



LONDON FIRE BRIGADE

Report title

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## Command Unit Watch Integration Project

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Report to

Commissioner's Board  
Deputy Mayor's Fire and Resilience Board

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AC Fire Stations

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### Summary

As part of the London Safety Plan (LSP), the Brigade made a commitment to look at the use of the Command Units (CUs) to:

1. Establish a more efficient integrated staffing model
2. Ensure that CUs are staffed by crews at the integrated station
3. Establish a revised staffing model that should create opportunities for Firefighters (FFs) and officers to develop additional skills and offer promotion opportunities
4. Make the CU role accessible to a wider pool of staff at all ranks
5. Review the training provided to the personnel that will crew CUs.

### Recommended decisions

That the London Fire Commissioner:

1. Approves the relocation of seven CUs to new integrated locations as set out in this report, with one CU to remain located at Richmond Fire Station on the new integrated model.
2. Approves the eighth CU to be crewed strategically at the London Operations Centre (LOC) using staff from the seven CU stations on a pre-planned rotational basis
3. Delegates the implementation of the Command Unit Integration Project (CUIP) to the Assistant Commissioner for Fire Stations
4. Approves the net additional investment of up to £813 kpa from 2021/22.

### Introduction and background

1. There have been no major changes in the working practices of the CUs for over ten years. The last major review of the CU function started a project in 2015 and reported in June 2017.

The main aims of that project were to:

1. Provide enhanced command support (CU) at incidents by increasing the number of staff crewing the CUs;

2. Provide options for a CU Integrated Watch Structure (CUIWS);
  3. Identify savings of £1m through reducing the number of CUs from eight to five (with a sixth unit available for spare conditions);
  4. Improve the resilience of the staffing model and to ensure the maintenance of operational competency for CU staff.
2. This project was put on hold following the fire that occurred at Grenfell Tower in June 2017, as it was considered that a further review was required, and the original options proposed should be re-evaluated.
  3. The second review reported to the Commissioner's Board on 31 July 2019 and recommended a reduction in the number of CUs and proposed options for different crewing arrangements. The Commissioner's Board considered this report and its recommendations and asked for further work to be carried out. Subsequent discussions were then held between officers.
  4. It was agreed by the former Commissioner Dany Cotton and the former Deputy Commissioner for Operations Tom George on 15 August 2019 that the Role-to-Rank (R2R) project team would now be responsible for delivering any proposed changes to the CUs, such as integrating the CUs onto watches; remove the specialist role from the CUs and convert the CU role into an operational role, in line with the 2019 R2R Agreement. The R2R project team were provided with a set of objectives by the Commissioner's Board to implement and were given clear direction for the CUIP.

**The R2R project team were provided with the following set of objectives:**

1. The number of CUs are to remain at eight;
2. To locate one CU at the London Operations Centre (LOC)
3. Full integration of CU staff with watch-based station personnel should be implemented
4. A minimum rank of Sub Officer (Sub O) to be the team leader (TL) and ride in charge of the CU
5. Increase the minimum crewing level from two to three CU qualified staff
6. The removal of the specialist officer positions from the CU structure and develop existing CU specialist officers to an operational role
7. To optimise CU attendance times
8. Consider locating CUs at one appliance stations to increase the Station Officer (Stn O) establishment, providing further resilience at the Stn O rank
9. No CUs should be located at Fire Rescue Unit (FRU) Stations
10. Remain within the existing revenue costs where possible.

The review should also consider:

1. Reducing CU staff standbys
  2. Providing additional capacity for CU reliefs at incidents
  3. The possibility of using support pumps at stations where CUs are based as command support pumps
  4. Provide a definable career pathway from Firefighter (FF) to Stn O for CU staff
5. This report sets out options to meet previous and current commitments regarding CUs with a recommendation that fulfils the integration requirement; provides the necessary development and promotional opportunities and improves resilience and efficiency. In particular, the review has looked at improving career progression and development opportunities, options to remove the specialist role classification, provide improved resilience and greater support through increased command and control at incidents; improve training and joint working between CUs and the LOC and align the improvements to the outcomes of the Grenfell Tower Inquiry Phase One report.

## **Command Units (CUs)**

6. There are currently eight CUs based at Barking, Islington, Wembley, Woodside, Richmond, Fulham, Lewisham, and Edmonton. These eight CUs are all crewed by specialist Sub Os and are not integrated into the watch structure.
7. CUs are the critical link between the incident ground Incident Commander (IC) and the LOC. The senior control room staff, namely the Operations Manager (OM) and Assistant Operations Managers (AOMs) maintain a critical information line that is usually connected to the CUs at the incident ground, to allow communication of “risk critical” or “life risk critical” information by a direct line known as the “red phone”.
8. OM and AOMs also have access to the dedicated direct link to the National Police Air Service (NPAS) helicopter via an intercom radio system, which can be used to provide additional information to the CUs. This function provides an overview of the incident and a visual image that can prove to be vital to gaining situational awareness for both the LOC and CUs.
9. At the initial stages of an incident, the command and control functions will be set up via an Incident Command Pump (ICP). The ICP will be responsible for performing its communications role until the incident is concluded or a CU relieves it if the incident requires one. On arrival at the incident ground, commanders of appliances and senior officers alike report to the ICP or the CU, hand in their nominal roll boards, and are given information about the incident.
10. A CU is mobilised to provide a dedicated and enhanced level of command support at larger incidents (typically those involving four or more appliances). At least two Sub Os provide command support for the IC on each CU. The CU is equipped with the Command Support System (CSS), together with other systems which are designed to provide the IC with access to the Operational Risk Database ORD, the primary purpose of which is to record significant hazards and risks, as well as less obvious hazards and any unique control measures in place and any particular tactical plans or command and control procedures that may be required. The CSS also carries other relevant information, such as data on water supplies and maps.
11. The officers on the CU perform several important functions. These include recording preliminary details of the incident on the CSS; transmitting messages to and from the LOC; and maintaining the plan of the incident, including a record of the duties and location of senior officers and operational crews committed at the incident. The CUs also play an important role in ensuring that the IC can communicate with the various parts of the incident ground. They should maintain radio contact with the IC if they leave the CU, and co-ordinate and maintain radio contact with the operations and sector commanders. CUs can also be used for logistical functions, such as marshalling and hosting tactical co-ordination group (TCG) meetings.
12. At larger incidents, additional CUs will automatically be mobilised, but they can, if necessary, be requested by the IC. When the LOC is receiving Fire Survival Guidance (FSG) calls, an additional CU will automatically be mobilised, together with a senior officer as part of a pre-determined attendance, to collate and manage FSG information. Each CU is equipped with a Casualty Information Sheet (CIS) a laminated template that enables information to be recorded in respect of up to seven FSG calls. The LFB’s fleet of CUs also carries portable Ultra High Frequency (UHF) radio repeaters and what is known as “leaky feeder” equipment. Their arrival during the early stages of incidents and the facilities they provide make them a valuable resource for other emergency services, enhancing interoperability at incidents.
13. The Brigade currently has eight CUs, which are crewed by specialist Sub Os; the establishment is three Sub Os per watch. The CUs operate with a minimum crewing level of two and a maximum crewing level of three. However, because there is no ridership factor applied to the CU

establishment, the CUs often ride with only two Sub Os making up the crew. The review in 2015 found that ICs and CU staff recognised that the crewing level of two Sub Os was not sufficient to provide the level of support required.

### **Drivers for change**

1. The need to review the crewing level of CUs and increase the number of trained CU staff
2. Due to the uncertainty regarding the future of the CU fleet, there is a reluctance for officers to transfer or be promoted onto the CUs
3. Once promoted or transferred to a CU position it has proved difficult to be released from the CU due to establishment and skills issues
4. CU staff have found it difficult to maintain their operational competence while assigned to a CU
5. CU staff are unable to be in charge of an incident or be in charge of a watch under current Brigade practices and procedures
6. CU staff have had limited opportunity to demonstrate competency against the full operational role map for their rank which in turn has impacted their promotion prospects and eligibility for promotion
7. Making the CU role accessible to more staff at Firefighter (FF), Leading Firefighter (LFF), Sub O and Stn O ranks rather than just 96 specialist Sub Os
8. The CU establishment has decreased over the last four to six years and there is a high probability that further experienced CU staff will retire in due course
9. The need to review the training provided to CU crews and meet the recommendations of the Grenfell Tower Inquiry report Phase one report.

### **Alignment with the Transformation Delivery Plan**

14. The CUIP addresses key issues that have been identified in the Grenfell Tower Inquiry Phase One report and the recommendations from the HMICFRS inspection report on London Fire Brigade. The CUIP aligns with the Transformation Delivery Plan (TDP) and the pillars within the plan.

### **Strategy The best people and the best place to work (Talent and Learning)**

15. The CUIP will ensure that all CU staff are trained and provided with training to deliver prioritised actions from the independent training review and provide more realistic and continuous training for incident commanders and CU crews. The CUIP will develop, improve, and maintain core skills for all operational staff, implement Continuous Personal Development (CPD) for CU staff. The CUIP team will work with Operational Policy to review the high-rise response and the use of CUs at incidents that have Fire Survival Guidance (FSG) calls in progress. The CUIP team are working to achieve an outcome that will see CU staff as the best people for this role and work at the best place by 31 March 2021.

### **Strategy: Seizing the future (Challenge and Transform)**

16. The CUIP team are working with the London Region Fire Brigades Union (FBU) to positively engage with the representative bodies in the transformation of CUs, to deliver an integrated CU function onto watches and locate one CU at the London Operations Centre (LOC), this will be achieved by the 31 March 2021.

### **Strategy: Delivering excellence (Constantly Improving the effectiveness of our service)**

17. The CUIP team are working with the Assistant Commissioner responsible for Control to coordinate the CU integration project with the Implementation of the five-year improvement plan for control. The CUIP team are specifically, working towards the creation of a mechanism for deploying control officers on the CUs to incidents. The CUIP team are working with control staff to provide a framework for the operational deployment of control officers on the CUs. Joint training between CU staff and control staff should also include the provision for control officers to assist with the training of CU staff this will be achieved by 31 March 2021.

### **Strategy: Delivering excellence (Improved execution)**

18. The CUIP team are working towards achieving Increased reliability and consistency of support to incident commanders, enhancing capability and professional competency in incident command by spreading the learning across a wider operational staff group. Reduce the ongoing staff costs that are currently dependant on utilising pre-arranged overtime (PAO) to maintain the CU function. Fully implement the CUIP project by 31 March 2021 to increase efficiency and drive down the ongoing staff costs and lack of resilience within this critical function.

### **Benefits of integration**

1. Integration into the watch structure will provide benefits for training staff, including but not limited to operational maintenance of skills lectures and station daily routines
2. This integration places each of the Brigade's CUs firmly within the line management structure for Station and Borough based officers
3. Reaffirming the line management structure for the CUs, placing them under the line management of Assistant Commissioner (AC) Fire Stations, Area Deputy Assistant Commissioners (DACs), Borough and Station Commanders
4. The number of CU trained staff will rise from the current level of 96 and increase to between 244 and 256 trained staff providing greater resilience
5. Upskilling the workforce and making the role more accessible
6. CU staff will no longer need to be detached out to stations to maintain their operational competencies
7. It creates a development platform for aspiring officers providing a wider understanding of incident command and will assist with career development and promotion opportunities
8. Locating a CU at the LOC will provide an opportunity for all CU staff and LOC staff to train together at one location.

### **Proposed model for integration**

19. Several options for delivering integration have been considered. The following proposal is considered to best meet the objectives set out in [paragraph four](#) above.
20. The proposal is to fully integrate the CU crews into the station and watch structure enabling staff to maintain their full operational role map and to continue to attain operational and command experience from crewing both the CU and the pumping appliance at that station (similar to the FRU model). This also means that should a Sub O at a CU station seek promotion to Stn O, they will not have to first be transferred onto a pumping appliance to fulfil their operational role map, providing a clear route for career progression and skills maintenance.
21. The three Sub O posts that currently crew the CUs are replaced with one Stn O (due to the increased establishment of the watch), one LFF and two FF under option A ([detailed in paragraph 79](#))
22. Under the recommended option B ([detailed in paragraph 80](#)) the three Sub Os posts that currently crew the CUs are replaced with one Stn O (due to the increased establishment of the watch) two LFFs and one FF.
23. It is proposed that the minimum crewing level on the CUs is increased to three, addressing concerns about the capacity of CUs when crewed with two officers, particularly at the early stages of an incident. With the current crewing arrangements, each CU arrives at the incident with two staff; under the integrated model, each CU would have a minimum ridership of three staff.
24. It is also recommended to integrate using a ridership factor of 1.4, applying the same ridership factor to the crew of the CUs as to the pumping appliance crews, to ensure that when integrated, the ridership factor is consistent across the watch

25. It is recommended that a review of CU Pre Determined Attendances (PDA's) should be carried out following the implementation of the CUIP to establish if any changes could be made to the current CU PDA's.
26. Whilst there are no reductions to the establishment because of the proposed integration, the number of staff with CU skills will be increased to between 244 and 256 trained staff at CU stations will be trained and able to crew both the pumping appliance and the CU, creating support pumps for CUs and increasing the number of operational staff with CU skills above the current 96.
27. Once the integration has been completed and the staff based at the new stations have received their training, this will see a significant increase in the number of trained CU staff in attendance at incidents, whether riding a pumping appliance or CU. This will give greater flexibility and resilience for ICs to deploy crews effectively to resolve incidents whilst also allowing CUs to be released from the incident more efficiently.
28. The proposal for the integration model has been refined to look at two options for locating and crewing the eighth CU:

#### **Option A**

To provide an established crew and CU based at the LOC with the other seven CUs based at single appliance stations.

#### **Option B**

To provide a CU crewed strategically at the LOC using staff from the seven CU stations on a pre-planned rotational basis.

29. Option B is recommended as the preferred crewing option because it provides the greatest resilience out of both options A and B and is the most cost-effective. Both options provide the Brigade with an efficient response based on current demand as well as providing additional resilience should demand increase.
30. At previous protracted incidents, i.e. Kenley flooding, Grenfell Tower and Wanstead Flats, the CUs have remained at the scene for extended periods. There have been situations where it has been difficult to switch the CU due to constraints of the incident, as well as a loss of services such as the CSS during handover. Using the strategically crewed CU staff (CU support pump) for protracted incidents would give greater flexibility as crews could be relieved via pumping appliances and not just CUs.

#### **Integration**

31. The integration will result in the CU normally being crewed by a minimum of a Sub O, LFF, and a FF. The Station's staff, namely the Stn O, Sub O, all LFFs and four FFs that hold a motor driver (MD) qualification will all be trained to ride the CU allowing staff to ride both the Pump Ladder (PL) and the CU. FF/MDs that hold the CU qualification that want to volunteer to act up to LFF would be able to access the LFF rank, as they would have been trained in the CU qualification.
32. It is apparent that there are some CU staff who were previously redeployed onto the CUs by way of reasonable adjustment, because they may have been considered to have a disability under the Equality Act 2010. By the go-live date of integration, all CU staff will need to be operationally fit to ride both appliances on the integrated watch (CU and PL). CU staff unable to meet operational requirements for health reasons following integration, will be reviewed on a case by case basis, in consultation with occupational health and the Wellbeing Team, to seek to redeploy these staff into suitable posts.

33. It is accepted that those CU staff who are closer to their intended retirement date, and who have not been operationally competent for several years, may have some difficulties and possible reluctance in reaching the required operational standards. It is proposed that where staff have submitted a notice of retirement to take effect on or before 31 May 2021, they will not be required to undertake operational development to become an operationally competent Sub O, and will be able to remain with the CU, on the integrated watch, riding as a SubO(D) (or an LFF if that is their preference), however, this may be on either the CU or the PL. They will retain their current level of pay on a protected basis for the duration of their notice period.
34. Each watch establishment at the seven CU locations will be increased by four staff with a minimum crewing of three for each CU. This would result in 244 staff (option A) being trained in the CU qualification or under (option B) 256 staff being trained which provides greater resilience. This will reduce the number of standby moves to maintain CU availability and if a CU station does not have sufficient riders for all the appliances, then the nearest standby can be sought.
35. The intention is to integrate CUs in phases due to the complexities of the potential staff moves and establishment changes that will be required. It is expected that expect Richmond, Plaistow, Dockhead and Mitcham fire stations will be integrated in phase one. Phase two would see the remaining CUs being moved to their new locations Holloway, Park Royal and Forest Hill taking up their new locations. Phase three would be relocating the CU to the LOC, as this move will require further scoping and property work to be carried out.
36. The planned integration model is to move the CUs to the new locations as soon as possible with the existing trained staff, which would allow them to assist the new station personnel in learning the CU role. It also puts a CU at the new locations so once the staff are trained, they will have access to the CU and software to familiarise themselves and gain immediate experience. The existing Sub Os would be held against the newly established LFF and FF posts until station personnel at new locations are trained and the CU Sub Os can be released to other vacancies.
37. Upon the implementation of the CUIP s, this will allow the CU Sub Os to progress with their operational personal development records (PDRs). This will facilitate their return to operational competency, as they would have access to station training whilst other station personnel are trained in the CU skills.
38. Existing CU staff have completed a staff survey to identify their preferences regarding the CU integration onto watches. The survey will be used to reduce where possible the need for compulsory transfers.
39. Further discussions with the FBU are taking place regarding the establishment and potential relocations of staff when the CUs are relocated. At this stage, compulsory transfers cannot be ruled out. The CUIP team will work jointly with the affected individuals and FBU to consider all options for those CU staff who could be required to transfer to a new location.

### **Locating a CU at the London Operations Centre (LOC)**

40. As part of the LFB's Control Improvement Plan (CIP), better utilisation of LOC officers and creating more sophisticated opportunities for joint training with CU staff will help facilitate more consistent and effective lines of communication between the LOC and the incident ground. As recent significant incidents have highlighted, particularly Grenfell Tower, the need to improve two-way communication between the LOC and front-line crews and officers is clear.
41. Creating the opportunity for both structured and ad hoc training between LOC staff and CU staff by relocating a CU to the LOC will significantly improve LFB's ability to meet these improvement

requirements. Having a CU at the LOC will develop much closer working relationships between CU crews and LOC staff as shared learning becomes the norm.

42. The proposed move will also be part of a staged approach to utilising the specific skill sets of LOC staff on the CUs at the incident ground. The first stage of that process will be to locate a CU at the LOC and begin to embed joint training and working into business as usual activity. This will then create the opportunity to reconfigure the shift system and rank structure in the LOC so that it better reflects current needs and crucially, facilitates the operational deployment of LOC officers onto the incident ground.
43. Embedding joint working and training will help ensure the Brigade provides more timely, accurate, and consistent operational messages. It is then anticipated that this approach will improve Brigade response, provide greater situational awareness in the LOC, and provide a more accurate audit trail for key decisions.
44. The transfer of risk critical information between the LOC and the incident ground; particularly in relation to FSG has been identified as an area for improvement by the LFB's Grenfell Tower investigation team and the Grenfell Tower Inquiry. Through the permanent location of a CU at the LOC, joint training will become the norm, information transfer will improve, and LOC officers will be able to better utilise their skills.
45. An additional benefit of co-location is that it often facilitates the generation of new ideas as different teams come together to share knowledge and experience. Changing the ridership of the CUs to allow FFs, LFFs and Sub Os to ride the CU will help increase the inclusion and diversity of CU staff. Opening up opportunities for all staff to ride the CU will assist with the Transformation Delivery Plan and Strategic Framework. The LOC can accommodate a CU with relative ease and some alterations to accommodate CU staff. The proposed move represents a significant opportunity to change operating protocols to help deliver the improvements in front line emergency communications highlighted in the Grenfell Tower Phase one report. It would also support enhancements to training through additional opportunities created by co-location and promote more effective joint working.

### **Modelling options requested**

46. A modelling request was submitted by the Brigade to Operational Research and Health (ORH) to support work to identify the most suitable CU locations. Once a decision is taken to proceed with the recommended proposals further detailed station audits will be required to produce an estimate for any building or accommodation changes.
47. To meet the LSP commitment to review the use and crewing arrangements for CUs the LFB decided to model its CU appliance locations and to review current locations against optimum locations. ORH was commissioned to undertake the modelling and to report on the findings.

### **Approach to optimum locations**

48. When considering the optimum locations for the CUs several factors were considered
  1. Maintain the current number of CUs at eight
  2. Locate one CU at the LOC
  3. Locate seven CUs at one appliance stations
  4. Minimise any property costs that might be required
  5. Locate CUs at stations that could accommodate the new replacement CU
  6. Minimise staff transfers where possible
  7. Optimise CU attendance times to incidents (if possible)



8. Remove CUs from FRU stations do not relocate other appliances such as FRUs/Aerials to accommodate a CU.
49. Locating CUs at the seven one appliance stations will increase the establishment at these stations creating an additional 28 Stn O positions. The additional 28 Stn O positions will provide additional operational cover across the Brigade.
50. All FRU stations were removed from the modelling as these stations have an enhanced minimum training requirement of 50 per cent and therefore there is no further capacity to maintain the required CU skills. Any station that already had alternate crewing arrangements in place for other appliances and stations that were unable to accommodate the size of the replacement CU were discounted.
51. There several different options available and as part of the review, ORH has modelled optimal CU locations based on specified sets of different criteria.
52. The modelling considered normal CU incident types and current demand to show optimum CU locations regardless of whether there was station capacity bay availability for a CU. As part of the deployment summary within the modelling, the current CU locations were requested to be included within the risk coverage, i.e. modelled at current locations to provide the current average attendance times (Base).
53. The following data has been taken from the ORH report on the deployment summary:

*Modelled options:*

1. Optimum locations for eight CUs (Base no restrictions)
2. Current locations for eight CUs
3. Optimum locations for seven CUs at single appliance stations and one CU based at the LOC.

**Attendance time data**

Options	Minimum Borough Attendance Time	London Wide Attendance Time	Maximum Borough Attendance Time
1	05:35	14:23	25:37
2	06:44	14:53	26:13
3	06:44	15:29	26:13

**Current and modelled optimum CU locations**

8 CUs at any location no restrictions	Current location of our 8 CUs	7 CUs at any location no restrictions, 1 CU located at the LOC	7 CUs at suitable locations, 1 CU located at the LOC
Tottenham	Edmonton	Tottenham	Relocates to the LOC
Poplar	Islington	LOC	Holloway
Ilford	Barking	East Ham	Plaistow
Lee Green	Lewisham	Lee Green	Dockhead
Norbury	Woodside	Norbury	Forest Hill
Heston	Richmond	Heston	Richmond's CU will remain at

8 CUs at any location no restrictions	Current location of our 8 CUs	7 CUs at any location no restrictions, 1 CU located at the LOC	7 CUs at suitable locations, 1 CU located at the LOC
			Richmond Fire Station. (Modelling suggest Chiswick) (Professional discretion has been applied)
Wembley	Wembley	Wembley	Park Royal
Soho	Fulham	Soho	Mitcham

### Outcomes from the modelling

54. As shown above, with eight CUs across London at the current stations, there is an average attendance time of 14:53. With seven CUs and one CU located at the LOC, there is an average attendance time of 15:29 an increase of 00:36 seconds London wide. The maximum Borough attendance time remains the same at 26:13, so there is no impact on the maximum time to Borough by reducing from eight CUs to seven CUs at single appliance stations. The eight CU based at the LOC provides additional capacity during periods of high demand.

### Analysis and recommendations

55. The proposed changes with seven CUs and one CU based at the LOC following the implementation of the CUIP (see CU Relocations Table below) will provide the LFB with a full Command Support Team (CST) consisting of three fully trained staff in one of the fastest average response times in England. LFB would also have the largest number of specialist trained CST officers in England.

### CU relocations Table

	Current Location	New Location	Station Type
1.	Barking	Plaistow Fire Station	One Appliance (PFI)
2.	Islington	Holloway Fire Station	One Appliance
3.	Wembley	Park Royal Fire Station	One Appliance
4.	Woodside	Forest Hill Fire Station	One Appliance and Aerial (ALP)
5.	Richmond	Richmond's CU will remain at Richmond Fire Station. (Modelling suggest Chiswick) (Professional discretion has been applied)	One Appliance
6.	Fulham	Mitcham Fire Station	One Appliance (PFI)
7.	Lewisham	Dockhead Fire Station	One Appliance (PFI)
8.	Edmonton	Relocates to the LOC	LOC

56. One CU will remain at its current location (Richmond) although the modelling would suggest that this should be relocated to Chiswick fire station, it is considered that there would be little benefit in moving this CU to a neighbouring station ground to achieve minimal improvements in the attendance times when balanced against the disruption this could cause to staff and potentially additional property costs. Adopting this approach also aligns with the Brigade's equity of cover principle; providing the fairest approach to the distribution of CUs.

57. The option of allowing Richmond's CU to remain at its existing location will have little or no impact to FFs in terms of their welfare, as no staff moves will be necessary at this location.

58. Property services have been consulted and stated that the building works for moving the remaining CUs and any accommodation for staff at the new CU locations is sufficient. Further work and site surveys will be required to fully cost the accommodation requirements at the LOC. When balanced against the benefits in training and resilience this proposal brings, it is asserted that this would be money well invested and would go a long way to meeting the revised and more resilient training of CU staff with LOC staff and the future benefits this will bring.
59. The relocation of the CUs also brings additional benefits in delivering more efficient use of the Brigade's property portfolio. Three CUs would be relocated to Private Finance Initiative (PFI) stations Plaistow, Mitcham, and Dockhead. One CU Richmond would remain at its current location.
60. It is recommended that seven CUs and one CU be based at the LOC be considered as sufficient for the Brigade's needs.
61. In light of the average attendance times based on historic data, there seems little to be gained from setting an attendance standard. There is good overall response time to incidents for CUs and current performance does not represent a concern. Additionally, no other specialist appliance has an attendance standard in place, and so setting one for CUs would set a precedent.
62. As part of the CU review, officer requirements for CUs have been considered in line with LSP. Following consultation with the FBU, the minimum rank to be in charge of a CU is recommended to be a Sub O. This represents no real change, where a CU had a Watch Manager (A) (Specialist) in charge.

### **Establishment costs**

63. Integrating CUs into the operational workforce and ensuring the sustainability of this function both now and in the future whilst also increasing the minimum ridership of CUs from two to three staff would present a significant increase in annual salary cost of up to approx. £1.5m based on option A.
64. The increase to the minimum ridership allows the Brigade to make full use of current and future technology available via the CU replacement project. Introducing three riding positions of varying ranks allows each team member to have defined, distinct roles at an incident.
65. The aspiration is to maintain the current level of availability of eight CUs for operational deployment whilst also bridging the gap between the incident ground and the LOC to ensure this vital line of communication functions effectively.
66. One consequence of integrating CUs into normal watch structures is that the cadre of officers and FFs riding these appliances will no longer be identified as "specialist" officers from the point of view that they will maintain competencies across the full operational role map appropriate to their ranks as well as the specialist capabilities linked to the CU function.
67. To compensate for the potential for the factors in paragraph 61 above, which may lead to skills fade, a model of crewing the eighth CU at the LOC using officers and FFs from the seven fire station based CUs undertaking on shift detachments has been developed and is detailed and costed in [\(option B, paragraph 89\)](#).
68. Under option, B officers and FFs will undertake detachments for a complete tour at a time (four duty shifts comprising of two days and two nights). Staff will be able to plan for their detachment to the LOC in advance and have options to choose their means of travel. Whilst at the LOC they will complete all Development and Maintenance of Operational Professionalism (DaMOP)

elements relating to their CU role along with an agreed programme of assisting and taking part in Brigade exercises and LOC familiarisation.

69. Whilst undertaking detachments at the LOC these staff will ride the eighth CU which will be available for deployment or “standing up” in the event of specific, and to be agreed, incidents such as major incidents, multiple FSG calls, standing up the Brigade Coordination Centre (BCC) or spate conditions.
70. Option B will avoid the risk of staff posted to the LOC (as a watch of one Sub O, one LFF and two FF) not being able to maintain operational competencies and therefore experiencing the same career progression and establishment issues that have led to the challenges currently experienced within the current CU model. A permanently crewed CU (under option A) at the LOC would also in effect be creating a specialist post, which is the very situation we are trying to prevent. This CU would also not be self-sufficient when factoring in leave entitlement and would generate a CU standby requirements.
71. Option B using existing operational CU staff detached in for pre-planned and structured periods will also realise a significant cost reduction compared to option A Based on current annual unit costs, the cost reduction is approx. £700k.
72. Once option B is established this new system for ensuring the ongoing competence and development of CU officers, as well as the continued availability of all eight CUs, will enable the detached officers to jointly train with LOC staff.
73. Option B also ensures that all CU skilled staff and LOC staff train together and avoids the situation under option A where CU staff based at the LOC would only have the specialist skills that we would want all CU staff to hold and be familiar with across all seven CUs.

#### **The future establishment of CU trained staff (Under option B recommended)**

	CU1	CU2	CU3	CU4	CU5	CU6	CU7	Total
Stn O	4	4	4	4	4	4	4	28
Sub O	4	4	4	4	4	4	4	28
LFF	12	12	12	12	16	12	12	88
FF	16	16	16	16	16	16	16	112
Total	36	36	36	36	40	36	36	256

#### **Establishment and unit costs for a fully crewed CU at the LOC (Under option A not recommended for illustration purposes only)**

Rank	Unit Cost (£)	Establishment per Watch	Total Establishment	Total costs (£)
Sub O	59,377	1	4	237,508
LFF	56,038	1	4	224,152
FF	50,802	2	8	406,416
Total				868,076

#### **LOC crewing system utilising all CU trained staff**

Shifts requiring cover	Total shifts per officer	Total tours per officer (rounded to complete tours)	Total shifts covered
730 Shifts for Stn O or Sub O	13	4	896
730 Shifts for LFF	9	2	704

730 Shifts for FF	7	2	896
2,190 total shifts requiring cover	N/A	N/A	2,496

1. Option B will provide a crew of three consisting of either a Stn O, LFF and FF per shift
2. Each Stn O and Sub O spending four tours per year at LOC (one tour per quarter), each LFF, and FF spending two tours per year at the LOC (one tour every six months) costing £180k per year in allowances.

### **Recommendation**

74. At Borough, level both options A and B provide the best London-wide coverage, however, option A comes with a significant ongoing salary increase of approx. £1.5m to provide an established crewing model at the LOC. Additional funding would have to be sought and a business case developed further to support this option.
75. Both options A and option B create 28 additional Stn O positions by locating CUs at single appliance stations providing additional resilience at the Stn O rank.
76. One CU will remain at its current location (Richmond) and this reduces the impact for current CU staff and property costs. Integration at four of the stations can start immediately with minimal delays (Plaistow, Dockhead, Mitcham, and Richmond). Three Private Finance Initiative stations (PFI) will be utilised at Plaistow, Mitcham and Dockhead maximising their use with minimal property costs.
77. Training for CU staff and LOC staff can be facilitated more easily at the LOC under option B and this has been fully supported by the AC responsible for the LOC.
78. The recommended option B provides greater resilience at the LFF rank and will reduce the requirements for FFs to volunteer to act up to LFF to cover the LFF position on the CU. The current leave requirements only allow either the Stn O or Sub O to be absent, they are not allowed to be absent at the same time. However, two LFFs could be absent at the same time and this would generate a LFF standby or a FF could volunteer to act up. The increase in the additional LFF position under option B provides greater resilience and reduces the need for a FF to act up.

### **Establishment (options)**

#### **79. Option A**

The station establishment at single appliance stations under option A would change to:

1. One Stn O
2. One Sub O
3. Two LFFs (three LFFs at Forest Hill aerial station)
4. Four FFs would be required to hold the MD/CU OS qualification
5. An overall increase in the Brigade establishment level of 32 staff
6. There will be an increase in the number of CU trained staff from 96 to 244 and a significant improvement in CU resilience
7. One CU to be based at the LOC with an establishment of one Sub O, One LFF and two FFs.

#### **80. Option B (Recommended)**

The station establishment at single appliance stations under option B would change to:

1. One Stn O

2. One Sub O
3. Three LFFs (four LFFs at Forest Hill aerial station)
4. Four FFs would be required to hold the MD/CU OS qualification
5. An overall increase in the Brigade establishment level of 16 staff
6. There will be an increase in the number of CU trained staff from 96 to 256 and a significant improvement in CU resilience
7. One CU to be based at the LOC strategically crewed from the staff at the seven single appliance stations.

### CU integration training requirements

81. CU officers at integrated stations will not be required to drive the CU once full integration has taken place, this would assist the Brigade, and the FBU with the agreed position as stated in the 2019 R2R Agreement regarding officers driving appliances.

Paragraph 41 of the 2019 R2R Agreement:

*Subject to the type of vehicle, wherever possible, motor drivers will be at Firefighter level unless deemed necessary due to specialist roles e.g. Command Units; Aerial appliances.*

82. FFs at aerial stations (Forest Hill) who are required to become CU MDs preferably should not hold any other specialist qualifications to avoid skills shortages.
83. FFs that are on development would not be required to hold the CU qualifications.
84. To fully carry out the CU integration we would need to review the establishment levels at the stations selected and then develop a plan with the Establishment and Performance Team (EPT) considering all of the skills requirements.

### CU Training course costs based on option B

Course	Course title	Class size	Delegates required	Number of classes	Class cost	Total cost
OISCU 1	CU Module 1	8	256	32	£558.64	£17,876.48
OISCU 2	CU Module 2 (CSS)	8	256	32	£279.32	£8,938.24
OISCU 3	CU Module 3	8	256	32	£1,326.77	£42,456.64
						£69,271.36

### CU driver requirements

MD driver requirement	Cost
112 LGV Courses	£15,680
112 EFAD Courses	£78,400
Total cost	£94,080

### CU driver training familiarisation costs

MD driver requirement	Course size	Courses required	Cost
112 CU MDs	2	56	£7,820.96

85. All CU training should be reviewed to align with the new rank structure of FF, LFF and Sub O. Integration with the existing trained CU Sub Os will allow a more phased training approach to be implemented whilst the training review takes place.

86. For option B the total training costs for all CU operator training, driver training, and familiarisation would be £171,172.32 as detailed in the table below.

#### All training costs

Training Requirement	Cost
256 CU Operator skills training	£69,271.36
112 LGV courses, 112 EFAD courses	£94,080
112 CU Familiarisation courses	£7,820.96
Total cost	£171,172.32

#### Project implementation Costs

##### Option A

87. Out of the total project costs of £1965k, £1347k will be an additional on cost and £618k will be one-off implementation costs (staffing costs, property costs and training cost).

88. £608k of the overall costs will be contained within current LFB budgets across 2020/21 and 2021/22 and £1357k will require additional investment across the 2020/21 and 2021/22 financial year (£10k in year 1 and £1347k in year 2).

##### Option B

89. Out of the total project costs of £1433k, £813k will be an additional on cost and £620k will be one-off implementation costs (staffing costs, property costs and training cost).

90. The one-off implementation cost of £620k will be contained within current LFB budgets across 2020/21 and 2021/22.

#### Total Project Costs (including operational staff)

	2020/21 £k		2021/22 £k		Total £k	
	Option A	Option B	Option A	Option B	Option A	Option B
Project team operational staff costs	195	195	98	98	293	293
Project team other staff costs	97	97	49	49	146	146
Property costs	10	10	0	0	10	10
Training course costs	162	162	7	9	169	171
Increased establishment (on-going costs)	0	0	1347	633	1347	633
LOC Crewing model allowances (on-going costs)	0	0	0	180	0	180
Total	464	464	1501	969	1965	1433

#### Finance comments

91. This report recommends the integration of CUs at stations. This will result in a revised station establishment at a net additional cost of £633k annually and additional costs for crewing one CU at the LOC of £180k annually, for a total ongoing cost of £813k. The 2020/21 Budget Report included an estimated cost for this of £325k in 2020/21 and £1.3m ongoing from 2021/22, this lower proposed cost will, therefore, reduce the budget gap by £516k and will be reported on as part of the budget process.

92. The report also notes that there will be implementation costs of £464k in 2020/21 and £156k in 2021/22. These implementation costs will be contained within existing resources.
93. Whilst the proposal set out in the report now costs less than the growth approved for CU integration, the additional spend should still be considered in the wider financial context and the projected budget gap for the LFC for 2021/22 and beyond.

### **Workforce comments**

94. The CUIP will bring about benefits for CU staff as set out in [paragraph 18](#) above, and will also increase CU-related knowledge and skills amongst the wider workforce, especially those on the integrated watches.
95. The FBU has been fully briefed on the CUIP as it has developed up until now; they are generally supportive and will be consulted throughout the process to reach agreement on the terms and conditions of CU integration. Also, the trade unions within the Joint Committee for Control have been briefed on the proposal to locate a CU at the LOC and are supportive of this.
96. A Project Board will be established, and a representative from the FBU will be invited to sit on the Board. The timeline for the CUIP is challenging and, as indicated above, we will work together to seek agreement.

### **Legal comments**

97. 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 GLA Act 1999, as amended by the Policing and Crime Act 2017, the Mayor may issue to the Commissioner specific or general directions as to the manner in which the holder of that office is to exercise his or her functions.
98. 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 (b) of Part 2 of the said direction requires the Commissioner to seek the prior approval of the Deputy Mayor before "[a] commitment to expenditure (capital or revenue) of £150,000 or above as identified in accordance with normal accounting practices". The Deputy Mayor's approval is accordingly required for the London Fire Commissioner to incur the expenditure set out in the recommendations to this report.
99. The statutory basis for the actions proposed in this report is provided by the Fire and Rescue Services Act 2004, under which the Commissioner must secure the provision of personnel and may take any action they consider appropriate to do this.

### **Sustainability implications**

100. The proposals outlined in this report focus on achieving more efficient and resilient crewing of CUs and revised locations of CUs to one appliance stations with optimised attendance times. The proposals are expected to provide the most efficient CU movements and thereby mileage, with associated air pollutants and carbon emission reductions possible, whilst maintaining the existing service provision and CU type. A reduction will contribute to the LFC's target as set by the Mayor to achieve a 60% CO<sub>2</sub> reduction by 2025, although the likely reduction resulting from these proposals is expected to be minimal.
101. The reduction in standby moves resulting from the proposed crewing solution is expected to balance out the staff moves resulting from the proposed Option B strategic crewing of the LOC CU.



102. The report also notes a review of pre-determined attendances should be undertaken, which could reduce mileage and thereby emissions further, although this is work that does not form part of the current proposals or recommendations.

### **Equalities implications**

103. The London Fire Commissioner and decision makers are required to have due regard to the Public Sector Equality Duty (s149 of the Equality Act 2010) when exercising our functions and taking decisions.

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.

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.

The Public Sector Equality Duty requires us, in the exercise of all LFC functions (i.e. everything the LFC does), to have due regard to the need to:

- (a) Eliminate discrimination, harassment and victimisation and other prohibited conduct.
- (b) Advance equality of opportunity between people who share a relevant protected characteristic and persons who do not share it.
- (c) Foster good relations between people who share a relevant protected characteristic and persons who do not share it.

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:

- (a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic where those disadvantages are connected to that characteristic;
- (b) 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;
- (c) 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.

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.

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—

- (a) tackle prejudice, and
- (b) promote understanding.

An Equality Impact Assessment (EIA) was undertaken on 13/05/20.

The impact assessment found broadly positive impacts through opening up opportunities to a greater pool of staff and some adverse impacts for staff who could meet the disability definition within the Equality Act 2010.

104.The CUIP team surveyed all existing CU staff. Of the 72 staff surveyed, 69 responded. Nine staff (14%) declared themselves as having a disability.

105.It is recognised that the percentage of CU staff (14%) declaring themselves as having a disability is overrepresented when compared to the operational workforce as a whole, which has 6% of staff declaring a disability. The CUIP team will work with the FBU to establish a work-stream to specifically look at options for this group of staff.

106.The CUIP team have also analysed staff data to look at the length of time that staff have held a CU position, a breakdown of gender, ethnicity, and age has been detailed in the tables below.

#### **Length of service in CU role**

Time in CU role	Number of staff	Percentage
6 to more than 10 Years	17	25%
0 to 5 years	50	75%
Total	67	

#### **Gender make up**

Gender	Number of staff	Percentage
Women	5	8%
Men	59	92%
Total	64	

#### **Ethnic origin breakdown**

Ethnic origin	Number of staff	Percentage
BAME	3	5%
White	60	94%
Not Known	1	2%
Total	64	

#### **Age breakdown**

Current age	Number of staff	Percentage
35-39	9	14%
40-44	10	16%
45-49	17	27%
50-54	22	34%
55+	6	9%
Total	64	

107.It is anticipated that the integration of CUs and the changes to the ridership will allow all ranks from FF to Stn O to ride the CU which will help increase the inclusion and diversity of CU staff.

Opening up opportunities for all station-based staff to ride the CU will assist with the Transformation Delivery Plan and Strategic Framework.

Appendices	Title	Protective Marking
Attachment	None	

Consultation [Note: this section is for internal reference only – consultation information for public consideration should be included within the body of the report]

Name/role	Method consulted
Mick Ellis - CUIP Manager	Email and meetings
GC Craig Carter - Central Operations	Email and meetings
Dave Flanagan - Establishment and Performance Team	Email and meetings
AC Dom Ellis - CU Replacement Project	Email and meetings
DAC Peter Rickard - Strategy and Risk	Email and meetings
Dave Shek - London Region Fire Brigades Union (FBU)	Email and meetings
Paula Taylor - Property Services	Email and meetings
Clive Eustice - ICT	Email and meetings
Andy Jones - People Services	Email and meetings
Paul Eady - ICT	Email correspondence
Mary-Anne Oats - Occupational Psychologist	Email correspondence
Abby Crawford - Organisational Development	Email correspondence

## Appendix 1

### Annual CU attendance data

- The table below shows the annual CU attendances from 2014 to 2018.

Call sign	2014	2015	2016	2017	2018	Annual Average
CU1 Edmonton	206	240	151	225	278	220
CU2 Islington	372	431	386	408	487	417
CU3 Barking	266	170	217	259	318	246
CU4 Lewisham	340	327	247	322	333	314
CU5 Woodside	234	198	164	163	182	188
CU6 Richmond	199	193	215	180	262	210
CU7 Wembley	231	210	155	236	248	216
CU8 Fulham	276	300	291	358	335	312
Total	2,124	2,069	1,826	2,151	2,443	2,123

### Percentage of CU commitment

- The table below shows the number of CUs the Brigade committed to incidents at each time. The vast majority of the time the Brigade have between two and four CUs committed at once, which is reflected by the PDA data. The data also shows that we have never had more than seven CUs committed at once (since 2016).

	Percentage of CU commitment							
No of CUs Committed at any one time	1	2	3	4	5	6	7	8
2016	1	26	33	27	7	1	4	0
2017	1	24	25	31	9	7	2	0
2018	1	7	31	30	17	6	7	0
2019 (Up to Oct)	0	5	40	29	11	9	6	0
	1	16	32	29	11	6	5	0

### CU off the run (OTR) data

- The table below shows the percentage of time that each CU has spent off the run (OTR) each year. The average time each CU has spent time OTR during the year has been due to staff shortages, CU maintenance and skills shortages.

	Time spent OTR %								
Year	CU1	CU2	CU3	CU4	CU5	CU6	CU7	CU8	Average
2016	28	19	15	20	26	16	26	24	22
2017	30	28	16	22	28	19	28	25	24
2018	30	34	30	20	41	22	26	16	27
2019	26	28	24	27	27	21	28	22	26
Average	29	27	21	22	30	19	27	22	25

### Training: current Command Unit courses

- There are associated training requirements with an integrated model and the requirement has been factored into the training schedule for 2020/2021.
- We have scheduled 28 CU courses for the training year (2020/2021) which will train 224 candidates. We will require four courses in the 2021/2022 training year to train the remaining 32 candidates. Each course has eight delegate places to meet the requirements of the CU integration project. We plan to start allocating staff to these courses as soon as possible to give staff as much notice regarding the intended course dates they will be required to attend. The first courses are

scheduled to start in April 2020 and run throughout the year. The courses have been scheduled throughout the training year to flatten the delivery demand.

### CU training courses scheduled

Course	Apr	Jun	Jul	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Total
OISCU1	2	2	1	4	4	3	2	3	4	3	28
OISCU2	2	1	2	3	4	4	2	3	3	4	28
OISCU3	2	1	2	3	4	3	3	3	3	4	28
Total	6	4	5	10	12	10	7	9	10	11	84

### CU driver requirements

- There has been detailed work carried out to fully cost the CU driver requirements at each station before integration takes place. Where there are insufficient MDs at stations that would be required to drive CUs, we would have to train new staff in this role. The existing requirements in place would need to be followed and staff would need to complete a Large Goods Vehicle (LGV) qualification followed by an Emergency Fire Appliance Driver (EFAD) driver qualification. These courses have been scheduled throughout the 2020/2021 training year.

### CU driver training familiarisation

- There will be a requirement to train additional staff at integrated stations to obtain the CU MD qualification. This requirement from the modelling work that we have carried out equates to 112 FFs that would require the CU MD familiarisation training.

### CU incident types

- The table below shows the list of incidents that attract a CU attendance based on our mobilisation policy.

Command Unit Incident types	
Major Incident procedure	Train crash in a railway tunnel
Mobilisation following a Firefighter Emergency Message (FFE)	Subsurface workings
Fire involving Fire Survival Guidance (FSG)	Operation PLATO
Fire - persons reported	Hazmat incident
Fire - multiple calls (4 or more)	Support for British Transport Police
Forward mobilising implementation to act as a control point	Mass decontamination LFB area
4 pumps/grass/special service/train/tram crash/catastrophic collapse persons involved	Confirmed mid-stream incident on the River Thames
Aircraft accidents and aircraft accident imminent (both on and off-airport)	Water operations
Aircraft /Helicopter accident involving the River Thames	