

LFB Assessment of Risk for London 2025

Report to:

Risk and Assurance Board
Audit Committee
Commissioner's Board
Deputy Mayor's Fire Board
London Fire Commissioner

Date:

21 May 2025
28 May 2025
11 June 2025
24 June 2025

Report by:

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Authorising Head of Service:

Susan Ellison-Bunce, Assistant Director Strategic Planning

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 Assessment of Risk (AoR) for London is the Brigade's current understanding of the risks affecting the capital to which London Fire Brigade could be expected to respond. This assessment is used to inform the London Fire Commissioner's (LFC) plans for reducing risk in London, as set out in the Community Risk Management Plan (CRMP) and in the six associated service strategies: Prevent, Protect, Respond, Prepare, Recover and Engage.

When the CRMP was approved, the LFC committed to an annual review of the AoR and this report presents the Assessment of Risk 2025. No changes to the CRMP are required because of this updated assessment. The changed assessment of existing risks and the new risks identified, will inform the Specials Review, Officer Review, service strategies and the content of relevant programmes and plans.

Proposed decision – For the Deputy Mayor

That the Deputy Mayor for Planning, Regeneration and the Fire Service has considered the attached report

Proposed decision – the London Fire Commissioner

That the London Fire Commissioner approves and publishes the Assessment of Risk 2025.

That the London Fire Commissioner approves that the method for assessing risk used in 2025 be adopted for 2026 as described in this report.

That the London Fire Commissioner approves the proposed means of reporting and tracking actions to control identified risks.

1 Introduction and background

- 1.1 The Brigade's Assessment of Risk (AoR) underpins the Community Risk Management Plan (CRMP), which describes the changes that the Brigade needs to make to achieve its vision and how it will make those changes. The CRMP also identifies improvements to existing services and the new services that are needed to respond to risk. The six service strategies that have their basis in the CRMP are: Prevent, Protect, Respond, Prepare, Recover and Engage.
- 1.2 The objective of the AoR is to provide the LFC with a robust and defensible assessment of all foreseeable risks to which LFB may have to respond or which may impact response. It supports a common understanding of operational risk across services and departments. The changes to the risk profile identified in the update for 2025 need to be considered by the owners of service strategies and delivery plans, who may need to adjust those strategies and plans to better manage risk.
- 1.3 Where transformative change is needed to address risk, the AoR should be reflected in relevant business cases. The AoR is integrated into the Brigade's approach to prioritisation of activity and new actions needed to adequately respond to red risks on the AoR have the highest priority. This informs decisions on resourcing where choices need to be made.
- 1.4 There are risks in the AoR that can also affect the Brigade's ability to operate and officers in Strategic Planning work closely with those in Business Resilience so that intelligence is shared and informs both assessments as relevant. For example, climate change may increase the likelihood and severity of wildfires in London; it may also impact on water supplies for firefighting. Risks to the Brigade's ability to operate are captured on the corporate risk register, whereas the risk of wildfire appears in the AoR.
- 1.5 The AoR is intended to be used as a technical document by LFB staff to direct and prioritise work. It is available to the public, but it is acknowledged that due to its complexity it is not primarily intended as a public risk communication tool. Community engagement on risk is expected to focus on local risk, using the borough risk management plan as a vehicle.
- 1.6 Teams involved in direct risk communication work with the public should refer to the AoR when planning and prioritising their communication but use appropriate tools for the specific audience.
- 1.7 The AoR has been reviewed for 2025 and updated in line with the LFC's commitment to review the AoR annually. It is presented for approval and is attached at Appendix 1.

2 Approach and key findings

- 2.1 The approach to developing the AoR is detailed in Appendix 2 and the equalities impact assessment that supports it is set out in Appendix 3. Officers recommend that this approach is adopted for the development of the AoR 2026.
- 2.2 The AoR takes a layered approach to assessing risks.
 - *Layer one* uses the results of engagement workshops and polling to summarise public perception of risk. The details and results of this work can be found in section 2 of the AoR itself. This work is informed by an equalities impact assessment (Appendix 4) which identifies seldom heard groups for inclusion in the engagement work.

The key findings from layer one show concerns around malicious threats and terrorism, street violence, fires in purpose-built flats and high-rise residential buildings and electrical safety and fires caused by lithium-ion batteries.

- *Layer two* is a data-led risk assessment using the most recent five years of incident data to identify relatively common risks that the Brigade might reasonably expect to deal with on a day to day basis. The details of this work and the results can be found in section 2 of the AoR and a summary of the changes to high, and very high, risk scores from 2024 is at Appendix 5.

The key findings from layer two are an increase in the severity of high-rise fires and increased frequency of incidents of persons threatening to jump.

- *Layer three* references the London Risk Register and is a risk assessment of rare or “worst-case” scenarios which may not occur with sufficient frequency to appear in LFB five-year incident data or are yet to have occurred. The details of this work and the results can be found in section 2 of the AoR and a summary of the changes to high and very high risk scores in the London Risk Register from 2024 is at Appendix 6.

The key findings from layer three identify a more complex and varied malicious threat picture; the risk of Marauding Terrorist attack using firearms has increased further on the London Risk Register as has Malicious Cyber-attack on civil nuclear installations. The risk of fires in high-rise buildings is also more highly rated in the latest version of the London Risk Register.

- *Layer four* presents new and emerging operational risks and trends identified and prioritised by subject matter experts, policy owners, key stakeholders and Assistant Commissioners. The outcomes from this work can be found in section 2 of the AoR; Appendix 7 describes the methodology used for the workshops, Appendix 8 provides a full list of the emerging risks identified.

Research into good practice identified the Royal Academy of Engineering's report: *Building Resilience: Lessons from the Academy's Review of the National Security Risk Assessment Methodology*¹. This recognizes that low-likelihood, high-impact events can be disproportionately disruptive when readiness is insufficient. Traditional approaches to risk assessment that focus on likelihood as a key metric can obscure critical gaps in capability and preparedness for risks with a low likelihood.

As a result, the emerging risks in layer four of the AoR have also been assessed for preparedness against impact. That work has not been included within the AoR itself; it will be used to help prioritise any work needed to better manage the risks identified in the AoR.

The key findings from layer four build on those identified in 2024. Concerns still exist regarding the changing built environment, including modern methods of construction, and

¹ <https://raeng.org.uk/media/g31bttwt/raeng-building-resilience.pdf>

the increasing density of very tall residential buildings and the associated operational challenges. Officers note that the proliferation and wider adoption of new fuels, energy sources and bulk energy storage, in particular lithium-ion energy storage, present ongoing and developing operational challenges. This also remains a concern from 2024.

Climate change and societal pressures are anticipated to result in an increasing number of large incidents and incidents with high resource utilisation. Malicious or security-related incidents also remain a concern; in particular the potential for multi-site incidents and the impact this could have on resources and deployment.

3 External Scrutiny and Review

- 3.1 The 2025 AoR was reviewed by an external panel of academics and subject matter experts, as in previous years. The purpose of the Panel is to provide independent academic and subject matter expert feedback on the AoR with reference to the robustness and defensibility of the approach. The Head of Risk, Planning Assumptions, Learning and Exercising, London Resilience was invited to chair the panel this year to provide fresh scrutiny. Appendix 9 provides the terms of reference for the Panel and provides the full list of attendees.
- 3.2 The inclusion of a panel statement as to the robustness of the AoR provides assurance to the LFC that this assessment of risk is robust and defensible against industry and academic best practice.
- 3.3 The 2025 Panel provided the statement below outlining their view of the robustness and defensibility of the AoR approach. Feedback from the Panel regarding links between layers and regarding individual vulnerability has been addressed in the updated AoR attached. The Panel described the Brigade's approach to assessing risk as, "leading practice". The full statement is below:

"The Panel recognises that through the Assessment of Risk (AoR), London Fire Brigade (LFB) has continued to develop and improve its approach to assessing fire and rescue related risks in London. LFB's approach continues to demonstrate a strong desire to engage with the communities of London in the construction of its community concerns layer, as well as using internal and external expertise in the development of its emerging trends, extraordinary and future risks layers. The Panel welcomes the inclusion of a more detailed method document as recommended by the 2024 Panel. The 2025 Panel has made several specific and general recommendations to the Brigade, including an introduction which outlines the links between layers and clarification of the approach to individual vulnerability. This will make the AoR more robust and defensible. Included in the Panel's recommendations is the development of a foresight function that would enhance the identification of future risks. In conclusion, the Panel endorses the LFB's 2025 AoR and will continue to work with the Brigade in its future evolutions, as it continues to refine and enhance its approach to understanding fire and rescue related risk in London. The Panel recommends sharing this leading practice with other services and agencies."

4 Next steps

Action planning

- 4.1 The Key Findings section of the AoR (Appendix 1 to this report, pp 11-15) sets out, by layer, the risks where further mitigation should be considered. Some of these risks are new, some are carried forward from 2024 and some have a higher rating than in 2024.
- 4.2 The Assistant Director of Strategic Planning has reviewed the Community Risk Management Plan in the light of this new AoR and considers the Plan provides officers with the framework to manage these risks and requires no amendment itself.
- 4.3 Publication of the AoR triggers a formal review of service strategies, plans and policies. The tables in the Key Findings section indicate the service strategies or policy owners where changes are most likely to be needed. However, all Heads of Service are expected to review the AoR and to make amendments to their strategies and plans, where relevant and proportionate, to mitigate the risks.
- 4.4 Strategic Planning will provide support and guidance to the relevant Heads of Service on how to take a consistent approach to prioritizing this work, using the assessment of preparedness against impact referenced earlier in this report.

Providing an audit trail

- 4.5 Resource constraints last year prevented officers from tracking and recording the reviews that should have taken place following the publication of the AoR. Several risks identified in the AoR 2024 appear in this year's assessment and there is no audit trail that demonstrates the actions that have been taken to address them. These include the operational and physiological constraints that exist in relation to firefighting and evacuation in high-rise buildings, concerns about operational preparedness in relation to modern construction methods and the proliferation of alternative fuels.
- 4.6 To address this reporting gap for 2025, officers propose to introduce a tracking process so that progress against the actions in the Key Findings tables mentioned above can be reported quarterly to the Risk and Assurance Board. This will provide assurance to the LFC that the highlighted risks are adequately controlled or that there are plans to introduce future control measures to mitigate the risks.

Corporate risks

- 4.7 Risks which are highlighted in the AoR 2025 and which are unable to be brought within the LFC's risk appetite for service delivery after review by lead officers may require escalation to the corporate risk register.

5 Planned development of the Assessment of Risk for 2026

- 5.1 Further development of the Assessment of Risk in 2026 will focus on increasing sophistication of layer one, Public Concerns and Risk Perception. LFB will seek to extend the reach of workshop-based activity by further leveraging borough level engagement. This layer informs work on local risk management through Borough Risk Management Plans and Station Delivery

Plans. A key area of development will be increasing the number of LFB Boroughs able to deliver risk focused workshops.

- 5.2 LFB is developing a Strategic Foresight function. It is expected that as this function matures the workshop series that results in layer four of the AoR will focus on issues that fall into Horizon One and Horizon Two and that Horizon Three issues will be addressed through the wider foresight function. LFB will explore using this approach to align more with the National Security Risk Assessment approach to Acute and Chronic Risks.
- 5.3 LFB will continue to develop its demand modelling capability including modelling of impacts of rare and extraordinary risks and defining more clearly the resources required to deal with both, “normal requirements,” and extraordinary risk.
- 5.4 Finally, the timing of the production of the AoR will continue to be brought forward. The intention is to have a final draft available in February or early March to inform the departmental and borough planning processes.

6 Values Comments

- 6.1 The LFC notes the Fire Standards Board requirements around adopting and embedding the Core Code of Ethics at an individual and corporate level. Following extensive engagement, the LFC has introduced Brigade values which build on and do not detract from the Code of Ethics.
- 6.2 The Brigade values are:
 - Service: we put the public first
 - Integrity: we act with honesty
 - Teamwork: we work together and include everyone
 - Equity: we treat everyone fairly according to their needs
 - Courage: we step up to the challenge
 - Learning: we listen so that we can improve
- 6.3 The approach to updating the LFB Assessment of Risk for London (AoR) has been undertaken in line with our values in the following key ways:
 - **Service:** The AoR informs the priorities in our service strategies and enables the Brigade to be focused on risk. Our community layer demonstrates our intention to put the public first.
 - **Integrity:** Basing the approach to pan-London risk on transparent, evidence-based assessments and by publication of a detailed methodology demonstrates openness and integrity in the LFC’s assessment process.
 - **Teamwork:** Collaborating across departments and with external partners to identify hazards and to analyse risks embeds team work and creation of a shared understanding of risk in this AoR process.

- **Equity:** The exposure of individual members of the public to risk will differ with their location and activity, this exposure may be correlated or independent to any individual protected characteristic. The layered approach adopted to assessing risk in the AoR ensures that each type of fire service-related risk an individual may be exposed to, is assessed. The inclusion of Layer One: Public Concerns and Risk Perception ensures communities' concerns are highlighted and centered.
- **Courage:** Seeking challenge and review from external experts and academics of the review panel requires courage. Openness to challenge and feedback ultimately improves the Brigade's ability to assess risk effectively.
- **Learning:** Officers have sought to listen to the lived experience and concerns of the communities we serve in developing layer one of the AoR. The approach reflects learning from these communities and from the LFB Community Forum. Feedback from the External Expert and Academic Panel has been actioned, demonstrating an open approach to learning from external best practice.

7 Equality Comments

- 7.1 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.
- 7.2 It is important to note that consideration of the Public Sector Equality Duty is not a one-off task. The duty must be fulfilled before taking a decision, at the time of taking a decision, and after the decision has been taken.
- 7.3 The protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership (but only in respect of the requirements to have due regard to the need to eliminate discrimination), race (ethnic or national origins, colour or nationality), religion or belief (including lack of belief), sex, and sexual orientation.
- 7.4 The Public Sector Equality Duty requires decision-takers in the exercise of all their functions, to have due regard to the need to:
 - eliminate discrimination, harassment and victimisation and other prohibited conduct.
 - advance equality of opportunity between people who share a relevant protected characteristic and persons who do not share it.
 - foster good relations between people who share a relevant protected characteristic and persons who do not share it.
- 7.5 Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:
 - remove or minimise disadvantages suffered by persons who share a relevant protected

characteristic where those disadvantages are connected to that characteristic.

- take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it.
- encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

7.6 The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.

7.7 Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:

- tackle prejudice
- promote understanding.

7.8 An Equalities Impact Assessment (EIA) was created for the public engagement element of the AoR 2024. This EIA was reviewed prior to starting the AoR 2025 process by the Community Engagement Team and found to be current. This guided the creation of workshops for seldom heard and at-risk groups; this can be found in Appendix 4.

7.9 An EIA was completed for the AoR 2025 process as a whole; this can be found in Appendix 3.

8 Other considerations

Workforce comments

8.1 The representative bodies were engaged in the development of the assessment of risk process which remains unchanged for 2025. In addition, workshops were carried out with Control Staff, the Operational Sounding Board and with watch-based staff. No changes to the approach to assessing risk were identified during these engagements, however it is notable that the watch-based staff expressed concern about the level of incidental violence within the community to which they are exposed whilst carrying out their day-to-day duties.

Communications comments

8.2 This is an internal facing document that is used to inform service strategies, departmental plans and BRMPs (Borough Risk Management Plans). It also informs prioritisation of work in central departments, such as Operational Policy and Assurance. The document is not primarily intended as a tool for communicating risk information to the public, but communication and community engagement teams should use the document to inform their work.

8.3 All relevant stakeholders have been made aware of the review of the Assessment of Risk and Strategic Planning will continue to work in collaboration with those stakeholders so that its relevance is understood and document owners understand where changes to strategies and plans are required

- 8.4 This version of the Assessment of Risk will be published both on the external website and on hotwire. Active promotion of the document to staff is proposed as it is intended to both promote a common understanding of operational risk and serve as a prioritisation tool. The wider promotion of the document across the organization as a whole will be done in collaboration with the internal communications team.
- 8.5 Strategic Planning will develop a stakeholder engagement plan to promote the use and understanding of the AoR across departments with particular reference to those prioritising work or communicating with the public, partner agencies and other stakeholders about risk.

9 Financial comments

- 9.1 The update to the AoR will not directly result in any financial consequences. However, in line with reviewing all of LFB's material risks, if it is identified that the organisation's control measures require change, then there will be cost implications (both potentially in savings and additional investment). The cost implications would be because of placing increased mitigating factors to ensure the risk is managed appropriately.
- 9.2 Potential additional budgetary pressures relating to the update of the AoR will be managed within existing departmental budgets.
- 9.3 Any changes to the assessment of risk would be assessed to its financial implications and form part of the budget cycle process

10 Legal Comments

- 10.1 Under section 9 of the Policing and Crime Act 2017, the London Fire Commissioner ("Commissioner") is established as a corporation sole with the Mayor appointing the occupant of that office.
- 10.2 Section 1 of the Fire and Rescue Services Act 2004 states that the Commissioner is the fire and rescue authority for Greater London.
- 10.3 Under section 327D of the GLA (Greater London Authority) Act 1999, as amended by the Policing and Crime Act 2017, the Mayor may issue to the Commissioner specific or general directions as to the manner in which the holder of that office is to exercise his or her functions.
- 10.4 By direction dated 1 April 2018, the Mayor set out those matters, for which the Commissioner would require the prior approval of either the Mayor or the Deputy Mayor for Fire and Resilience (the "Deputy Mayor").
- 10.5 Paragraph 3.1 of Part 3 of the said direction requires the Commissioner to consult with the Deputy Mayor as far as practicable in the circumstances before a decision is taken on (inter alia) any "[c] decision that can be reasonably considered to be novel, contentious or repercussive in nature, irrespective of the monetary value of the decision involved (which may be nil)".
- 10.6 The decisions recommended in this report are considered to be 'novel, contentious or repercussive' and therefore the Deputy Mayor must be consulted before a final decision is

taken.

10.7 When carrying out his functions, the Commissioner, as the fire and rescue authority for Greater London, is required to “have regard” to the Fire and Rescue National Framework prepared by the Secretary of State (“Framework”) (Fire and Rescue Service Act 2004, section 21).

10.8 The production of an Integrated Risk Management Plan (IRMP) is a requirement of the Framework. In line with guidance from the National Fire Chiefs’ Council, the Commissioner is now referring to the IRMP as a Community Risk Management Plan (CRMP).

10.9 The Framework states that the Commissioner’s CRMP “must” meet certain requirements, in considering the AoR 2025 the Commissioner must therefore have regards to the following requirement of the Framework; that the CRMP must:

- 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;

10.10 To assist the Commissioner in coming to a view on this matter it is recommended that the Commissioner should consider whether the CRMP properly reflects the updated AoR. It would not be sufficient to state it is met by reference to additional documents, the CRMP itself must demonstrate this in and of itself. When considering if the risk analysis is properly reflected in the CRMP it is not required that it reproduces the analysis completely but instead that it represents it accurately and in an appropriate way.

10.11 The recommendation in this report is that the CRMP does not need amending in response to the changes to the AoR 2025. If the Commissioner agrees with this recommendation, then it falls to the Commissioner to decide following consultation with the Deputy Mayor.

List of appendices

Appendix	Title	Open or confidential*
1	Assessment of Risk 2025	Open
2	Assessment of Risk 2025 methodology	Open
3	Equalities Impact Assessment AoR 2025	Open
4	Equalities Impact Assessment: Layer One. Public Concerns and Public Risk Perception	Open
5	Summary of Changes to High and Very High risk scores relating to incident type in Layer Two	Open
6	Summary of Changes to High and Very High London Risk Register risk scores in Layer Three	Open
7	Emerging Trends and Future Risks: Operational Horizon Scanning Workshop Series: Method	Open
8	Emerging Trends and Future Risks: Workshop 1 detailed results	Open
9	Academic and Professional Review Panel for the London Fire Brigade (LFB) Assessment of Risk (AoR) 2025 Terms of Reference	Open

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**

Originating officer declaration

Reporting officer to confirm the following by using 'x' in the box:

Reporting officer

Thomas Ronan has drafted this report and confirms the following:

1. Assistant Director

Susan Ellison-Bunce has reviewed the documentation and is satisfied for it to be referred to Board for consideration

x

2. Advice

The Finance and Legal teams have commented on this proposal:

Tom Davies Legal Advisor, on behalf of General Counsel (Head of Law and Monitoring Officer).

Agnes Csizmadia, Financial Advisor, on behalf of the Chief Finance Officer.