactics.
45. This course exposes staff to training in realistic environments that replicate the scale and complexity of the conditions found at incidents in London. All operational staff will attend this course over a two-year period, after which we plan to continue to build on those skills by introducing new and more layered conditions in high-rise environments and basements. This will allow our staff to bring their learning from the large-scale exercises into real fire environments.
46. Recognising that any new learning needs to be maintained, the new high-rise policies have been included in our Firefighter Development Programme and remain under review. The 'Modern Firefighting' initiative will also be integrated into firefighter development over the two-year delivery plan.

## **Health and Safety**

47. Matters of operational competence and firefighter safety are reported regularly to our Commissioner's Board through standard performance reports. This includes trend reporting on health and safety events (RIDDORs and operational injuries), and road traffic collisions. Bi-annual health and safety reports are provided to the Commissioner's Board supplying a full overview of our performance against key health and safety indicators. This includes preventative initiatives and interventions, premises audits, occupational health, and safety consultation. Health and safety is a standing item on our Service Delivery Board agenda and more frequent discussions of health and safety performance take place in that Board.
48. The reporting of specific incidents to the Health and Safety Executive (HSE) is required under the Reporting of Injuries, Diseases, and Dangerous Occurrences Regulations 2013 (RIDDOR). In 2023/24 we had 71 RIDDOR reportable injuries, which represents a decrease compared to 2022/23 (75). We monitor a range of corporate indicators for health and safety, including injuries on the incident ground and injuries to members of the public through road traffic collisions (RTCs) involving LFB vehicles. In 2023/24 we continued to focus on work to further reduce the number of RTCs involving LFB vehicles. Our Management of Occupational Road Risk (MORR) group has undertaken several actions to reduce both the likelihood and the severity of RTCs.
49. Due to the operational policy framework and wider safety systems in place we do not experience significant numbers of serious injuries (i.e. we have very few 'specified' injuries under RIDDOR) and the incidents we do have continue to relate mainly to slips and trips, and the moving and handling of operational equipment or casualties (as in previous years). We have focussed on improving the promotion and development of safety leadership, which is pivotal to effective health and safety management. Specific behaviours focussing on health, safety and wellbeing have been included in the LFB behavioural framework and this is supported through safety leadership guidance for our operational managers through individual risk management objectives. We will seek to improve this further through development of the LFB appraisal conversations system in 2024/25 to include specific discussion of health and safety issues. An additional focus in 2023/24 has been the measurement of the LFB safety culture. This work will continue into 2024/25 and will be fed into the production of a safety culture improvement plan.
50. Our Health and Safety department have completed their Enterprise Assurance Framework, identifying key areas of assurance of health and safety performance. We identified a number of improvement actions, some of which were actioned in 2023/24.

## Fire Safety

51. Our specialist fire safety teams continue to maintain prominent levels of engagement with the fire sector, standards bodies, and government. We continue to provide our unique expertise to drive evidence-based change in the built environment where appropriate. New reporting systems for the operators of high-rise residential buildings to supply information about those premises were successfully introduced to facilitate compliance with the Fire Safety (England) Regulations 2022, which came into force in January 2023. Work in this area will continue as we seek to make further improvements.
52. 41 of our officers were seconded to the National Fire Chiefs Council (NFCC) Protection Reform Unit (PRU), who together with those operating from within LFB are continuing to assist with developing and implementing changes to the regulatory regime recommended by Dame Judith Hackitt and by the GTI in its Phase 1 Report. Work to ensure that protecting the most vulnerable in our communities, whilst protecting firefighters during their operations continues to be at the heart of the new regulatory regime. This work includes the ongoing development and revision of national guidance and standards so that in the future we can assure our fire safety protection and prevention work against agreed benchmarks.
53. With the Fire Safety Act 2021 and subordinate legislation now in force, our officers continue to work with the NFCC, Home Office, Department for Levelling Up, Communities and Housing (DLUCH), Health and Safety Executive (HSE), and the Building Safety Regulator (BSR) on the development and implementation of working arrangements under the Building Safety Act 2022. In October 2023 revised policies and fire safety audit practices were introduced to account for the bringing into force of further amendments to the Regulatory Reform (Fire Safety) Order 2005.
54. Under the implementation of the Building Safety Act 2022, LFB host the Building Safety Regulator National Co-ordination Hub. This is the administrative centre for all the new BSR work nationally. The National Co-ordinator ensures that there is consistent approach to this work across all 44 English Fire and Rescue Services. LFB is a member of the Joint Regulators Group, which is shaping how this new regime is operating in a live environment.
55. The Mayor's vision for growth has seen the introduction of the requirement for fire statements, "*a standalone document which defines the fire safety objectives and performance requirements of a development, and the methods by which these objectives will be provided/ satisfied*" (sic). Fire statements should raise the profile of and deliver a tangible improvement to fire safety for new developments. Our technical officers have increased their engagement with local planning authorities and the GLA particularly where schemes include proposals for high-rise residential accommodation. This has allowed us to support the London Plan and the aspirations for the highest standards of fire safety within our built environment.
56. The Fire Safety (England) Regulations 2022, which came into force in January 2023, initiated the high-rise building data portal. This allows all high-rise residential portfolio owners to share information with fire rescue services following recommendations from the GTI. LFB's High Risk Premises Team (HRPT) is managing and triaging the information received and sharing relevant information with front line fire crews. The shared information should provide floor plans, external wall risk information and gives the responsible person the ability to report faults in firefighting facilities to the fire rescue services. All our operational staff have access to this information via our fire appliances and Command Units. This assists our firefighters during an incident, and our inspection staff who are undertaking pre-inspection checks at these premises. The HRPT also ensures that key data relating to buildings with a temporarily changed evacuation strategy is available to the London Operations Centre (LOC) and operational staff, while key enforcement information relevant to operational response is also shared.
57. In addition to the work of our HRPT, we continue to work closely with London Councils and seek to liaise on major consultations to share our experience, key concerns and identify areas of common interest. We remain a standing member of the London Housing Directors' Fire Safety Group and Fire Safety Steering Group as these forums provide opportunities to influence and share information as well as providing updates as to the status of the HRPT.

58. LFB has long advocated the use of sprinklers, and we will continue to lobby for them as part of an appropriate package of fire safety measures. They play a significant role in reducing the devastating impact of fire on people, property, business continuity and the environment and assist our firefighters in carrying out search and rescue operations by restricting the spread of fire.
59. Our officers continue to lobby government to act on the recommendations from the Hackitt review, including further consideration of the use of sprinklers and other automated fire suppression systems (AFSS). LFB has our own sprinkler position statement and our officers work to provide information and raise awareness. We are committed to working closely with national and local government, disability groups, high-rise communities, and other stakeholders to deliver on the recommendations of the GTI in relation to personal emergency evacuation plans (PEEPs) and reach a solution that is workable and improves the safety of our communities and firefighters. Additionally, in response to the government's consultation, we have publicly stated that multiple staircases in tall buildings improves resilience and makes buildings safer and supported the need to include evacuation lifts to ensure equity for all.
60. Through the creation of a centralised Building Design Consultation Hub, we can improve the resilience of our statutory function as part of the Building Regulations process, providing a significant improvement in both turnaround and consistently high-quality technical review. The Hub has become the main point of contact for liaison with building control bodies and their representative groups to enable us to respond and provide feedback on how to continually improve this service.
61. To support our commitment to outward facing fire safety activities we continue to recruit, train and support staff via the Centre of Learning and Excellence (CLE) and wider fire safety service improvement stream (through protection uplift funding from the Home Office). Core activities to maintain and build fire safety competency across the organisation include:
- a) Recruiting Fire Safety Advisors;
  - b) Working with the National Fire Chiefs Council (NFCC) on accreditation of regulators through a partnership with the institute of Fire Engineers (IFE);
  - c) Training, upskilling operational colleagues in Fire Safety through technical qualifications such as Level 3 Introduction in Fire Safety; and
  - d) Working with Skills for Justice on the development of a Level 2 qualification in Fire Safety Checks to further enhance the support protection work completed by our operational staff based on fire stations.
62. In March 2023, we launched a campaign to help people keep safe in response to the growing fire risks posed by Electric Powered Personal Vehicles (EPPVs). #Chargesafe was launched with the media, our stakeholders, and partners in London, and we promoted #Chargesafe via social media. Our firefighters also carried out targeted engagement with communities to raise awareness with EPPV users, including leafletting people who work as food delivery drivers. We have introduced updates to policies and guidance to support inspecting staff regulate the fire risks associate with EPPV and other battery technology.
63. LFB has a long-standing history of delivering child and youth engagement, intervention, and education schemes which contribute to making London a safer city by working with its young people across all aspects of prevention. This includes fire, water, and road safety, alongside anti-social behaviour, and the consequences of actions, to drive and forge safer, stronger, healthier, and cohesive communities. Our schemes are aimed mainly at primary and secondary age children and young people, and cover a broad cross-section of youth, including into early years with visits to nurseries and children's centres. All of the youth programmes we deliver are attended by a wide range of participants and provide an opportunity for us to increase awareness of the LFB amongst diverse communities.

64. During 2023/24 we delivered the following under our children and youth programmes:
- a) Safety education into primary schools, a blue light collaboration project 'Safety First' delivering safety education into secondary schools;
  - b) Fire Cadets offering long term engagement to young people living or attending school in all London boroughs (inclusive of the City of London);
  - c) Fire-setting Intervention Scheme (FIS) delivering one-to-one fire safety education where concerns have been raised around fire setting and fire play behaviour; and
  - d) Youth Projects supporting local boroughs devise and deliver bespoke projects to support an identified need for young people in the area.
65. We have identified areas for innovation and growth to deliver trauma informed interventions, engagement activities, and safety education to children and young people, which supports their personal development and social and emotional learning. This includes scheduling a review of the resources utilised by the Fire Cadets and Education Teams, exploring the potential to engage with young offenders, and re-introducing early intervention programmes following the release of the Serious Violence Duty Statutory Guidance in December 2022. We will explore these areas during 2024/25 with a view to embed new resources and programmes into Youth Services by the start of the 2025 academic year.
66. The blue light collaborative project 'The London Safety Centre' is well established with the objectives of joining up prevention activity between the Metropolitan Police, London Ambulance Service and LFB, to improve joint engagement with the public. Several initiatives have already been implemented, including joint continuing professional development (CPD) sessions, referrals of high-risk individuals between organisations, particularly hoarders, and 'Crime Prevention for Everyone' which seeks to train local housing officers in fire prevention and security risk. An application for further funding to continue to deliver this collaborative project has been submitted and is currently under review. If successful, this would enable the project to continue to provide joined up working across the blue light organisations for an additional 4 years.
67. Our delivery and prioritisation of high-risk home fire safety visits (HFSVs) has been recognised in the recent lifting of a Cause of Concern by His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS), with positive recognition that our approach to prevention and HFSVs has changed, making the most vulnerable safer.
68. During 2023/24 we implemented a new triage system that enables us to respond proportionately to the level of risk identified. A new out of hours provision is in place via the London Operations Centre (LOC). Our crews can now be mobilised to very high-risk individuals within 4 hours. Low risk individuals are signposted to the online Home Fire Safety checker or sent the HFSV booklet if they are unable to access the checker, freeing up resources to focus those individuals at greater risk.
69. Home Fire Safety Checker (HFSC) triages are a critical measure for the LFB, as these triages underpin our strategy to focus resources on those at greatest risk. In January 2024 we saw the highest number of triage completions since the launch of the checker at 1,469. We are aiming to further increase triages through a combination of measures, including continued investment in paid-for public digital campaigns, as well as optimisation of the checker.
70. We have launched a new HFSV policy and e-learning package for all station personnel to complete, and our officers continue to deliver on prevention and protection work as outlined in the LFB's Community Engagement Strategy. This includes working collaboratively with the Community Engagement Team to ensure that fire safety recommendations are addressed.
71. We are also working to make our web content more accessible to all members of the public, businesses and partners and are further developing digital self-help tools for prevention and protection. Our officers are utilising feedback from community engagement activities to build more relevant and engaging content on the external LFB website.

## Mutual aid agreements

72. The National Framework requires fire and rescue services to enter mutual aid and reinforcement schemes with other (neighbouring) services. Fire and rescue authorities must make provision to respond to incidents such as fires, road traffic collisions and emergencies within their area, and in other Fire and Rescue Service (FRS) areas, in accordance with mutual aid agreements. This is partly to ensure that communities living near service borders are not isolated from emergency cover because of administration boundaries. These arrangements are known as 'cross-border' and resources that may be requested to deploy cross-border are mobilised through mutual aid arrangements provided for under sections 13 and 16 of the Fire and Rescue Services Act 2004 (FRSA).
73. The LFB holds mutual aid agreements with all our surrounding fire and rescue authority areas. Incidents can be attended by the LFB and our resources in the six surrounding fire authorities namely – Hertfordshire, Essex, Kent, Surrey, Royal Berkshire, and Buckinghamshire. LFB resources may also be mobilised cross-border to 'standby' at neighbouring stations. Data for 2023/24 shows that we were mobilised to 720 incidents outside London and that the number of over-the-border incidents decreased from 2022/23 (862 incidents). 550 incidents in London were attended by neighbouring fire and rescue authorities, which is 130 less than the previous financial year (680). This was as a result of the increase in grassland fires due to the hot and dry weather conditions in July and August 2022. In the context of the number of incidents the LFB attends annually (approximately 100,000), these incidents do not form a significant proportion. The number of incidents attended by neighbouring services tends to fluctuate from year to year and is influenced by the number of fire engines which are available at any one time. Hertfordshire fire and rescue service was the county service called upon most often (195) during 2023/24 and covers cross-border intersections of the M25 (the stations of Potters Bar and Cheshunt) and the M1 (the stations of Borehamwood and Rickmansworth).
74. Charging neighbouring fire and rescue authorities on a cost recovery basis for the use of LFB resources under section 13/16 of the FRSA was introduced in April 2014. This has been reciprocated by our neighbouring fire and rescue authorities who also charge us for the use of their resources.

## National Resilience

75. National resilience is defined as the capacity and capability of fire and rescue authorities to work together and with other Category 1 and 2 responders to deliver a sustained, effective response to major incidents, emergencies and disruptive challenges, such as (but not limited to) those identified in the [National Risk Register of Civil Emergencies](#) and National Security Risk Assessment (NSRA).
76. This includes risks that need to be planned for on a strategic national basis because their impacts and consequences would be of such scale and/or complexity that local resources would be insufficient, even when considering mutual aid arrangements, pooling and reconfiguration of resources and collective action.
77. The National Framework makes clear there is a need to plan for and respond to incidents of such scale and/or complexity. The government retains strategic responsibility for national resilience, and it is heavily reliant upon local fire and rescue authorities in support of this. The National Framework sets out the requirement of Fire and Rescue Authorities to work collectively but also with the Fire and Rescue Strategic Resilience Board to provide assurance to Government that:
- a) Risks are assessed, plans are in place and any gaps between existing capability and that needed to ensure national resilience are identified;
  - b) Existing specialist national resilience capabilities are fit-for-purpose and resilient; and
  - c) Any new capabilities that fire and rescue authorities are commissioned to deliver by government are procured, maintained, and managed in the most cost-effective manner that delivers value for money whilst ensuring capabilities are fit-for-purpose and resilient.



78. The programme consists of several distinct capabilities. These are:
- a) Marauding Terrorist Attack (MTA);
  - b) Chemical, Biological, Radiological, Nuclear and Explosive CBRN(E);
  - c) Flood Response;
  - d) High Volume Pumping (HVP);
  - e) Mass Decontamination; and
  - f) Urban Search and Rescue (USAR).
79. Several of the National Resilience assets are located within the LFB reflecting the importance of the capital city to national resilience in providing these capabilities to both London and the rest of the country.
80. Assessment and assurance for the LFB National Resilience assets is exercised through the National Resilience Assurance Team (NRAT). The assurance process has been developed as a long-term programme to ensure that the fire and rescue services, which have received National Resilience assets, achieve, and maintain an efficient, robust, and effective operational capability to respond to national and major emergencies. In previous years, this has centred on thematic reviews, including multi-capability and the dedicated use of equipment and vehicles. The assessment process follows a three-year rolling programme. At a high level, the process works as follows:
- a) Year 1 – Self-assessment;
  - b) Year 2 – Coordinated exercise with direct observation by NRAT; and
  - c) Year 3 – National or regional exercise.

### **Marauding Terrorist Attacks (MTA)**

81. In April 2022, the London Fire Commissioner signed a Joint Collective Agreement with the Fire Brigades Union relating to marauding terrorist attacks (MTA). The agreement allowed us to move forward with plans to significantly improve our response to an act of terrorism by ensuring all our front-line staff are trained and equipped with the correct Ballistic Personal Protective Equipment (BPPE) and sked rescue stretchers, in addition to the current available equipment, to deliver a search and rescue response at an MTA. This includes delivering immediate emergency care to those that have been injured.

### **MTA Training**

82. Our initial roll out of MTA training covers fire and rescue service responsibilities at a terrorist incident, partner roles and capabilities, protocols for decision making and sharing information with partners, and a tactical decision-making exercise. In addition, all our crews complete a multi-agency exercise to implement the acquisition knowledge into a practical scenario, working with armed police officers and the ambulance service.
83. We completed training in all boroughs in May 2024, and are now delivering frontline MTA level one and two capabilities from all Boroughs with 142 pumping appliances, fourteen fire rescue units (FRUs), and eleven aerial appliances. Our Command Units and aerials do not carry BPPE, but the crews are MTA trained. We also have two operational support units (OSUs) that carry a resource pack consisting of nine sets of BPPE each and additional stretchers, which will be mobilised as part of the Incident Type Code mobilisation, with FRUs also carrying additional BPPE.



## **Flood response**

84. We have two declared 'Type B' flood teams. We completed our Year 1 self-assessment in September 2023, which resulted in four actions plans to improve training hours and CPD. These improvements are being addressed with the next assurance round, which is due to take place in August 2024.

## **High Volume Pumps**

85. We host six High Volume Pump sets. The year 1 self-assessment was completed in August 2023, this was followed by an assurance visit in June 2024 that recorded an improvement in crew competence with no significant areas for improvement and with only minor requirements to improve procedure rather than any areas of performance and compliance.

## **Mass Decontamination**

86. We host three operational and two training Mass Decontamination units. The last assurance was a self-assessment which was completed in March 2023. During this assessment, six areas of good practice and six areas requiring improvement were identified.
87. A follow-up assurance visit was completed in June 2024 noting improvements resulting in full compliance.

## **Urban Search and Rescue (USAR)**

88. We host four USAR units and eight National Tactical Advisors. Year 1 and 2 assurance took place in June 2023, resulting in several actions for improvement which are in progress.
89. Improvements will include the adoption of the recommendations from the Home Office New Dimensions Two programme set for implementation in 2024/25.

## **International Search and Rescue (ISAR)**

90. London Fire Brigade supports the UK Government international search and rescue capability with a Rescue team and an Equipment Logistics team. The team has deployed operationally to Turkey, Morocco, and to Malawi for flood response support.
91. The team was re-classified as a heavy rescue team in November 2023 enabling continued international deployment as part of the assurance and auditing process.
92. An assurance programme for this capability is being developed by the National Resilience capability team and the wider UK team will attend their five yearly assurance exercise undertaken by the United Nations (next due 2028).

## **Other resilience management arrangements**

93. We ensure the resilience of national assets we manage by:
- a) Issuing a Statement of Training Requirements (SOTR) annually to help maintain enough qualified and competent personnel to meet National Resilience requirements;
  - b) Maintaining National Resilience assets to ensure operational readiness;
  - c) Undertaking secure training to meet degradation estimates;
  - d) Promulgating safety notices relating to National Resilience assets; and
  - e) Having sufficient resources to host large scale exercises to demonstrate competence.

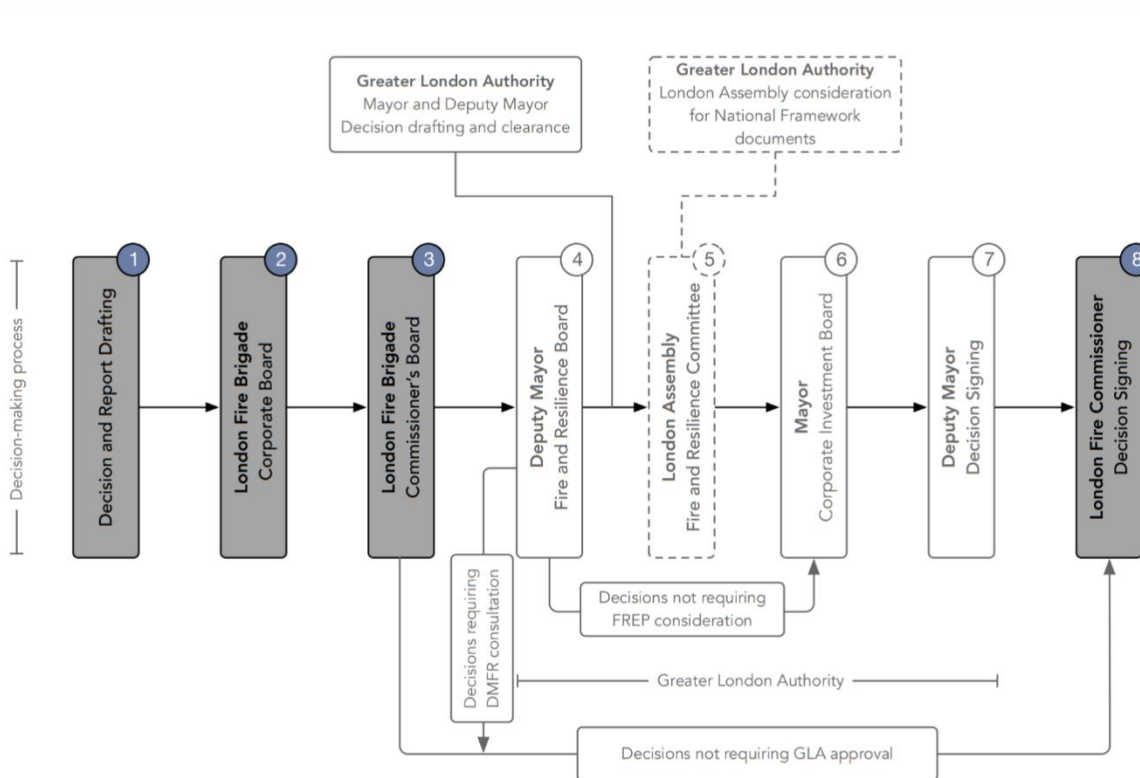
94. Our staff also have a primary role for the national fire sectors delivery of CONTEST, the UK Government's Counter Terrorism strategy. This involves working collaboratively with colleagues from the other blue light services, partner agencies and government departments to develop multi-agency capabilities for responding to a wide range of terrorist and high-threat incidents. The London Fire Commissioner is the National Fire Chief Council's (NFCC) National Security lead and Chair of the National Security Board (NSB) and is responsible for the delivery of the UK Fire and Rescue Service response to Counter Terrorism, Counter State Threats, and Protective Security Operations.
95. The LFB Deputy Commissioner for Operational Response and Preparedness is the NFCC lead for Marauding Terrorist Attacks (MTA). We developed and implemented the concept of National Inter-agency liaison officers (NILOs) which is now embedded across the emergency services throughout the UK. The Assistant Commissioner for Operational Resilience and Control is the NFCC Counter Terrorism Coordinator inclusive of NILO which includes the National Coordination Office, delivery of the NILO foundation and National Control Liaison Officers courses for all services.

## **Governance Assurance**

96. The LFC is a corporation sole that came into being on 1 April 2018, replacing the London Fire and Emergency Planning Authority (LFEPA). In March 2021, the Mayor of London issued the [London Fire Commissioner Governance Direction 2018](#) to set out those matters requiring Mayoral consent, those requiring the Deputy Mayor for Fire and Resilience's consent and those on which the Deputy Mayor for Fire and Resilience needs to be consulted. It also requires the LFC to adopt the Greater London Authority (GLA) corporate governance framework and to follow GLA practice on staff political restrictions, based on those in the Local Government and Housing Act 1989. In addition, the functions of the LFC shall be exercised by the office holder to fulfil the commitments given by LFEPA as a signatory to the GLA Group Corporate Governance Framework Agreement.
97. The LFC's governance framework is based on the CIPFA/SoLACE Delivering Good Governance *in Local Government Framework 2016* which requires the LFC to be responsible for ensuring that:
- a) Business is conducted in accordance with all relevant laws and regulations;
  - b) Public money is safeguarded and properly accounted for; and
  - c) Resources are used economically, efficiently, and effectively to achieve agreed priorities which benefit local people.
98. This includes defining scrutiny arrangements, maintaining effective policies and procedures on whistleblowing and complaint handling (on the London Fire website), and engaging with all sections of the local community through community safety strategies and partnerships to ensure accountability. The LFC has a scheme of governance which incorporates a Corporate Code of Governance. The scheme sets out detailed governance arrangements for the Commissioner as the fire and rescue authority for London. It complies with the GLA Group Corporate Governance Framework and is drafted to ensure that the high standard of governance and accountability achieved by the predecessor Authority is continued.
99. The system of internal control is also a significant part of the LFC's governance framework and is designed to manage risk to a reasonable level. It cannot eliminate all risk of failure to achieve policies, aims and objectives, and can therefore only provide reasonable and not absolute assurance of effectiveness.
100. The system of internal control is based on an ongoing process designed to identify and prioritise risks to the achievement of the LFC's policies, aims and objectives, to evaluate the likelihood of those risks being realised and the impact should they be realised, and to manage them efficiently, effectively, and economically.

## Decision making framework and scrutiny

101. The London Fire Commissioner's decision-making framework is outlined below:



102. Steps one to three incorporate the LFC's internal decision-making structures. Step four is required by the Deputy Mayor for Fire and Resilience to ensure that only approved business proceeds to the GLA for consideration. Step five is required for documents produced by LFC, including this Statement of Assurance and similar documents that fall under the national framework; these require a report and consideration by the Fire, Rescue and Resilience Committee (as the proper instrument of the London Assembly). Steps six and seven are Greater London Authority (GLA) stages, required for a formal decision of the Mayor or Deputy Mayor for Fire and Resilience (DMFR) where the London Fire Commissioner has been required to consult or seek prior consent by the Mayor's London Fire Commissioner Governance Direction 2018. Steps six and seven are not needed in matters that require prior consultation, as opposed to prior approval. Step eight is the final stage in the process.

103. Scrutiny of the decision-making framework is exercised through a suite of Boards, the LFC's Commissioner's Board, and since May 2024 the Deputy Mayor's Fire Board, and the London Assembly via the Fire Committee.

## Review of effectiveness of governance arrangements

104. The LFC uses several ways to review the effectiveness of governance arrangements. One of the key assurance statements, in reviewing effectiveness, is the annual report and opinion of the external auditors. Another significant element is the internal audit function conducted on behalf of the LFC by the Mayor's Office for Policing and Crime (MOPAC). MOPAC is fully compliant with Public Sector Internal Audit Standards (PSIAS). Internal audit covers key governance processes, risk management and internal controls. During 2023/24, Internal Audit reviewed and reported on key areas of the business. The internal auditors' opinion for 2023/24 was that, based on the areas audited, the control framework continues to develop however it is not yet fully effective in supporting the achievement of strategic objectives. Whilst progress has been made, planned activity to enhance and embed capability, portfolio management, risk and assurance activity, as part of an integrated approach to governance, will be instrumental to increasing maturity and delivering a fully effective framework going forward. As the LFB continues to undergo significant transformation, improving the maturity of the wider control environment will help to guide, co-ordinate, prioritise, sustain and monitor the delivery of activities and achievement of objectives. There is

an end of year report detailing the work conducted by MOPAC.

105. The preparation of an Annual Governance Statement to support the Annual Statement of Accounts is a statutory requirement for local authorities. Its purpose is to demonstrate and evidence that there is a continuous review of the effectiveness of the Authority's internal control, performance, and risk management systems.
106. The 2023/24 Annual Governance Statement details our ongoing work to deliver the LFC'S Community Risk Management Plan (CRMP), 'Your London Fire Brigade', including the rollout of Borough Risk Management Plans, Service Strategies, and Station Plans. The statement also details our continuing work to change the workplace culture at London Fire Brigade, including the adoption of our new LFB Values. It also references the completion of all Grenfell Tower Inquiry Phase 1 recommendations, an important milestone for the Brigade, which has resulted in significant improvements and changes to how we train our firefighters, our processes for major incidents, and the introduction of new equipment and technology.
107. The Annual Governance Statement forms part of the Statement of Accounts 2023/24.

### **Transparency**

108. The LFC is committed to meeting the mandatory requirements for the publication of transparency data set out in the Local Government Transparency Code (DCLG, February 2015) and the Information Commissioner's definitions document for Freedom of Information Act (FOIA) publication schemes. There is a dedicated transparency page on our external website as well as a number of data sets on the [GLA London Datastore](#), including data for all incidents we attended and resources we mobilised to those incidents since January 2009 (updated monthly). The web mapping tool allows users to see the numbers of different types of incidents as well as attendance times for first and second fire engines down to ward level and is updated monthly. In the period 2023/24, some data sets lapsed past the date they were due to be updated. Work has been carried out to get all the date up to date, but at the time of writing this report, three of the required data are still outstanding.

### **Risk management**

109. Our risk management activities are focused on two main areas. One is the Assessment of Risk (AoR) referenced at paragraphs 15 to 17 which deals with risk in the community of London ("outward" facing risks) and informs Community Risk Management Plan (CRMP). The second is risk to the LFB itself ("inward" facing risks), and these are threats that would seriously damage LFB or prevent us from operating effectively, which is addressed through our internal strategic risk management framework. Put simply, our community risk management planning aims to determine what the corporate priorities should be, and our strategic risk management strategy sets out the risk framework to help support and deliver on these priorities.
110. Our internal strategic risk management framework has been in operation since May 2021 and enables us to identify and manage significant risks. The framework is applied across directorates and departments where risks are assessed for their likelihood and impact and which places them in the framework at either the corporate, directorate or departmental level, whereby they can be monitored, managed, and scrutinised effectively. Risks and risk management action at corporate and directorate level are reviewed at appropriate monthly management and/or board meetings, and at Commissioner's Board at least quarterly.
111. Work has been ongoing to develop the maturity of our risk management approach, with particular interventions at a departmental level to enhance risk register content, including a 'decluttering' exercise to rationalise and refine the number of risks and controls in the system to a more manageable level.
112. As risk management sophistication has increased within the workforce, it has provided an opportunity for us to develop a risk appetite approach which will offer clarity on what the organisation is prepared (and not prepared) to do in pursuit of our strategic objectives. It will provide a useful guide to staff to put boundaries in place for acceptable risk taking, the appropriate escalation of risks that exceed appetite levels, definition of the Brigade's risk culture and ultimately, the balancing of risk taking against potential rewards.

113. Work has commenced to define the Brigade's risk appetite, including categorisation and appetite levels, with adoption of a risk appetite statement planned for 2024/25.

### **Business Continuity**

114. The Civil Contingencies Act 2004 identifies the LFC as a Category 1 Responder and imposes a statutory duty on the Brigade to have robust business continuity arrangements in place.
115. LFB has had an established business continuity programme in place since 2005. This programme and supporting activities are underpinned by two core business continuity policy documents – PN 0701 Business Continuity Management Policy, and the LFB Corporate Business Continuity Plan. Both documents were reviewed and updated during 2023/24 to bring them up to date with current practices within the business continuity function and the wider Brigade, including the management of major incidents which fall under the LFB Strategic Response Arrangements (PN 0699).
116. In 2023/24, our Business Continuity Team developed a new business continuity approach, which includes better alignment with the Risk and Business Assurance functions to offer a more holistic approach to managing key risks and other potential sources of disruption. This approach is outlined in the Business Continuity Framework, which is documented within the LFB Business Continuity Management Policy (PN 0701).
117. As part of the new approach the team also developed a new set of templates to support the completion of Business Impact Analyses (BIAs) and development of Business Continuity Plans (BCPs). These templates were rolled out on a trial basis at the end of 2023/24 and will continue to be further tested and developed during 2024/25
118. A key focus for 2024/25 will be the review of our business continuity exercising and testing programme. This will include the development of a more formalised approach to our exercising and testing planning process, taking into consideration key risks, new and emerging risks (horizon scanning), seasonal disruptions, compliance with statutory duties, and outputs from our Enterprise Assurance Frameworks (EAFs).

### **Information Security**

119. The LFB information security policy provides a framework for the management of the security of our information assets and technology environments and is supported by a suite of policies, to provide an Information Security Management System (ISMS). The policy is broadly aligned to ISO 27001; during 2024-25 the policy will be reviewed and updated to align to ISO 27001:2022 (the new/latest version of the ISO 27001 standard).
120. We take a proactive approach to the assessment of our cyber security programme, which includes engagement with external third parties to test and provide assurance on our cyber security controls. Third-party penetration tests are commissioned annually, with appropriate priority given to programmes of work to remediate vulnerabilities reported. A security assessment of our Microsoft 365 security controls is also conducted annually by Microsoft. This was conducted in October 2023.
121. During 2023-24, we improved our compliance with industry best practice based on recognised standards, with the aim of further improving cyber security and resilience and providing assurance that controls are appropriately mitigating cyber risks. We commissioned an independent gap analysis against the Cyber Essentials standard in 2022 that led to a dedicated programme of work that has continued to progress during 2023-24. A Cyber Essentials working group meets monthly to monitor progress of actions.
122. We have future plans to align our approach to cyber resilience against a new Cyber Assurance Framework (CAF) that has been developed for fire and rescue services, led by the Home Office. During 2023-24, we participated in a pilot CAF assessment, which included self-assessment of both our London Operations Centre (LOC) and corporate environments.

123. During 2023-24 we introduced an updated cyber security awareness (computer based) training package across the LFB. Completion rates by some departments had fallen below the level that we might have expected, so our ICT department engaged with Heads of Service to raise the profile of this issue with the intention of driving up completion rates. In addition, reminder notifications are now generated for office-based staff when completion is overdue. Watches on stations complete the training together via a dedicated appointment and this has proven to be very successful with high completion rates reported for station-based staff.

### **Enterprise Assurance Framework**

124. The LFB Enterprise Assurance Framework (EAF) sets out our approach to identifying and mapping our key processes and controls, and understanding what level of assurance is in place across the 'four lines of defence' as defined by the Institute of Internal Audit. During 2023/24 this mapping process was predominantly focused on assurance in the first line of defence and identifying key processes and controls for evaluation by the LFB Business Assurance team.
125. We have made significant progress on the development of department EAFs throughout 2023/24, with 19 out of 20 departments having completed the identification of their key processes.

### **Mayor's Office for Policing and Crime (MOPAC) – Internal Audit**

126. The Internal Audit function (MOPAC) reviews our key governance processes, risk management and internal controls. During 2023/24, our internal auditors' opinion was that, based on the areas audited, the LFC's control framework is adequately designed although some controls are not operating effectively to mitigate key system risks. There is an end of year report detailing the work conducted by MOPAC.
127. An integral part of building the Brigade's enterprise assurance framework is reducing the time to close audit and assurance actions and learn from recommendations from our independent audit providers, including MOPAC.
128. Progress on audits is provided to the Performance, Risk and Assurance Board on a quarterly basis and all audit recommendations over 90 days are highlighted for review.

### **Independent Operational Assurance Advisor (IOAA)**

129. As part of our response to the recommendations of the GTI Phase One Report and HMICFRS inspection, we commissioned the services of an Independent Operational Assurance Advisor (IOAA) to carry out a programme of assurance work that reflects the risk critical improvement priorities of the Brigade.
130. To date the IOAA has submitted five reports for specific areas of assurance across LFB and has raised several recommendations requiring attention. The reports cover:
- a) Operational Learning and Improvement – This review was to test whether LFB uses appropriate tools and sources to inform operational learning needs and that there is effective measurement to provide assurance on the skill, competence, and safety of our workforce (e.g. health and safety data, operational debriefing, PDR data);
  - b) Incident Command – This review was to check whether the Brigade had learnt lessons from the GTI and recent HMICFRS reports;
  - c) Training Assurance – This review was to provide assurance that the Brigade is developing and implementing an approach to training and learning that addresses the concerns set out by the GTI, HMICFRS and the Scott Report;
  - d) London Operations Centre (LOC) – This review was to provide assurance following a period of transformational change in the approach to developing and assuring LOC capability and competence, review certain areas including how training competence is assured within LOC, and



the quality assurance process for assuring calls handled by LOC; and

- e) Operational Resilience - This review focused on how the team were delivering key programmes including the role out of MTA training.

- 131. Progress on the recommendations from each of the five reports are reported to the Performance, Risk and Assurance Board on a quarterly basis.

### **The Audit Committee**

- 132. The Audit Committee, which comprises independent and experienced professionals appointed to serve terms of up to six years, was introduced in November 2020 to provide more robust scrutiny and assurance of the Brigade's financial, risk and governance and other internal control arrangements.
- 133. The committee adopts a thematic approach whereby time is dedicated at each of its four meetings to analyse a key corporate risk with deep dives undertaken to better understand the landscape within which it exists, whilst also retaining an overarching view of Brigade-wide matters through scrutiny of periodic integrated reports such as the quarterly Business Resilience and Key Performance Indicators (KPIs) reports, and annual reports such as the annual governance statement and statement of accounts.
- 134. The formal scrutiny work undertaken at Audit Committee meetings is supplemented by informal work undertaken by its committee members to better understand and acquaint themselves with the operation of the London Fire Brigade.

### **Financial assurance**

- 135. All local authority accounts are required to adopt "*proper accounting practice*" based on either statutory requirements or the Code of Practice on Local Authority Accounting in the UK (the Code) as published by the Chartered Institute of Public Finance and Accountancy (CIPFA). These specify the principles and practices of accounting required to prepare a Statement of Accounts that "*present a true and fair view*".
- 136. The LFB Director for Corporate Services approved the draft Statement of Accounts for the financial year 2023/24 on 31 May 2024. This was then published as a draft and submitted for external audit.
- 137. An independent audit of the accounts is undertaken by an external audit provider. For the year 2023/24, this work is to be undertaken by Ernst and Young LLP.
- 138. The external auditor undertakes a review of the accounts and forms an overall opinion, which is published as part of the audited Statement of Accounts.
- 139. A copy of the draft Statement of Accounts for 2023/24 can be found here: <https://www.london-fire.gov.uk/about-us/transparency/information-we-publish>.

### **Efficiency Plan**

- 140. In March 2016, the Secretary of State for Communities and Local Government invited local authorities to publish locally owned and locally driven four-year efficiency plans. A separate efficiency plan was prepared to meet this requirement for the first four years. Subsequently the fire and rescue national framework set out the documents each Fire and Rescue Service (FRS) is required to produce, which include an annual efficiency plan, medium term financial strategy and a reserves strategy.
- 141. To meet this requirement a Medium-Term Financial Plan, Reserves Strategy and Efficiency Plan were incorporated into and approved as part of the LFC's Budget Submission for 2024/25 to the Mayor (LFC-23-107y), for consultation with the Fire Resilience and Emergency Planning Committee (FREP). This was then updated and approved as the LFC Final Budget 2024/25 (LFC-24-027).

## Culture Review

142. In March 2021, the London Fire Commissioner (LFC) initiated an independent review of LFB's culture. This was conducted by Nazir Afzal and reported in November 2022. The review highlighted a culture of institutional racism, misogyny, and poor treatment of neurodiverse and LGBTQ+ colleagues, supported by evidence of poor and unfair treatment of marginalised groups across the Brigade. The report made 23 recommendations.
143. We were subsequently moved to 'Engage' status by the His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS). This is an enhanced form of monitoring. In March 2023 HMICFRS published a report on the Values and Culture in Fire and Rescue Services across England. This report made 35 recommendations for cultural improvement.
144. We have established a programme team and structure to drive and support the improvement needed. Deputy Commissioner Jonathan Smith is the Senior Responsible Officer and is supported by a team of skilled and experienced staff in programme and project management. The programme incorporates the recommendations from the Culture Review, the commitments given in the 'Your London Fire Brigade plan 2023 – 29', the recommendations from the independent review of LFB People Services and those in HMICFRS Values and Culture report. This approach ensures an integrated and coordinated approach to the improvements required.
145. In August 2023 Martin Forde KC was appointed as the independent chair of an Advisory Panel set up to support and scrutinise LFB in making the improvements. The panel consists of representatives from the Home Office, Greater London Authority (GLA), National Fire Chiefs Council, the community, and representative bodies. The panel held its first meeting in October 2023 with five to six meetings planned per year.
146. The Commissioner and senior LFB leaders have reported regularly to the GLA's Fire, Resilience and Emergency Planning Committee and the Fire and Resilience Board chaired by the Deputy Mayor. The GLA will continue to scrutinise progress made on cultural transformation.
147. In March 2024 we were removed from Engage with HMICFRS recognising that 'appropriate and robust governance arrangements [were] in place to monitor progress of the action plan'.
148. Immediately following the publication of the Culture Review, we implemented a zero-tolerance approach to discrimination, harassment, and bullying, and launched an external complaints service. The service also undertook an historic review of discrimination, harassment, and bullying cases from the last five years to enable us to learn lessons from the past staff experiences and to ensure correct case handling.
149. In January 2024 we established a professional standards unit to monitor and uphold the standards of behaviour expected across the Brigade. It has an important role in upskilling staff, especially managers, and investigates complaints and grievances. New misconduct and grievance policies and procedures have been introduced. An external provider has been commissioned to manage and investigate complex cases and those involving senior members of staff. This provider also undertakes quality assurance of investigations and operates an independent reporting line.
150. We formally adopted the NFCC Code of Ethics in October 2023 and the new LFB values were launched in December 2023. The LFB Values were developed through analysis of 8,000 comments from the staff survey, feedback from Leading Culture Conversations events and testing with over 300 staff in workshops. A values and behaviours framework provides clarity to staff about acceptable and unacceptable behaviour aligned to the values. Briefings by senior staff and workshops with all watches and teams (circa 5700 staff) are taking place between December 2023 and June 2024.



151. In 2022 we launched three leadership programmes which represented the largest leadership training programme in the Brigade's history. Following the Culture Review and HMICFRS reports, it was appropriate to consider how our training and learning and development provision could be improved. The current redesign of the programme includes the adoption of the NFCC Supervisory Leadership Development Programme and Middle Leadership Development Programme. Robust evaluation processes have been introduced for all current leadership training courses.
152. In June 2023 we launched appraisal conversations. As part of this process staff are asked to discuss career aspirations with their line manager. This is the first step in staff understanding the progression paths open to them and the development required to progress and supports the work we are about to commence on talent management across all staff groups. LFB values have been incorporated into the appraisals and work is underway to expand the process so more detailed analysis of development needs and potential pathways can be assessed.
153. Since the publication of the Culture Review over 1,000 leaders have attended a course that helps them recognise and manage stress, anxiety and depression in themselves and their staff. Our Mental Health First Aider scheme is continuing to grow with over 300 staff now trained to provide emotional support and signposting for colleagues.
154. The Samaritans have been supporting LFB in reviewing our policies and procedures in relation to the suicide of a member of staff. The review was supported by a Steering Group comprising of representatives from the Culture Transformation programme, Trade Unions, Equality Support Groups, Positive Improvement Team, Fire Fighters Charity, Wellbeing team and Counselling and Trauma Service. A suicide postvention toolkit is being developed to ensure a consistent and effective response which supports staff involved and affected. This will be supported by learning and development for all staff and specific training for those who perform key roles.
155. In response to the independent review of People Services, we have brought in additional staff to support the changes required and to modernise the current HR operating model. Since May 2023 work has been ongoing to align the activities in People Services to our strategic priorities. This has been done under the direction of an interim Chief HR Officer and as part of the wider programme of transformation. This has involved a restructuring of the HR functions which is being carried out in two phases.
156. We have reviewed all our HR policies to ensure they are current, consistent, clear, and simple. This has resulted in the number of HR policies being reduced from 114 to 63, with the revised policies using simple language and guidance notes to ensure accessibility for staff. We have developed a new People Strategy. In order to improve the service provided to staff Help Desk staff have received training and new Frequently Asked Questions have been developed. Training for managers will be rolled out by a restructured HR Business Partnering team. To support the transformation and professionalisation of the directorate, our staff will receive accredited Chartered Institute of Personnel and Development (CIPD) training.

### **Grenfell Tower Inquiry**

157. On 14 June 2017, LFB received the first of multiple calls to a fire at Grenfell Tower in North Kensington. The fire affected all floors of the 25-storey building and was declared a major incident by the Brigade. The fire was the largest residential fire attended by the Brigade since the Second World War and resulted in the deaths of 72 people.
158. Phase 1 of the GTI, which focused on what happened on the night of the fire, ended in December 2018. The Phase 1 report was published in October 2019 and made a total of 46 recommendations, which incorporated 14 recommendations directed solely at the LFB, together with 15 recommendations aimed at other fire and rescue services and other emergency services, including the London Fire Brigade. In addition, a further 11 recommendations were directed at building owners and managers and His Majesty's Government, and require some action by LFB once implemented by building owners, managers and His Majesty's Government. The remaining six recommendations have no impact on the Brigade.

159. The key findings and the improvement actions to address the Phase 1 Inquiry recommendations, alongside the operational learning identified by LFB's internal investigation, were incorporated into a comprehensive action plan, which has been amalgamated with the reporting on the HMICFRS action plan.
160. As at the end of 2023/24, we are pleased to report that all 29 recommendations which were directed specifically at LFB, all Fire & Rescue Services or Emergency Services have now been completed in addition to 9 out of 11 recommendations directed at partner agencies/other organisations which also require some action on LFB's part.
161. Phase 2 of the Inquiry commenced in early 2020 but was suspended because of the COVID-19 pandemic. The Inquiry recommenced in July 2020 and completed its evidential hearings in November 2022. The Phase 2 report was published in September 2024 and the Statement of Assurance for 2024/2025 will detail how LFB has responded to the recommendations made.
162. The deliverables continue to be monitored quarterly through our Performance, Risk and Assurance Board, Commissioner's Board and the Deputy Mayor for London's Fire and Resilience Board. Progress is also reported to the Home Office.

### **Inspection by His Majesty's Inspectorate of Constabulary and Fire and Rescue Services**

163. His Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) provides a crucial assurance function in three main areas, how effective a fire and rescue service is, how efficient it is, and how well it manages its people (staff). The Inspectorate looks at whether a service is meeting its statutory obligations as well as highlighting good practice, and identifies areas where improvement is needed so that remedial or constructive action can be taken.
164. Our second full inspection by HMICFRS took place between November 2021 and January 2022. As well as looking at progress made since the original first full inspection, this time, the inspection carried out a number of focus groups and station visits looking at service delivery areas incorporating prevention and protection, response, training as well as related support areas such as culture, fleet, ICT, health and safety and communications. The second full inspection report from the HMICFRS was received in July 2022.
165. This second inspection concluded that LFB required improvement across all 3 areas and the report included 46 areas for improvement. We accepted all the HMICFRS's recommendations and returned an action plan outlining how these areas would be addressed in October 2022.
166. Included in these 46 areas for improvement were 2 causes of concern: The first focused on Home Fire Safety Visits (HFSVs). The HMICFRS stated that "The brigade doesn't adequately prioritise HFSVs on the basis of risk. It doesn't have a system in place that allows for the consistent assessment of risk levels among those people it has already identified as being at greatest risk from fire."
167. We now have completed 41 of the 46 Areas for Improvement (AFI) including 2 Causes for Concern that were received in round 2. The HFSV Cause of Concern closed in September 2023 following wholesale change in the allocation and prioritisation of HFSVs and the clearing of the backlog resulting from Covid-19.
168. The second cause of concern focused on culture. The HMI stated that "The Brigade has shown a clear intent to improve the culture of the Brigade, with some staff reporting improvements under the new commissioner. However, more needs to be done. We found evidence of behaviours that are not in line with Brigade values, including discrimination and bullying. Brigade values and behaviours are not always demonstrated by senior leaders." Following the publication of the Culture Review, HMICFRS moved the LFB into enhanced monitoring, known as 'Engage.' We welcomed the support that enhanced monitoring brought as the radical changes were introduced.
169. LFB was taken out of Engage in March 2024, two out of the three recommendations in the Culture Cause of Concern were closed. Over the past year LFB has developed new values in a way that all colleagues now say they recognise, established a Professional Standards Unit, re-written and launched a number of

key policies and processes which reflect the new values and made good progress in delivering a new suite of leadership training for staff at all levels.

170. The HMI will return to LFB to conduct the third full inspection in June/July 2024. Preparation is well underway in the lead up to this next inspection. The report from the third round inspection will be published in November/December 2024.

### **Assurance Declaration**

171. This statement functions as the LFC's Statement of Assurance under the Fire and Rescue Service National Framework. Officers are satisfied that the elements of the LFC's system of internal control meets the requirements of the National Framework. Where recommendations have been made about the LFC's financial and governance and operational assurance arrangements through internal or external assessment, appropriate action plans have been put in place to improve and address these, to make sure that they are adequate and operating effectively.

**Andy Roe KFSM, London Fire Commissioner**

## Annex to the Statement of Assurance – Key evidence of compliance with the National Framework (2018)

Requirement		Compliance Evidenced by (documents/processes)
<b>Section 2: Delivery of Functions; CRMP</b>		
<b>Identify and assess</b>	<ul style="list-style-type: none"> <li>Every fire and rescue authority must assess all foreseeable fire and rescue related risks that could affect their communities, whether they are local, cross-border, multi-authority and/or national in nature from fires to terrorist attacks. Regard must be had to Community Risk Registers produced by Local Resilience Forums and any other local risk analyses as appropriate.</li> </ul>	<ul style="list-style-type: none"> <li>Assessment of Risk</li> <li>Community Risk Management Plan (CRMP)</li> <li>Borough Risk Management Plans</li> <li>National Risk Register</li> <li>London Risk Register</li> </ul>
	<ul style="list-style-type: none"> <li>Fire and rescue authorities 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. Fire and rescue authorities should work through the Strategic Resilience Board where appropriate when determining what arrangements to put in place.</li> </ul>	<ul style="list-style-type: none"> <li>Community Risk Management Plan (CRMP)</li> <li>Service Strategies</li> <li>London Blue Light collaboration</li> <li>National Resilience Arrangements</li> </ul>
<b>Prevent and protect</b>	<ul style="list-style-type: none"> <li>Fire and rescue authorities must make provision for promoting fire safety, including fire prevention, and have a locally determined risk-based inspection programme in place for enforcing compliance with the provisions of the Regulatory Reform (Fire Safety) Order 2005 in premises to</li> </ul>	<ul style="list-style-type: none"> <li>Inspection Programme</li> <li>Home Fire Safety Full Guide (on website)</li> <li>Guide for businesses and organisations (on LFB</li> </ul>

	which it applies.	<p>website)</p> <ul style="list-style-type: none"> <li>Community Risk Management Plan (CRMP)</li> <li>Borough Risk Management Plans</li> </ul>
<b>Respond</b>	<ul style="list-style-type: none"> <li>Fire and rescue authorities must make provision to respond to incidents such as fires, road traffic collisions and other emergencies within their area and in other areas in line with their mutual aid agreements.</li> </ul>	<ul style="list-style-type: none"> <li>Mutual aid agreements (Section 13/16 agreements)</li> <li>Community Risk Management Plan (CRMP)</li> <li>Response Strategy</li> <li>Mobilising and Operational Response policies</li> </ul>
	<ul style="list-style-type: none"> <li>Fire and rescue authorities must, so far as is practicable, enter into reinforcement schemes, or mutual aid agreements, with other fire and rescue authorities for securing mutual assistance.</li> </ul>	<ul style="list-style-type: none"> <li>Mutual aid agreements (Section 13/16 agreements)</li> <li>National resilience assets</li> <li>National operational guidance programme</li> </ul>
	<ul style="list-style-type: none"> <li>Fire and rescue authorities must have effective business continuity arrangements in place in accordance with their duties under the Civil Contingencies Act 2004. Within these arrangements, fire and rescue authorities must make every endeavour to meet the full range of service delivery risks and national resilience duties and commitments that they face. Business continuity plans should not be developed on the basis of armed forces assistance being available.</li> </ul>	<ul style="list-style-type: none"> <li>Strategic Response Arrangements</li> <li>Corporate Business Continuity Policy</li> <li>Capital Guard</li> </ul>
<b>Collaboration</b>	<ul style="list-style-type: none"> <li>Fire and rescue authorities must collaborate with other fire and rescue authorities to deliver interoperability (between fire and rescue authorities) and interoperability (with other responders such as other emergency services, wider Category 1 and 2 responders and Local Resilience Forums) in line with the Joint Emergency Services Interoperability Principles (JESIP). Fire and rescue authorities must collaborate with the National Resilience</li> </ul>	<ul style="list-style-type: none"> <li>National Inter-agency liaison officer – LFB officer</li> <li>Inter-agency liaison offers (ILOs)</li> <li>JESIP</li> </ul>

	Lead Authority to ensure interoperability is maintained for National Resilience assets.	<ul style="list-style-type: none"> <li>▪ NOL/JOL learning</li> <li>▪ Joint statement of intent</li> <li>▪ London blue light collaboration</li> <li>▪ LESLP</li> </ul>
<b>Section 3: National Resilience</b>		
<b>National Resilience</b>	<ul style="list-style-type: none"> <li>▪ Fire and rescue authorities must work with the lead authority to support the national resilience assurance processes in order to ensure capabilities are maintained at a high state of operational readiness. This includes co-operation of fire and rescue authorities, as necessary, on devolved training and, where applicable, on the long-term capability management arrangements.</li> </ul>	<ul style="list-style-type: none"> <li>▪ London Fire Commissioner – National Fire Chiefs Council (NFCC) Strategic Lead for National Security and Counter Terrorism</li> <li>▪ Resilience partnership working with NFCC</li> <li>▪ The Deputy Commissioner for Operational Response and Preparedness is the lead for Marauding Terrorist Attacks (MTA)</li> <li>▪ The Assistant Commissioner for Operational Resilience and Control is the LFB lead for National Resilience inclusive of Urban Search &amp; Rescue (USAR), High Volume Pumps (HVP), Chemical Biological Radiological, Nuclear, explosive discharge (CBRNe) and Mass Decontamination. For National Security and Terrorism the Assistant Commissioner is also the NFCC Counter Terrorism Coordinator inclusive of National Interagency Liaison Officer (NILO) which includes the National Coordination Office, delivery of the NILO foundation and National Control Liaison Officers courses for all services</li> </ul>

	<ul style="list-style-type: none"> <li>Fire and rescue services, through the NFCC's representation on the Fire and Rescue Strategic Resilience Board (FRSRB), must also work with Government to identify and address any national resilience capability gaps identified through ongoing analysis of the National Risk Assessment.</li> </ul>	<ul style="list-style-type: none"> <li>London Fire Commissioner – member of FRSRB</li> <li>Operational Policy Department management and risk assessment of operational policies. The Deputy Commissioner attends National Resilience Board and the Assistant Commissioner for OR&amp;C attends the National Working Group for all National Resilience assets. The Home Office lead Prepare Board and Joint Operational Principles working group (JOPwg) is attended by the Assistant Commissioner OR&amp;C where National Security risk are analysed and decisions taken.</li> </ul>
<b>Gap Analysis</b>	<ul style="list-style-type: none"> <li>Fire and rescue authorities' risk assessments must include an analysis of any gaps between their existing capability and that needed to ensure national resilience (as defined above).</li> </ul>	<ul style="list-style-type: none"> <li>Assessment by National Resilience Assurance Team (NRAT) OR&amp;C represent the LFC to ensure compliance with the National Resilience Assurance process and action recommendations</li> <li>Community Risk Management Plan (CRMP)</li> <li>Assessment of Risk</li> </ul>
	<ul style="list-style-type: none"> <li>As part of their analysis, fire and rescue authorities must highlight to the Home Office or the Fire and Rescue Strategic Resilience Board, any capability gaps that they believe cannot be met even when taking into account mutual aid arrangements, pooling and reconfiguration of resources and collective action.</li> </ul>	<ul style="list-style-type: none"> <li>CONTEST strategy The CT National Coordinator has written the NFCC Fire &amp; Rescue Service Counter Terrorism strategy to ensure clear alignment with the CONTEST strategy. It is committed to joint working with embedded officers in the National CBRN centre and National Counter Terrorism Headquarters to support policy delivery.</li> <li>Home Office/FRSRB review and meetings</li> <li>Mutual Aid agreement (Section 13/16 agreements)</li> </ul>

		and full compliance with National Resilience Fire Control and National Coordination Advisory Framework (NCAF), arrangements.
<b>National Coordination and Advisory Framework</b>	<ul style="list-style-type: none"> <li>The National Coordination and Advisory Framework (NCAF) has been designed to provide robust and flexible response arrangements to major emergencies that can be adapted to the nature, scale, and requirements of the incident. Fire and rescue authorities must proactively engage with, and support, the NCAF arrangements including the NFCC's lead operational role.</li> </ul>	<ul style="list-style-type: none"> <li>Commissioner – member of NFCC</li> <li>LFB support and senior officer secondment for NFCC (and NCAF)</li> </ul>
<b>Response to Terrorist Attacks or Marauding Terrorist Firearms Attacks</b>	<ul style="list-style-type: none"> <li>Fire and rescue services must be able to respond to the threat of terrorism and be ready to respond to incidents within their areas and across England. Fire and rescue services should also be interoperable to provide operational support across the UK to terrorist events as required. Government recognises the critical contribution of fire and rescue services when responding to acts of terrorism. This is an agreed function of fire and rescue services as set out in the National Joint Council for Local Authority Fire and Rescue Services Scheme of Conditions of Service ("the Grey Book") and is encompassed within the broad descriptions within the existing agreed firefighter role maps: to save and preserve endangered life, and safely resolve operational incidents.</li> </ul>	<ul style="list-style-type: none"> <li>The Deputy Commissioner for Operational Response and Preparedness is the lead for Marauding Terrorist Attacks (MTA)</li> <li>MTA agreement in place with representative bodies (MTA)</li> <li>All Operational staff FFs trained to deliver the MTA capability with additional Ballistic Personal Protection, stretchers and Immediate Emergency Care (IEC) provisions.</li> <li>National lead co-ordination of counter-terrorism response including co authoring the MTA Joint Operating Principles for the UK and Concept of Operations for National Resilience. MTA is a key competency area for NILOs and an accessible capability within the Skills for Justice accredited National Foundation Course.</li> </ul>
<b>National</b>	<ul style="list-style-type: none"> <li>Fire and rescue authorities must continue to work collectively and with the Fire and Rescue Strategic Resilience Board and the national resilience lead</li> </ul>	<ul style="list-style-type: none"> <li>Commissioner – member of FRSRB</li> </ul>



<b>Resilience Assurance</b>	<p>authority to provide assurance to government that:</p> <ul style="list-style-type: none"> <li>existing national resilience capabilities are fit for purpose and robust; and</li> <li>risks and plans are assessed and any gaps in capability that are needed to ensure national resilience are identified.</li> </ul>	<ul style="list-style-type: none"> <li>CONTEST strategy</li> <li>National Resilience assets</li> <li>Testing and Exercising programmes – These include Exercise Spring Resolve, Exercise Macroscopic, Exercise Marine Gammer and Exercise Felix Fort as examples.</li> </ul>
	<ul style="list-style-type: none"> <li>Fire and rescue authorities with MTFA teams must work with police forces and ambulance trusts to provide tri-service assurance of this capability.</li> </ul>	<ul style="list-style-type: none"> <li>National Inter-agency Liaison officers (NILO) work closely with CT Policing and other key agencies</li> </ul>
<b>Section 4: Governance</b>		
<b>Managing the Fire and Rescue Service/Chief Fire Officer</b>	<ul style="list-style-type: none"> <li>Each fire and rescue authority will appoint an individual – commonly known as a Chief Fire Officer – who has responsibility for managing the fire and rescue service. This role does not have to be operational but includes managing the personnel, services and equipment secured by the fire and rescue authority for the purposes of carrying out functions conferred on it by the Fire and Rescue Services Act 2004, Civil Contingencies Act 2004, and other enactments. Each fire and rescue authority must hold this person to account for the exercise of their functions and the functions of persons under their direction and control.</li> </ul>	<ul style="list-style-type: none"> <li>Mayor appoints LFC</li> <li>Deputy Mayor for Fire and Resilience (from May 2024 Deputy Mayor for Planning, Regeneration and the Fire Service)</li> <li>Deputy Mayor's Fire and Resilience Board (from May 2024 Deputy Mayor's Fire Board)</li> <li>Fire Resilience and Emergency Planning Committee (From May 2024 Fire Committee)</li> <li>Audit Committee</li> </ul>
	<ul style="list-style-type: none"> <li>The chief fire officer must, in exercising their functions, have regard to the fire and rescue authority's Integrated Risk Management Plan and any set objectives and priorities which may be outlined in a strategic plan. The fire and rescue authority should give due regard to the professional advice of</li> </ul>	<ul style="list-style-type: none"> <li>Mayor approves the CRMP for publication</li> <li>FREP scrutinize the plan</li> </ul>

	the Chief Fire Officer while developing the Integrated Risk Management Plan and when making decisions affecting the fire and rescue service.	<ul style="list-style-type: none"> <li>Community Risk Management Plan (CRMP)</li> </ul>
<p><b>Documents to be prepared:</b></p> <p><b>i) Integrated Risk Management Plan</b></p>	<ul style="list-style-type: none"> <li>Each plan must:</li> <li>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.</li> <li>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.</li> <li>outline required service delivery outcomes including the allocation of resources for the mitigation of risks.</li> <li>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.</li> <li>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.</li> <li>reflect effective consultation throughout its development and at all review stages with the community, its workforce and representative bodies and partners; and</li> <li>be easily accessible and publicly available.</li> </ul>	<ul style="list-style-type: none"> <li>Community Risk Management Plan (CRMP) is on London Fire website, hardcopies on request</li> <li>Assessment of Risk</li> <li>LFB Board Paper <a href="#">LFC0704</a> - has the assessment of risk 2022 that underpins the CRMP and meets the risk assessment requirement for the NF.</li> <li>LFB Board Paper <a href="#">LFC0742</a> - Page 25, section legal comments, para 10.11 sets out where we depart from the National Framework and the legal advice/position on that.</li> <li>sets out in detail and in appendices how we consulted.</li> <li>also has our impact assessments.</li> </ul>

<b>ii) Annual statement of assurance</b>	<ul style="list-style-type: none"> <li>▪ The statement should outline the way in which the authority and its fire and rescue service has had regard – in the period covered by the document – to this National Framework, the Integrated Risk Management Plan and to any strategic plan (e.g., the Fire and Rescue Plan – see 4.10 below) prepared by the authority for that period. The authority must also provide assurance to their community and to government on financial, governance and operational matters. For PCC FRAs, this statement is subject to scrutiny by the Police, Fire and Crime Panel. The name of this statement differs across governance models (e.g., in the case of PCC FRAs it is called the 'Fire and Rescue Statement' and in Greater Manchester the 'Fire and Rescue Declaration').</li> </ul>	<ul style="list-style-type: none"> <li>▪ Statement of Assurance 2023/2024 (this document)</li> </ul>
<b>iii) Financial plans</b>	<ul style="list-style-type: none"> <li>▪ A medium-term financial strategy, an efficiency plan, and a reserves strategy. These can be combined or published separately.</li> </ul>	<ul style="list-style-type: none"> <li>▪ March – LFB Budget submission 2023/2024</li> </ul>
<b>Section 5: Achieving Value for Money</b>		
<b>Achieving Value for Money</b>	<ul style="list-style-type: none"> <li>▪ Fire and rescue authorities must manage their budgets and spend money properly and appropriately and ensure the efficient and effective use of their resources, pursuing all feasible opportunities to keep costs down while discharging their core duties effectively. Fire and rescue authorities should regularly review the numbers and deployment of firefighters and other staff to ensure that their fire and rescue service has a workforce that is commensurate with the risks that they face.</li> </ul>	<ul style="list-style-type: none"> <li>▪ LFC's Scheme of Governance</li> <li>▪ Budget process</li> <li>▪ Quarterly budget reporting and monitoring</li> <li>▪ Performance reporting</li> <li>▪ Recruitment and selection processes</li> </ul>
	<ul style="list-style-type: none"> <li>▪ Fire and rescue authorities must ensure that financial decisions are taken with the advice and guidance of the chief finance officer and that decisions are taken with an emphasis on delivering value for money to the public purse. Fire and rescue authorities should ensure that management of their finances is undertaken with regard to published guidance including those</li> </ul>	<ul style="list-style-type: none"> <li>▪ LFC's Scheme of Governance</li> <li>▪ Treasury management</li> <li>▪ Director of Corporate Services is the LFC's Section 127 Officer and is responsible for safeguarding the</li> </ul>

	set out at Annex B (of the National Framework).	<p>LFC's financial position and ensuring value for money</p> <ul style="list-style-type: none"> <li>▪ PCR 2023 Procurement Act (Go-live 24th February 2025)</li> </ul>
<b>Commercial Transformation</b>	<ul style="list-style-type: none"> <li>▪ Each fire and rescue authority must demonstrate that it is achieving value for money for the goods and services it receives. Every fire and rescue authority should look at ways to improve its commercial practices including whether they can aggregate their procurement with other fire and rescue authorities and other local services (e.g., police) to achieve efficiencies.</li> </ul>	<ul style="list-style-type: none"> <li>▪ GLA Group Collaboration Board (GCB)GLA Collaborative Procurement Board (CPB)</li> <li>▪ NFCC/Home Office/Blue Light Commercial function</li> <li>▪ CCS – Crown Commercial Service pipeline review and synergy oversight</li> <li>▪ LFB Procurement policies and procedures</li> <li>▪ Procurement Improvement Project (PIP)</li> <li>▪ Procurement Act 2023 implementation: training, systems development, processes reviewed</li> <li>▪ New Finance &amp; Purchasing SAP system go-live in Spring 2025</li> </ul>
	<ul style="list-style-type: none"> <li>▪ Fire and rescue authorities must demonstrate and support national and local commercial transformation programmes where appropriate. Each fire and rescue authority should be able to demonstrate full awareness of the objectives to standardise requirements, aggregate demand and manage suppliers of products and services within their commercial arrangements.</li> </ul>	<ul style="list-style-type: none"> <li>▪ ESN programme</li> <li>▪ PPE contract</li> <li>▪ Workwear Contract</li> <li>▪ NFCC/Home Office/Blue Light Commercial function</li> </ul>
	<ul style="list-style-type: none"> <li>▪ Fire and rescue authorities must ensure that their commercial activities, be that the placement of new contracts or the use of existing contracts, is in line with their legal obligations, including but not limited to the Public Contracts Regulations 2015, the Public Services (Social Value) Act 2012, the Modern Slavery Act 2015 and transparency commitments.</li> </ul>	<ul style="list-style-type: none"> <li>▪ LFB Procurement policies and procedures</li> <li>▪ Contracts Management Team</li> <li>▪ General Counsel and legal review of contracts</li> <li>▪ PCR 2023 Procurement Act (Go-live 24 February 2025)</li> </ul>

		<ul style="list-style-type: none"> <li>▪ New Finance &amp; Purchasing SAP system; manage approvals, ordering and spend controls and automated approval hierarchy/delegated authorities</li> </ul>
<b>Trading</b>	<ul style="list-style-type: none"> <li>▪ Fire and rescue authorities must ensure any actions taken in respect of their trading companies are considered against the requirements of competition law. Any financial assistance – in cash or in kind – given by an authority that establishes or participates in it, should be for a limited period, set against the expectation of later returns, and re-paid by those returns. Any assistance should be provided under a formal agreement with the company and must be entered into for a commercial purpose. Before entering into such an agreement, the authority should satisfy itself that it will achieve its objective, and the company should satisfy itself that it will meet its objective in terms of its business plan. The parties should consider any State Aid implications and obtain their own expert advice where necessary.</li> </ul>	<ul style="list-style-type: none"> <li>▪ LFB – currently dormant</li> </ul>
<b>Section 6: Workforce</b>		
<b>Fitness principles</b>	<ul style="list-style-type: none"> <li>▪ Fire and rescue authorities have an important role in helping to ensure their firefighters remain fit and are supported in remaining in employment. Each fire and rescue authority must comply with the fitness principles set out at Annex C (of the National Framework).</li> </ul>	<ul style="list-style-type: none"> <li>▪ Fitness policy</li> <li>▪ Wellbeing Strategy</li> </ul>
<b>Re-engagement of Senior Officers</b>	<ul style="list-style-type: none"> <li>▪ Fire and rescue authorities must not re-appoint principal fire officers after retirement to their previous, or a similar, post save for in exceptional circumstances when such a decision is necessary in the interests of public safety. Any such appointment must be transparent, justifiable and time limited.</li> </ul>	<ul style="list-style-type: none"> <li>▪ LFB recruitment policies</li> <li>▪ Culture Transformation Programme (Leadership Model of Trust)</li> </ul>

	<ul style="list-style-type: none"> <li>▪ To ensure greater fairness and the exchange of talent and ideas, all principal fire officer posts must be open to competition nationally, and fire and rescue authorities must take account of this in their workforce planning.</li> </ul>	<ul style="list-style-type: none"> <li>▪ LFB recruitment policies</li> <li>▪ LFB principal officer posts - advertised externally</li> <li>▪ Culture Transformation Programme (Leadership Model of Trust)</li> </ul>
<b>Section 7: Inspection, Intervention and Accountability</b>		
<b>Inspection</b>	<ul style="list-style-type: none"> <li>▪ All fire and rescue authorities must cooperate with the inspectorate and its inspectors to enable them to deliver their statutory function. This includes providing relevant data and information to inform inspections. The Home Office and HMICFRS will work together to align data and information collections where possible to avoid duplication.</li> </ul>	<ul style="list-style-type: none"> <li>▪ HMICFRS Liaison Team</li> <li>▪ Provision of data to HMICFRS by Information Management</li> </ul>
	<ul style="list-style-type: none"> <li>▪ Fire and rescue authorities must give due regard to reports and recommendations made by HMICFRS and – if recommendations are made – prepare, update, and regularly publish an action plan detailing how the recommendations are being actioned. If the fire and rescue authority does not propose to undertake any action as a result of a recommendation, reasons for this should be given. When forming an action plan, the fire and rescue authority could seek advice and support from other organisations, for example, the National Fire Chiefs Council and the Local Government Association; and, for those areas where a PFCC has responsibility for fire governance, the Association of Police and Crime Commissioners.</li> </ul>	<ul style="list-style-type: none"> <li>▪ LFB's HMICFRS inspections</li> <li>▪ GTI/HMICFRS action plan</li> </ul>
<b>Accountability</b>	<ul style="list-style-type: none"> <li>▪ Each fire and rescue authority must hold the individual who has responsibility for managing the fire and rescue service – an operational or non-operational Chief Fire Officer – to account for the delivery of the fire</li> </ul>	<ul style="list-style-type: none"> <li>▪ Deputy Mayor for Fire and Resilience (from May 2024 Deputy Mayor for Planning, Regeneration and</li> </ul>

	<p>and rescue service and the functions of persons under their direction and control. In London, the Mayor of London must hold the London Fire Commissioner, as fire and rescue authority for Greater London, to account for the exercise of the Commissioner's functions.</p>	<p>the Fire Service)</p> <ul style="list-style-type: none"> <li>▪ Fire, Resilience and Emergency Planning Board meetings</li> <li>▪ Deputy Mayor's Fire and Resilience Board (from May 2024 Deputy Mayor's Fire and Rescue Board)</li> <li>▪ Delegated authority arrangements</li> <li>▪ Committee/Board constitution/Terms of reference</li> </ul>
<b>Transparency</b>	<ul style="list-style-type: none"> <li>▪ Each fire and rescue authority must comply with their statutory transparency requirements. The nature of the requirements is dependent on the legal basis of the authority; for example, combined fire and rescue authorities would be subject to the Local Authority Transparency Code 2015 while PCC FRAs must comply with requirements under section 11 of the Police Reform and Social Responsibility Act 2011 and the Elected Local Policing Bodies (Specified Information) Order 2011. All fire and rescue authorities should therefore publish certain information, including senior salaries; register of interests; staffing; income and expenditure; property; rights and liabilities; and decisions of significant public interest. Fire and rescue authorities must make their communities aware of how they can access data and information on their performance.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Data and transparency arrangements - London Fire Brigade</li> <li>▪ London Datastore</li> </ul>