



LONDON FIRE BRIGADE

LFC-25-034

LFB Protective Security Strategy

Report to:

Service Delivery Board
Commissioner's Board
London Fire Commissioner

Date:

19 March 2025
02 April 2025

Report by:

Assistant Commissioner Operational Resilience & Control

Report classification:

For decision

For publication

Values met

Service
Integrity
Teamwork
Equity
Courage
Learning

I agree the recommended decision below.

Andy Roe

London Fire Commissioner

Date

**This decision was remotely
signed on 15 April 2025**

PART ONE

Non-confidential facts and advice to the decision-maker

Executive Summary

London Fire Brigade (LFB), as a critical national asset and a key part of London's emergency response infrastructure, faces a complex and evolving threat landscape. To address these challenges and ensure the safety of its personnel, assets, and operations, LFB is implementing a comprehensive Protective Security Strategy. This strategy aligns with the UK Government's Security Policy Framework (SPF) and the Fire and Rescue Protective Security Strategy, while also supporting national objectives, including the CONTEST counter-terrorism strategy.

The Protective Security Strategy is built around three core workstreams—Physical Security, Personnel Security, and Cyber Security—and is underpinned by robust governance and oversight. These elements ensure a unified approach to identifying, assessing, and mitigating security risks, safeguarding critical infrastructure, and maintaining operational resilience.

DECISION OPTIONS

Recommended decision

That the London Fire Commissioner approves the Protective Security Strategy attached as Appendix 1 in part two of the report.

1 Introduction and background

- 1.1 In an era of evolving threats and increasing complexity in emergency response operations, it is essential for LFB to implement a comprehensive Protective Security Strategy. This strategy ensures the safety and security of personnel, facilities, and critical assets while maintaining efficient public service. It also contributes to the UK Government's CONTEST counter-terrorism strategy, reinforcing national efforts to reduce the risk of terrorism. Central to the success of this strategy is robust governance and the alignment of the three protective security workstreams: Physical, Personnel, and Information (Cyber) Security.
- 1.2 LFB operates in a high-risk environment where it faces threats ranging from terrorism and cyber-attacks to physical security breaches. Its critical role in emergency response and public safety makes it a key component of national security infrastructure. These evolving risks highlight the need for a holistic protective security approach that integrates governance and aligns key protective security workstreams.
- 1.3 Currently there is no structure that meets this need, allowing the protective security workstreams to work in silo, generating the risk of lack of continuity and awareness on the delivery and oversight of protective security mechanisms.

2 Objectives and expected outcomes

2.1 The implementation of the Protective Security Strategy will deliver a robust, coordinated, and governed approach to mitigating security risks. The strategies governance structure enables accountability and oversight while integrating Physical Security, Personnel Security, and Information (Cyber) Security into a unified approach led by a dedicated Protective Security Operations (PSO) department.

2.2 Key outcomes include:

- Governance and accountability: Establishment of clear governance structures to oversee protective security efforts, ensuring accountability and strategic alignment with organisational and national priorities.
- Integrated security workstreams: Alignment of Physical, Personnel, and Cyber Security workstreams led by PSO to create a cohesive security posture, addressing vulnerabilities holistically.
- Enhanced resilience: Strengthened ability to prevent, respond to, and recover from incidents, including terrorism, cyber threats, and physical security breaches.
- CONTEST: Active contribution to the Protect and Prepare pillars by safeguarding critical infrastructure and maintaining readiness for terrorism-related incidents
- Operational continuity: Protection of critical systems, assets, and personnel, ensuring uninterrupted service delivery and public safety.
- Personnel safety and awareness: Comprehensive measures to safeguard staff, supported by targeted training, awareness initiatives and testing and exercising.
- Cyber resilience: Enhanced security of data and digital systems to mitigate cyber threats, ensuring the integrity of critical information and communication networks.

2.3 By integrating governance and aligning the Physical, Personnel, and Information (Cyber) Security workstreams, the Protective Security Strategy will serve as the foundation for a resilient and secure Brigade. It will enable LFB to proactively address modern security challenges, support national efforts under the CONTEST strategy, and uphold its mission to protect lives, property, and the public.

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 Brigade values which build on and do not detract from the Code of Ethics.

3.2 The Brigade values are reflected within the strategy document. The recommended decision to accept the strategy document align with and further the Brigade values.

3.3 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

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.

4.8 An Equality Impact Assessment has been completed. None of the protected characteristics will be disadvantaged by this strategy. For this reason, no mitigating action plan is required. EIA attached as Appendix 3.

5 Other considerations

Workforce comments

5.1 The purpose, function, responsibilities, and duties of the Protective Security Strategy to be reviewed by the Deputy Commissioner following one year of implementation and every year thereafter, as detailed in Protective Security Strategic Board (PSSB) - Terms of Reference (Appendix 2). This will continue to ensure any impacts on the workforce are addressed as a priority.

Sustainability comments

5.2 Sustainable Development Impact Assessment has been completed and submitted. The Protective Security Strategy is delivered alongside the current organisational framework, negating any additional impacts on the use of LFB resources and the environment.

Procurement comments

5.3 The strategy has no procurement implications.

Communications comments

5.4 Communication for the delivery and implementation of a new Protective Security Operations team will be delivered by the use of Hotwire.

5.5 A dedicated Protective Security Hotwire page will inform and maintain all guidance and relevant policies.

5.6 Strategy document to be shared with Heads of Service alongside Terms of Reference for board members.

6 Financial comments

6.1 There are no direct financial implications relating to the paper. The Chief Finance Officer has reviewed this report and has no comments.

7 Legal Comments

7.1 Under section 9 of the Policing and Crime Act 2017, the London Fire Commissioner (the "Commissioner") is established as a corporation sole with the Mayor appointing the occupant of that office. Under section 327D of the 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.

7.2 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").

7.3 The Civil Contingencies Act imposes a duty on the LFC to plan for additional things outside the normal scope of work as follows:

This Act requires an FRA, as a category 1 responder, defines an emergency to include:

- (a) an event or situation which threatens serious damage to human welfare in a place in the United Kingdom,
- (b) an event or situation which threatens serious damage to the environment of a place in the United Kingdom, or

The FRA must therefore (under s1(1) CCA 2004):

- (a) from time to time assess the risk of an emergency occurring,
- (b) from time to time assess the risk of an emergency making it necessary or expedient for the person or body to perform any of his or its functions,
- (c) maintain plans for the purpose of ensuring, so far as is reasonably practicable, that if an emergency occurs the person or body is able to continue to perform his or its functions,
- (d) maintain plans for the purpose of ensuring that if an emergency occurs or is likely to occur the person or body is able to perform his or its functions so far as necessary or desirable for the purpose of—
 - (i) preventing the emergency,
 - (ii) reducing, controlling or mitigating its effects, or
 - (iii) taking other action in connection with it,
- (e) consider whether an assessment carried out under paragraph (a) or (b) makes it necessary or expedient for the person or body to add to or modify plans maintained under paragraph (c) or (d),
- (f) arrange for the publication of all or part of assessments made and plans maintained under paragraphs (a) to (d) in so far as publication is necessary or desirable for the purpose of—
 - (i) preventing an emergency,
 - (ii) reducing, controlling or mitigating the effects of an emergency, or
 - (iii) enabling other action to be taken in connection with an emergency, and
- (g) maintain arrangements to warn the public, and to provide information and advice to the public, if an emergency is likely to occur or has occurred.

7.4 Under section 7 of the Fire and Rescue Services Act 2004 the Commissioner has the power to secure the provision of personnel, services and equipment necessary to efficiently meet all normal

requirements for its functions. Furthermore, in accordance with Section 5A Fire and Rescue Services Act 2004 (FRSA 2004), the Commissioner, being a 'relevant authority,' may do 'anything it considers appropriate for the purposes of the carrying-out of any of its functions...'.

7.5 This report sets out how the LFC fulfills the above functions in relation to Protective Security.

List of appendices

Appendix	Title	Open or confidential*
1	London Fire Brigade Protective Security Strategy	Confidential
2	Protective Security Strategic Board (PSSB) - Terms of Reference	Confidential
3	Metropolitan Police Hostile Mind-Set Assessment (HMAT)	Confidential
4	Equality Impact Assessment	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: YES



LONDON FIRE BRIGADE

Full Equality Impact Assessment (EIA) Form

When completing this form please use the [EIA guidance notes](#) and check our other resources on our dedicated [EIA Hotwire pages](#)

Part one

You will only be required to complete a full EIA assessment if:

- a) as a result of completing the initial screening form, potential adverse impacts have been identified in an area of your activity requiring adjustments
- b) you are starting, reviewing or changing any major activity (e.g. a strategy, programme or campaign)

The purpose of an EIA is to meet and justify the legal obligation required under the [Public Sector Equality Duty](#) (PSED), namely, the 'DUE REGARD' that documents that your activity will:

- a) eliminate discrimination, harassment, and victimisation;
- b) advance equality of opportunity; and,
- c) foster good relations between people who share a relevant protected characteristic and people who do not share it.

In your full EIA, you are only required to complete an assessment of any negative impacts. You must be able to show that your activity meets the three conditions of the due regard by providing relevant information to show how it caters for people with protected characteristics (where applicable), through eliminating potential discrimination and promoting opportunities to build equity between all groups.

A. Title and expected outcomes of the activity

LFB Protective Security Strategy.

The London Fire Brigade (LFB), as a critical national asset and a key part of London's emergency response infrastructure, faces a complex and evolving threat landscape. To address these challenges and ensure the safety of its personnel, assets, and operations, the LFB is implementing a comprehensive Protective Security Strategy. This strategy aligns with the UK Government's Security Policy Framework (SPF) and the Fire and Rescue Protective Security Strategy, while also supporting national objectives, including the CONTEST counter-terrorism strategy.

B. Who is this activity for, who is impacted by it? (all LFB staff, specific department, external communities)

All LFB staff.



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Full Equality Impact Assessment (EIA) Form

C. Reason for Equality Impact Assessment

Please select one from the following:

- New activity.

D. Team responsible for the activity

EIA Author(s):

Name: Jamal Stern

Job title: Station Officer

Department: Operational Resilience

EIA Owner(s) - individual in charge of the overall activity:

Name: Patrick Goulbourne

Job title: Assistant Commissioner

Department: Operational Resilience & Control

E. What other policies/documents are relevant to this EIA? (Please hyperlink each document, policy, and guideline referenced below)

[Protective Security PN 851](#)

[Security for London fire Brigade premises PN 011](#)

[Public Sector Equality Duty](#)

[Equality Act 2010](#)

Your London Fire Brigade – [Our plan for 2023-2029](#) (CRMP)

LFB [Values](#)

[Inclusive and accessible documents for neurodivergent individuals – tips and resources 2024](#)

[The LFB key EDI terminology](#)



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F. Equality and diversity considerations

Describe the ways how your activity meets the conditions of the due regard of the PSED and how LFB employees and communities of London may be affected by your activity, especially those ones with protected characteristics. Explain whether your activity may disproportionately affect any groups with a protected characteristic listed under the Equality Act 2010.

You must make sure to list any sources you have used to complete your analysis.

- **Age**

Out of 4712 operational staff members, most are aged between 40-49 - 39.26% with 0.08% under 20, 11.18% 20 – 29, 29.86% 30 – 39, 14.81% 50 – 54, 3.78% 50 – 59, 0.89% 60 – 64 and 0.13% 65 +.

The project has no age restrictions and is applied regardless of age; therefore, any disproportionate impact is eliminated. It provides an opportunity for all to enact and therefore is accessible and inclusive.

- **Gender**

Out of 4712 operational staff members 10.29% are female and 89.71% are male. The project is gender neutral, has no gender restrictions and is applied regardless of sex; It provides an opportunity for all to enact and therefore is accessible and inclusive.

- **Gender Reassignment**

There are no statistics held for gender reassignment within LFB. We recognise that there may be a negative impact on staff who have undergone, and are undergoing, gender reassignment, but this risk has been successfully mitigated. The project has no gender reassignment restrictions and is applied regardless of gender status; It provides an opportunity for all to enact and therefore is accessible and inclusive.

- **Marriage and civil partnership**

There are no statistics held for marriage and civil partnership within LFB. However, the project has no marriage or civil partnership restrictions and is applied regardless of relationship status; therefore, any disproportionate impact is eliminated. It provides an opportunity for all to enact and therefore is accessible and inclusive.

- **Race including ethnicity and nationality**

Out of 4712 operational staff members 80.45% are white, 15.58% are Black, Asian, and other underrepresented Ethnic, 1.06% preferred not to comment and 2.89% of the workforce's data was not provided. The project has no race, ethnicity or nationality restrictions and is

Full Equality Impact Assessment (EIA) Form

applied regardless of race, ethnicity, and nationality; therefore, It provides an opportunity for all to enact and is accessible and inclusive.

- **Religion or belief**

Out of 4712 operational staff members 31.03% are Christian, 1.25% are Buddhist, 0.36% are Hindu, 0.30% are Jewish, 1.74% are Muslim, 0.30% are Sikh, 3.48% follow other religions, 41.26% have no religion, 2.53% preferred not to say and 17.76% of data was not provided. The project has no religion or belief restrictions and is applied regardless of religion or belief; therefore, any disproportionate impact is eliminated. It provides an opportunity for all to enact and therefore is accessible and inclusive.

- **Sexual orientation**

Out of 4712 operational staff members 71.33% are heterosexual, 5.84% are LGB, 2.29% preferred not to say and 20.50% of data was not provided. The project is applied regardless of sexual orientation; therefore, any disproportionate impact is eliminated. It provides an opportunity for all to enact and therefore is accessible and inclusive.

- **Pregnancy and maternity**

The project is pregnancy and maternity neutral, has no pregnancy and maternity restrictions and is applied regardless of pregnancy and maternity; therefore, any disproportionate impact is eliminated. It provides an opportunity for all to enact and therefore is accessible and inclusive.

- **Disability**

Out of 4712 operational staff members 7.92% have a disability, 88.43% have no disability, 0.72% preferred not to say and 2.89% of data was not provided. The project is disability neutral and is applied regardless of disability; therefore, it provides an opportunity for all to enact and is accessible and inclusive.

- **Caring responsibilities**

The project has no caring responsibility restrictions and is applied regardless of status; therefore, any disproportionate impact is eliminated. It provides an opportunity for all to enact and therefore is accessible and inclusive.

- **Socio-economic backgrounds**



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The project has no socio-economic restrictions and is applied regardless of status; therefore, any disproportionate impact is eliminated. It provides an opportunity for all to enact and therefore is accessible and inclusive.

G. Evidencing Impact: please answer the following four questions:

G1. (a) List all stakeholders and organisations (internal/external) you have consulted or contacted regarding your activity, making sure to seek feedback from groups that may be the most impacted by the activity.

Operational Resilience & Control
Business Continuity
Legal Services (internal)

(b) Explain the insights gained, how you have/will evaluated and whether you intend to conduct a follow-up or seek post-activity feedback from those stakeholders/organisations?

This is a directorate from the Assistant Commissioner Operation Resilience & Control and work has been undertaken by the Station Officer.
Strategy to be reviewed by governance boards and then reviewed yearly by Dep. Commissioner.

G2. Clearly record any gaps in evidence which has limited this assessment being completed in full.

Consider whether you can justify continuing the activity without this information, or if a mitigating action plan is required?

The LFB does not currently monitor staff data in relation to nationality, gender reassignment, marriage, civil partnership, caring responsibilities, or socio-economic background, therefore a breakdown of data could not be presented. However, even without percentages none of the protected characteristics for which data is not held will be disadvantaged by this project. For this reason, no mitigating action plan is required.



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<p>G3. Clearly record the following:</p> <p>a) any adjustments you have considered putting in place for people with protected characteristics and,</p> <p>b) any activity to promote equity of access, opportunity, experience and outcomes?</p>	<p>a) None of the protected characteristics will be disadvantaged by this strategy. For this reason, no mitigating action plan is required.</p> <p>b) Online safety is covered in an annual e-learning package carried out by all staff. LFB have <u>Policy number 0944 - Social media policy for London Fire Brigade</u> which also details online safety recommendations. <u>policy number 0851 - protective security</u> section 11, details extensive advice on protecting your personal security, including online and social media. This strategy has been written in a gender neutral and non-discriminative to disability, age, race, cultural, religious, socio-economic and sexual orientation, format.</p>
<p>G4. Clearly record how you will communicate the activity to those involved, especially if their protected characteristic may be a factor. You may need to consider diverse formats such as audio, large print, easy read, and other accessibility options in various materials?</p>	<p>2425305963Inclusive and Accessible Documents for Neurodivergent Individuals - Tips and Resources 2024 which both demonstrate language, layout and accessibility guidance to be used to create an inclusive document.</p>
<p>H. Mitigating action plan (where an adverse impact has been identified, please record the steps that are being taken to mitigate or justify it?)</p>	
<p>Protected characteristic</p>	<p>Action being taken to mitigate or justify</p>
<p>Race including ethnicity and nationality.</p>	<p>No adverse impact has been identified.</p>
<p>Gender</p>	<p>No adverse impact has been identified.</p>
<p>Disability</p>	<p>No adverse impact has been identified.</p>
<p>I. Mitigation Plan Owner</p>	



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<p>Name: Patrick Goulbourne Job title: Assistant Commissioner Department: Operational Resilience & Control</p>	<p>Review date: N/A</p>
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Full Equality Impact Assessment (EIA) Form

Part two: Inclusion team to complete - feedback and recommendations

J. EIA Outcomes

☐ **Recommendation 1:**

No adverse impact(s) identified - activity continues with no change required

K. Feedback

Please specify the actions required to implement the findings of this EIA and how the programme/ activity's equality impact will be monitored in the future. It may be helpful to complete the table.

Name: EIA Team

Sign-off Date:

07/03/2025

Recommendation 1: No changes are required, as the assessment confirms that the strategy is robust and does not disadvantage any protected characteristics.

The Equality Impact Assessment (EIA) for the **LFB Protective Security Strategy** resulted in **Recommendation 1**, indicating that no modifications are necessary due to the strategy's strong consideration of diverse colleagues and its alignment with operational effectiveness. The strategy upholds compliance with the **Equality Act 2010** and demonstrates due regard for the **Public Sector Equality Duty (PSED)**.

Online safety is comprehensively covered through an **annual e-learning package** for all staff. Additionally, **LFB Policy 0944 – social media Policy** provides guidance on online safety, while **LFB Policy 0851 – Protective Security (Section 11)** offers extensive advice on personal security, including online and social media safety.

This strategy has been developed in a **gender-neutral and non-discriminatory format**, ensuring inclusivity across **disability, age, race, culture, religion, socio-economic background, and sexual orientation**.

For future EIA submission:

Utilise Hotwire resources library for Equality, Diversity, and Inclusion



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Full Equality Impact Assessment (EIA) Form

	<p>updates. This repository provides valuable information on data and supporting charities.</p> <p>Link: Equality, Diversity and Inclusion Resources</p>
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