

# **Statement of Assurance 2023/24**

Report to: Date:

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

Report by:

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Report classification:

For decision

For publication

#### 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 (<u>London Fire Brigade Incident Records London Datastore</u>). This dataset is more granular then 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

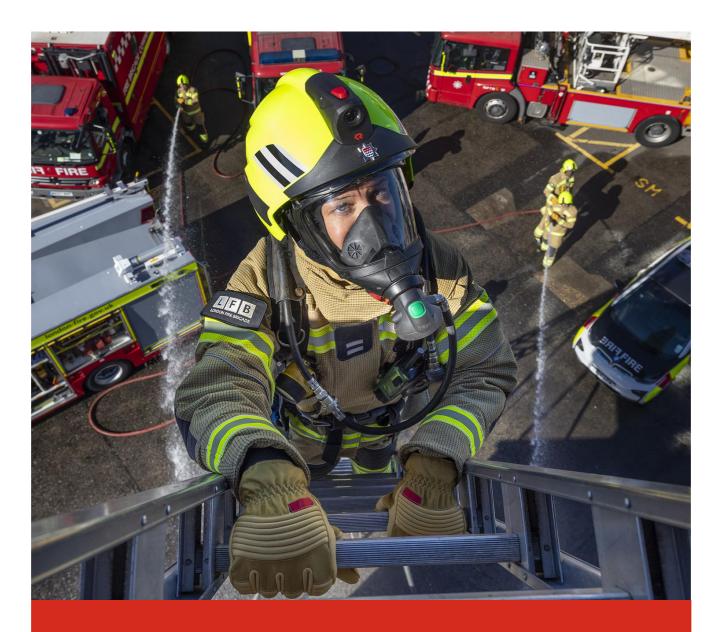
Appendix	Title	Open or confidential*
1	Statement of Assurance 2023/24	Not protectively marked

# 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

- 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 <a href="https://www.london-fire.gov.uk/media/042pjqpy/lfc-23-068-assessment-of-risk-2023-signed-v2.pdf">https://www.london-fire.gov.uk/media/042pjqpy/lfc-23-068-assessment-of-risk-2023-signed-v2.pdf</a>.

#### **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: <a href="https://www.london-fire.gov.uk/about-us/your-london-fire-brigade-our-plan-for-2023-29/">https://www.london-fire.gov.uk/about-us/your-london-fire-brigade-our-plan-for-2023-29/</a>
- 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 (<a href="here">here</a>). 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.
- 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**

- 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.
- 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.
- 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.
- 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.
- 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 <a href="National Risk">National Risk</a> 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

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.

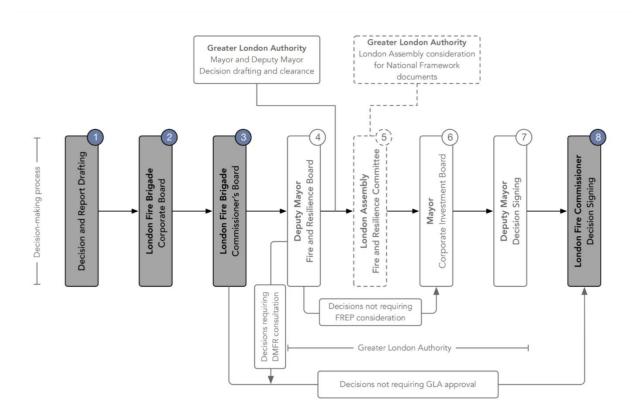
- 94. Our staff also have a primary role for the national fire sectors delivery of CONTEST, the UK Government's Counter Terrorism strategy. This involves working collaboratively with colleagues from the other blue light services, partner agencies and government departments to develop multi-agency capabilities 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 Interagency 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 20218, 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, coordinate, 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 at 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 polices, 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.
- 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 HMICRFS 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, HMCICFRS 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: <a href="https://www.london-fire.gov.uk/about-us/transparency/information-we-publish">https://www.london-fire.gov.uk/about-us/transparency/information-we-publish</a>.

#### **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.
- 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 bought 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)
Section 2: Deliver	y of Functions; CRMP	
Identify and assess	<ul> <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> <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> <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> <li>Community Risk Management Plan (CRMP)</li> <li>Service Strategies</li> <li>London Blue Light collaboration</li> <li>National Resilience Arrangements</li> </ul>
Prevent and protect	<ul> <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> <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.	website)  Community Risk Management Plan (CRMP)  Borough Risk Management Plans
Respond	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.	<ul> <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> <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> <li>Mutual aid agreements (Section 13/16 agreements)</li> <li>National resilience assets</li> <li>National operational guidance programme</li> </ul>
	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.	<ul> <li>Strategic Response Arrangements</li> <li>Corporate Business Continuity Policy</li> <li>Capital Guard</li> </ul>
Collaboration	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	<ul> <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> <li>NOL/JOL learning</li> <li>Joint statement of intent</li> <li>London blue light collaboration</li> <li>LESLP</li> </ul>
National Resilience	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 cooperation of fire and rescue authorities, as necessary, on devolved training and, where applicable, on the long-term capability management arrangements.	<ul> <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 or 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>

	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.	<ul> <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>
Gap Analysis	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).	<ul> <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>
	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.	<ul> <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.
National Coordination and Advisory Framework	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.	<ul> <li>Commissioner – member of NFCC</li> <li>LFB support and senior officer secondment for NFCC (and NCAF)</li> </ul>
Response to Terrorist Attacks or Marauding Terrorist Firearms Attacks	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.	<ul> <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>
National	<ul> <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>	■ Commissioner – member of FRSRB

Resilience Assurance	<ul> <li>authority to provide assurance to government that:</li> <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> <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>
	Fire and rescue authorities with MTFA teams must work with police forces and ambulance trusts to provide tri-service assurance of this capability.	<ul> <li>National Inter-agency Liaison officers (NILO) work closely with CT Policing and other key agencies</li> </ul>
Section 4: Governar	псе	
Managing the Fire and Rescue Service/Chief Fire Officer	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.	<ul> <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>
	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	<ul> <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.	Community Risk Management Plan (CRMP)
Documents to be prepared:  i) Integrated Risk Management Plan	<ul> <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> <li>Community Risk Management Plan (CRMP) is on London Fire website, hardcopies on request</li> <li>Assessment of Risk</li> <li>LFB Board Paper LFC0704 - has the assessment of risk 2022 that underpins the CRMP and meets the risk assessment requirement for the NF.</li> <li>LFB Board Paper LFC0742 - 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>

ii) Annual statement of assurance	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').	Statement of Assurance 2023/2024 (this document)  Statement of Assurance 2023/2024 (this document)
iii) Financial plans	<ul> <li>A medium-term financial strategy, an efficiency plan, and a reserves strategy. These can be combined or published separately.</li> </ul>	■ March – LFB Budget submission 2023/2024
Section 5: Achieving	g Value for Money	
Achieving Value for Money	• 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.	<ul> <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>
	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	<ul> <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).	<ul> <li>LFC's financial position and ensuring value for money</li> <li>PCR 2023 Procurement Act (Go-live 24th February 2025)</li> </ul>
Commercial Transformation	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.	<ul> <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>
	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.	<ul> <li>ESN programme</li> <li>PPE contract</li> <li>Workwear Contract</li> <li>NFCC/Home Office/Blue Light Commercial function</li> </ul>
	<ul> <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> <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>

		New Finance & Purchasing SAP system; manage approvals, ordering and spend controls and automated approval hierarchy/delegated authorities
Trading	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.	■ LFBe – currently dormant
Section 6: Workfor	се	
Fitness principles	<ul> <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><li>Fitness policy</li><li>Wellbeing Strategy</li></ul>
Re-engagement of Senior Officers	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.	<ul> <li>LFB recruitment policies</li> <li>Culture Transformation Programme (Leadership Model of Trust)</li> </ul>

	<ul> <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> <li>LFB recruitment policies</li> <li>LFB principal officer posts - advertised externally</li> <li>Culture Transformation Programme (Leadership Model of Trust)</li> </ul>
Section 7: Inspecti	on, Intervention and Accountability	
Inspection	<ul> <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> <li>HMICFRS Liaison Team</li> <li>Provision of data to HMICFRS by Information Management</li> </ul>
	■ 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.	<ul> <li>LFB's HMICFRS inspections</li> <li>GTI/HMICFRS action plan</li> </ul>
Accountability	<ul> <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> <li>Deputy Mayor for Fire and Resilience (from May 2024 Deputy Mayor for Planning, Regeneration and</li> </ul>

	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.	<ul> <li>the Fire Service)</li> <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>
Transparency	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.	<ul> <li>Data and transparency arrangements - London Fire Brigade</li> <li>London Datastore</li> </ul>