

Decision title

Delivering our Strategy: Incident Command

Recommendation by

Assistant Commissioner, Operational Policy and Assurance

Decision Number

LFC-0347-D

Protective marking: **NOT PROTECTIVELY MARKED**

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Summary

Report LFC-0347 outlines the strategy for developing incident command within London Fire Brigade. The purpose of this strategy is to establish a clear direction in the development and application of incident command across the organisation and ensure all relevant officers have the appropriate knowledge and skills to be the best they can. The Strategy will deliver:

- The creation of more flexible guidance
- The creation of clearly defined competence criteria
- The delivery of accredited command qualifications
- A revised incident command maintenance of competency framework
- The delivery of a revised maintenance of skills programme
- A robust revalidation process
- Clearly defined promotional gateways
- Clear links with learning from our incidents
- A command behavioural framework - 'THINCS'

Decision

That the London Fire Commissioner decides to authorise expenditure from the transformation reserve to permanently establish the requested posts for an LFB 'in-house' incident command training team – relating to a part year cost of £369k in 2020/21 and then an ongoing cost of £553k from 2021/22.



Andy Roe

London Fire Commissioner

This decision was remotely
Date signed on Tuesday 30 June 2020

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Report title

Delivering our Strategy: Incident Command

Report to

Deputy Mayor's Fire and Resilience Board

Date

12 May 2020

Report by

Assistant Commissioner, Operational Policy and Assurance

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Summary

This report outlines the strategy for developing incident command within London Fire Brigade. The purpose of this strategy is to establish a clear direction in the development and application of incident command across the organisation and ensure all relevant officers have the appropriate knowledge and skills to be the best they can. The Strategy will deliver:

- The creation of more flexible guidance
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Recommended decisions

That the Board

1. Notes the Brigade's updated Strategy for developing Incident Command as outlined in this report; and
2. The Commissioner decides to authorise expenditure from the transformation reserve to permanently establish the requested posts for an LFB 'in-house' incident command training team – relating to a part year cost of £369k in 2020/21 and then an ongoing cost of £553k from 2021/22.

Background

1. This report details a transformation strategy for incident command, incorporating the recommendations from:
 - a) HMICFRS Fire & Rescue Service effectiveness, efficiency in response to the recommendations;

- b) Grenfell Tower Inquiry Phase 1 Report; and
 - c) Independent review of training Report, (conducted by Ribband Star Limited).
2. This has resulted in the creation of a realistic and robust incident command transformational strategy, which by design ensures not only current identified risk critical training is prioritised but also ensures a more agile and sustained approach going forward. By its very nature, incident command impacts across numerous brigade departments and this strategy identifies the transformational needs across the organisation.
 3. To inform our workforce and build a trusting relationship will require the influencing both the hearts and minds of our staff. The incident command management team has undertaken a number of stakeholder engagement sessions, to better understand our journey of transformation and to allow our staff to feel fully connected with the process, by influencing at the very start of our journey.
 4. To aid the delivery of this strategy and to ensure the wider continued transformation of LFB remains consistent and fully understood, both the structure and the method of how incident command transformational strategy will be delivered, will align with the four strategic pillars of the LFB transformation delivery strategy.

The best people and the best place to work

5. Given the exceptionally complex environment we ask our incident commanders to work within, it is imperative we ensure that we have 'the right person, making the right decisions, for the right reasons'.
6. In order that we can drive the change necessary for the transformation of incident command, we need to demonstrate effective leadership by delivering a clear and consistent message. To achieve this, it is recommended that a new LFB Incident Command Philosophy is adopted. The new philosophy will deliver a clear supporting message, and sense of direction that will enable our staff to be confident in their application of command decision making, building trust in our workforce and supporting them to be the best at what they do.

LFB Incident Command Philosophy

7. In recognition of The firefighter safety maxim within National Operational Guidance, we have developed the following philosophy:

The LFB generally approaches operations in a default 'offensive mode' in line with the firefighter maxim to save life and keep our communities safe. This approach is underpinned by actions and decisions based on an excellent understanding of risk. Safety is a top priority and to achieve this incident commanders are trained and supported to; implement safe systems of work, demonstrate the highest standards of leadership and professionalism, promote a positive incident command culture.

8. The incident command transformational strategy will produce a clear and supportive suite of incident command development programmes, delivering learning pathways across all ranks within LFB, from acting Leading Firefighters to Brigade Managers, see [Appendix 1](#). These development courses will be delivered to our incident commanders prior to undertaking a new rank, rather than the current process of promotion and then development. This will help ensure our staff feel fully supported and effectively trained.

9. The design of these courses will ensure our incident commanders have effective training delivered in a blended approach to maximise the learning opportunities of those who attend and facilitate the different learning styles of the diverse workforce that go to make up our organisation. There will be mandatory elements of the course delivered through e-learning packages, enabling candidates to work at a pace that suits their needs but the vast majority of learning will be delivered through face to face guided learning sessions.
10. There will also be more opportunity for our Level 1 commanders to benefit from the opportunity to take command of crews in addition to computer software-based scenarios. This was identified in one of the observations of the Independent review of training report, as well as from the responses of our staff we have engaged with as part of our stakeholder engagement process. This approach will see improved development of the non-technical skills and behaviours required to be effective incident commanders.
11. There will be a new LFB/National Operational Guidance (NOG) behavioural framework introduced as part of these courses, designed specifically for our commanders. These incident command behaviours will become an integral part of the new leadership development framework and will clearly identify the standards of behaviour required to be an effective fire service leader, in the context of command at operational incidents. By embedding incident command leadership behaviours into the newly developed LFB leadership framework, it will create a joint core learning pathway for leadership and will form part the wider progressive route to acquiring leadership competency.
12. The 'Delivering our Strategy: Leadership Development Report' produced by the Assistant Director People Services has already identified a joint approach between the central leadership team and the Operational Policy and Assurance (OP&A) department. It is recognised that incident command leadership is a specialist skill and should start to form part of LFB's existing incident command development interventions in a phased approach, as our leadership culture develops. This has resulted in incident command leadership development being included as a requirement in the TCAP for Level 1 and Level 2 incident command development courses.
13. As a recommended baseline standard for development and assessment, the National Fire Chiefs Council (NFCC) have been working with Cardiff University to develop 'The Incident Command Skills' (THINCS) behavioural marker system. This will provide a national standard for all UK FRS through a command skills competency framework for judging the performance of incident commanders; and support the preparation and development of incident commanders during training, assessments, and at real incidents. This new behavioural marker system is expected to become part of NOG in spring 2020.
14. It is recommended that 'THINCS' is adopted by the LFB, as part of LFB's existing NOG integration project. If the recommendation is accepted, the Incident command policy team will continue to work with the central leadership team to develop this work further and will be implemented using a phased approach to complement the incident command transformational strategy.
15. The independent review of training report highlighted LFB's inability to adequately respond to organisational training needs that are highlighted through our organisational processes such as; the performance reviews of the command function (PRC) and performance review of operations (PRO) and identified this inertia can create delays of 12 – 18 months with our current processes to review training content.
16. This will be partly addressed by the implementation of a dedicated 'in-house' LFB incident command training team and is integral to this strategy. It will provide a more agile training and

development model, enabling our organisation to respond to our organisational learning needs through centrally delivered development of skills courses, facilitated locally and more flexibly.

17. This dedicated team of LFB officers will create a group who can specialise in the subject of incident command to create and deliver incident command training content and courses. Their creation will bring numerous benefits to LFB:
 - a) Improve sector competence of incident command
 - b) Centrally delivered training events in improved localities
 - c) Provide structure and content for locally run and delivered area and officer command training and exercises, improving consistency across the brigade.
 - d) Improve capacity of Babcock Training Ltd. (BTL), enabling improved training delivery of other courses
 - e) Improved relevancy and currency of incident command trainers and assessors

Seizing the future

18. The incident command transformation strategy will look to deliver a more rapid response to national and local identified areas of improvement to become better as a learning organisation.
19. This will see a full review of how we learn from our incidents and will create a more supportive operational assurance process, using organisational learning as it's precursor, with mentoring and coaching as it's heart. This is in contrast to its currently perceived negative perception, which was highlighted as part of our HMICFRS final report, where it stated:

'We were told that organisational culture inhibits commanders from using operational discretion. Incident commanders aren't confident that the brigade would support them in using operational discretion. Moreover, not all staff feel that the tone of the brigade's post-incident debrief meetings, which review such decisions, supports a learning environment'

20. The specific subject of operational discretion is addressed later in this report.
21. The review of our learning process will ensure that our organisational continuous improvement cycle reflects the practices identified in the National Operational Learning (NOL) Good Practice Guide. LFB will continue to be an active member of the NOL process and remain integral to national excellence.
22. We will make more effective use of our operational improvement process. This will be achieved by ensuring we have a formal review process, where learning topics identified within the operational improvement process are then used as context subject matter within the development of all incident command training courses, and or the technical knowledge and understanding bibliographies. This will be fully auditable moving forward, to allow clearly identified action as a result of our learning and the rationale that supports it.
23. The strategy will review the current de-briefing process and how this feeds into operational improvement. This currently consists of informal and formal performance review of operations and performance review of command debrief sessions. Internal consultations are being held with all levels of employees, to ascertain perceptions and overall effectiveness. The aim is to explore options to enhance and promote a learning environment thereby enhancing the organisation's ability for continual, mindful improvement.

24. Contact has been made with the National College of Policing where current protocols are being assessed as to their suitability moving forwards. The joining of a national working group with several other fire rescue services will ensure an outward looking collaborative solution will be intertwined within the final recommendations, as learning opportunities continue to be explored across the emergency service sector, as well as several external organisations in the private sector. This will see a diverse range of industries engaged with a view to ascertain best practice in post critical incident learning.
25. The incident command transformational strategy will continue to develop full alignment of our competence criteria, (see below) for all ranks of the organisation. This will see validation, revalidation and maintenance of competence criteria developed in unison, so independent of the environment where it is viewed, 'what good looks like' remains consistent.
26. This Strategy will ensure the use of data taken from all areas where competence is assessed and analysed to inform the operational improvement process, as well as future training topics and thematic audits.

Delivering excellence

27. To ensure excellence we must develop assertive, effective & safe decision makers, as these are the individuals who lead the delivery of our operational service, ensuring the safety of the people of London. Achieving this will require a holistic organisational approach and a requirement to align and set clear direction across all departments involved by pulling together all strands of the organisation that impact on incident command. In doing so, it will provide assurance that we have the most robust commanders, enabling them to perform effectively in the most complex and challenging of built environments in the UK prior to our incident commanders adopting a command role. It will also ensure our fire control staff have the appropriate knowledge and understanding of the command environment creating a more effective relationship between the incident ground and fire control.
28. To deliver this aim, the delivering excellence section of incident command transformational strategy will be divided into 7 work streams, this is also reflected in [Appendix 1](#) below:
 - i. **The creation of more flexible guidance**
29. To enable our commanders to be assertive, effective and safe and to achieve the strategic aim of integrating NOG, all current incident command policies and procedures and their underpinning risk assessments need to be reviewed. This review will look to provide more flexible guidance by adopting the NOG style guide which will see the removal of unnecessary imperative verbs such as 'must and 'will'.
30. In doing so, it will create more freedom for incident commanders to work with when achieving their objectives, which is essential to the appropriate and effective use of operational discretion. This will help address the issues raised in HMICFRS final report relating to operational discretion.
31. To 'fully' address the issues raised and build trust and confidence of our staff, it is recommended the operational discretion process is reviewed, which will provide the appropriate guidance and training for its correct application. An organisational statement of assurance that provides support and reassurance to our incident commanders will underpin this trust (a separate paper regarding this matter is also being presented at Operational Directorate Board). The recommended incident

command philosophy will be integral to this statement of assurance and assist in developing a positive incident command culture.

32. The incident command policy team will work with the NOG integration team to create more flexible guidance through the introduction of the new NOG integration model supported and aligned with the latest review of the Incident Command and the current version of the Major Incident National Operational Guidance. The work undertaken for this will help inform and develop the NOG integration methodology going forward.

ii. The creation of clearly defined competence criteria

33. This will see the continued development of competency criteria for all ranks and will align with National Occupational Standards, the LFB leadership framework and Skills for Justice Awards accreditation criteria. These criteria will be used to help inform a training needs analysis for all ranks and will go to create validation and re-validation assessment criteria.
34. Work is about to commence on the creation of a new professional standards framework for incident command, which will replace the current National Occupational Standards. The Central Programme Office (CPO), will undertake an administrative and policy support role on behalf of the Fire Standards Board and a small task and finishing group made up of members of the National Operational Effectiveness Working Group and National Command & Control User Group will be established as subject matter experts during their creation. Members of LFB will be assisting in this work providing direction and influence of the standards for the future.

iii. Delivery of accredited command qualifications

35. Accredited command qualifications will provide robust validation of knowledge & understanding, in addition to the practical application of skills and behaviours for all levels of command of our organisation. The qualifications will be delivered by BTL who will become an accredited centre for the delivery of Skills For Justice Awards.
36. The Incident command policy team are currently working with BTL to review the current Level 1 development courses and introduce the 'SFJ Awards Level 3 Award in Initial Incident Command in Fire and Rescue Services', which are due to pilot during June 2020 with a roll out date of September 2020. This training/award will be delivered to those that have been identified to undertake the role of L/FF.
37. To address the cause of concern identified in HMICFRS final report, staff who have been identified to act-up to L/FF will undertake all safety critical criteria of the award and assessed against the same practical application validation criteria to ensure a suitable level of competence is achieved. This can then be used as recognised prior learning should an individual progress and be identified to undertake the role of L/FF.
38. The 'SFJ Awards Level 4 Award in Intermediate Incident Command in Fire and Rescue Services' will be introduced for those identified to undertake the rank of station commander and group commander. The design of this award is due to commence October 2020 with a pilot scheduled for January 2021 and roll out in March 2021.

39. Accreditation for the ranks of DAC and Brigade Managers is currently under review and recommendations will be provided in a separate paper.

iv. The delivery of a revised maintenance of skills programme

40. Following the creation of each acquisition course, a training needs analysis will take place to identify what criteria needs to be maintained through ongoing centrally delivered guided learning. Once established an appropriate delivery method will be identified to ensure effective delivery of the identified skills and behaviours.
41. It is currently envisaged that due to capacity issues the ongoing maintenance of skills of our Level 1 incident commanders, (Acting LFF – SO) will continue to be delivered by BTL with revised course content that reflects the training needs analysis of each individual rank's acquisition course.
42. To address recommendation 13 of the independent review of training report, it is proposed to deliver the maintenance of skills courses for SC/GC (and to support DAC/AC level training) with the use of an in-house LFB incident command team (see para 16/17 above). Funding for this team has been included in the Transformation Reserve in 2020/21 (see para 52). A further report detailing information on the teams function and progress on its development and delivery will be submitted in due course.

v. A robust revalidation process

43. This will build on the already delivered Level 1 revalidation process and imminent Level 2 process, due to be rolled out in September 2020. Revalidation will provide incident commanders an opportunity to demonstrate competence against identified competency criteria applicable to the rank they hold. Revalidation for Level 1 officers requires the completion of an incident command exercise (ICE) along with a knowledge check. Level 2 -4 officers will complete the same along with an additional requirement of completion of the incident command log (ICL). The ICL allows officers to record their operational hours recorded at incidents, as well as any training hours undertaken.

vi. Clearly defined promotional pathways

44. The incident command policy team are working with People Services to create defined promotional pathways, providing a clearer overview of the required workforce skills and competencies. This will allow improved workforce planning of promotion processes, delivering individual development programmes prior to our staff undertaking an operational role. This will help identify potential and higher performers to effectively succession plan and build on internal capabilities.

vii. A robust incident command maintenance of competency framework.

45. With the introduction of minimum command hours being introduced in the revised NOG for incident command, a proactive approach to maintaining competence will be essential. The Incident command policy team will liaise with Training Assurance and the DaMOP Project Team to produce a rank specific training needs analysis to inform a maintenance of competency framework for all incident commanders going forward. See [Appendix 1](#)

Outward facing

46. The delivery of the incident command transformational strategy is an ideal opportunity to influence and fully engage the national fire service. Historically LFB have been instrumental in the national incident command arena and this strategy will ensure we continue to play a major role on the national stage. Given our unique and complex built environment, the diversity and volume of incident types and the vast number of incidents being attended every day, the Brigade can be a significant contributor to the development of incident command excellence once again.
47. This strategy brings the opportunity and ability to approach things differently and be innovative and bold in our approach, with key influential work streams such as:
- a) National Operational Learning
 - b) Operational assurance
 - c) Analytical risk assessment process
 - d) *NOG integration process*

Communications

48. It is recommended that the Incident command policy team works with the Central Communications Team, to ensure effective interaction with both our internal and external stakeholders, providing a clear overview and regular updates on the delivery of the transformation of incident command and the development of leadership within the LFB.
49. In addition to the above, wider use of the LFB Workplace and interaction with the already established 'The LFB Centre for Leadership' group, to deliver shared messages and a consistent approach.

Costs

50. The logistics related to the implementation of the in-house incident command delivery team mentioned above are currently being considered. Funding for this team was identified in the Transformation reserve (£433k - 20/21, £577k – from 2021/22). After further consideration of the requirements for such a team it is proposed its structure will be 1 x Group Commander, 1 x Station Commander, 3 x Station Officers, 3 x Sub Officers (£553k). This is a slightly different structure to the original proposal (see finance comments below) but offers a more effective solution to deliver the requirements as well as utilising existing resources such as admin more efficiently to reduce cost.
51. All of the identified training should form part of existing and agreed training contract deliverables.

Finance comments

52. This report outlines the strategy for developing incident command within London Fire Brigade. The report notes that a proposal has been submitted to deliver the maintenance of skills courses with the use of an in-house LFB incident command team. Funding for this team of £433k has been included in the Transformation Reserve in 2020/21, with an estimated ongoing cost of £577k from 2021/22. This funding was to cover 2x Group Commander, 2x Station Commander, 2x Station Officer, 1x FRS D and a consultant.

Workforce comments

53. The representative bodies are generally supportive of Brigade initiatives to strengthen incident command capability. Following Operations DB this strategy was sent to the FBU, FOA and Prospect for formal trade union consultation. Comments were received from the FBU and FOA the day before, and on the day of, Commissioner's Board despatch respectively. With regards to incident command specifically, the main thrust of the FBU's comments was to question flexibility and operational discretion, with a preference expressed for prescriptive operating procedures. The FBU's comments will be responded to, which references the Brigade's alignment with National Operational Guidance, and which confirms that consultation and engagement with the FBU in relation to the NOG integration project will continue. FOA's comments will also be responded to; these are not fundamental, and generally seek clarification on aspects of the documentation.

Legal comments

54. Under section 9 of the Policing and Crime Act 2017, the London Fire Commissioner (the "Commissioner") is established as a corporation sole with the Mayor appointing the occupant of that office. Under section 327D of the GLA Act 1999, as amended by the Policing and Crime Act 2017, the Mayor may issue to the Commissioner specific or general directions as to the manner in which the holder of that office is to exercise his or her functions.
55. Section 1 of the Fire and Rescue Services Act 2004 states that the Commissioner is the fire and rescue authority for Greater London.
56. The statutory basis for the actions proposed in this report is provided by section 7 of the Fire and Rescue Services Act 2004, under which the Commissioner must secure the provision of personnel, services and equipment necessary to efficiently meet all normal requirements for firefighting.
57. This report informs the Board of the changes to be made to the Brigade's strategy in this area. Detailed costing and procurement activity are to be the subject of a further report.

Sustainability implications

58. A Sustainable Development Impact Assessment (SDIA) was completed on 18 March 2020. This showed negligible impact on resource sustainability from any of the recommendations contained within this review, as any services supplied following this review will be through existing contracts.
59. Additionally, any revision of an operational policy or procedure or training programme will be subject to individual sustainable development (environmental) impact assessments (SDIA). The incident command strategy will enhance understanding of environmental protection across all incident command roles in the Brigade. The Sustainable Development team have been consulted as part of the SDIA, and further consultation will take place if recommendations are accepted and delivery commences.

Equalities implications

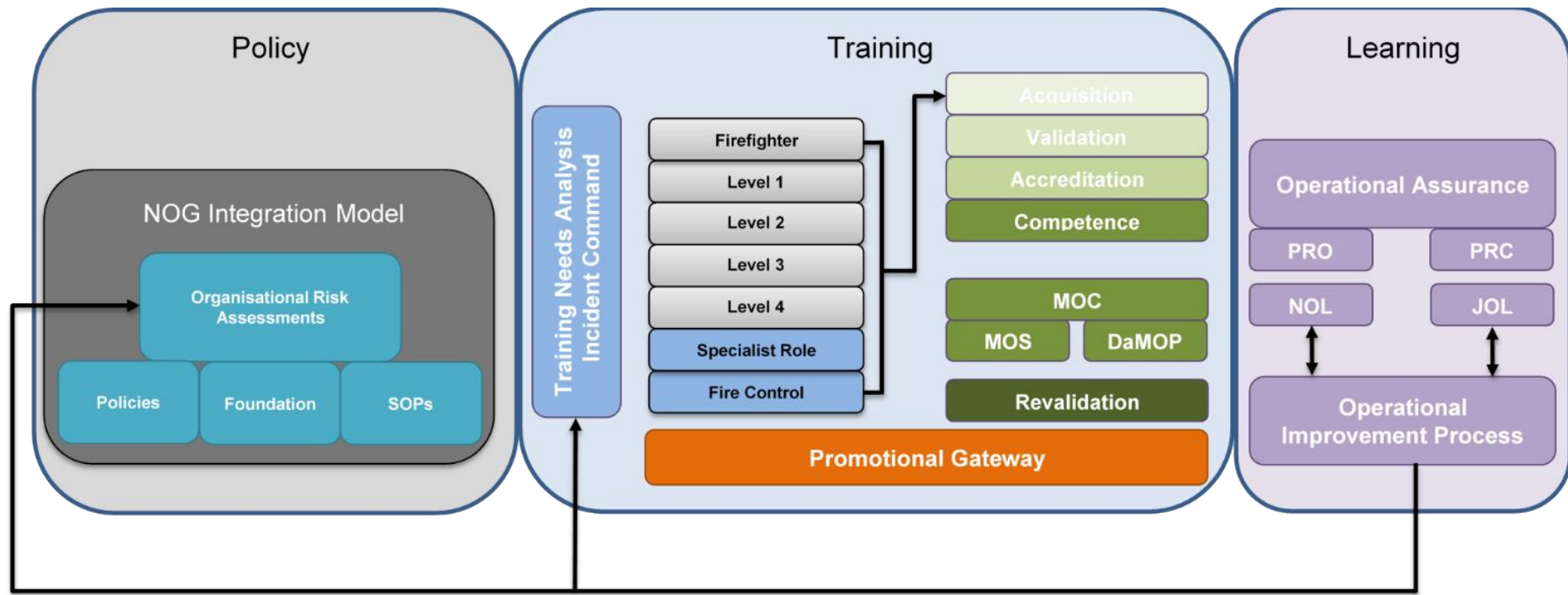
60. The London Fire Commissioner and decision takers are required to have due regard to the Public Sector Equality Duty (s149 of the Equality Act 2010) when exercising our functions and taking decisions.

61. 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.
62. 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.
63. The Public Sector Equality Duty requires us, in the exercise of all our functions (i.e. everything we do), 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.
64. 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.
65. 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.
66. 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, and
 - promote understanding.
67. The Inclusion team have been consulted and initial discussions have been positive regarding this strategy. Further consultation will follow with the Support Groups at LFB including; Black & Ethnic Minority Members (B&EMM), United MINDs, Fairness – BAME Group, LGBT+ – Sexual Orientation and Gender Identity / Expression, Women in the Fire Service (WFS), and the Women Advisory Committee (WAC).
68. It has been highlighted that this strategy will produce separate policy work streams and those work streams will also be subject to individual equality impact assessments.

List of Appendices

Appendix	Title	Protective Marking
1.	Incident Command Strategy framework	None

Appendix 1



Incident Command Strategy Framework