LFC – 26-038

Assessment of Risk for London 2026

Report to: **Date:**

Risk and Assurance Board ..... 15 April 2026
Commissioner's Board.....6 May 2026
Deputy Mayor's Fire Board .....30 June 2026
Audit Committee.....23 July 2026
London Fire Commissioner

Report by:
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Authorising Head of Service:
Tom Goodall, Assistant Commissioner, Head of Risk, Assurance, Strategy and Portfolio

Report classification:

For Decision

For publication

Values met

Service
Integrity
Teamwork
Equity
Courage
Learning

I agree the recommended decision below.

Jonathan Smith
London Fire Commissioner

Date **This decision was remotely signed on 9 July 2026**

PART ONE

Non-confidential facts and advice to the decision-maker

Executive Summary

The Assessment of Risk for London (AoR) provides the annual update on the risks facing London and the incidents to which the London Fire Brigade may be required to respond. It informs the London Fire Commissioner's (LFC) approach to reducing risk, as set out in the Community Risk Management Plan (CRMP) and its six service strategies: Prevent, Protect, Respond, Prepare, Recover and Engage.

This assessment includes the changes to the risk profile identified in the updated AoR for 2026 as well as an "Horizon Scan," which details plausible extreme manifestations of identified risk up to 2030, to allow longer term planning.

Following approval of the updated AoR;

- Heads of Service should ensure they understand the updated risk picture and review their strategies with a view to developing future departmental plans and necessary budget bids/resource allocation to meet any emerging risks (especially capability gaps) so that planned activity remains appropriate.

- The Head of Strategy and Planning should review the AoR to determine whether amendments to the CRMP are required.

- The Head of Portfolio should review the AoR to assess whether any adjustments to the Prioritisation Framework are necessary.

- The Head of Risk will work with Heads of Service to identify any risks requiring escalation to the corporate risk register.

Recommended decision – For the London Fire Commissioner

That the London Fire Commissioner accepts the recommendation of the Risk and Assurance Board to approve the AoR 2026 as reflecting the LFC's understanding of risk for London within the scope set out in the AoR Policy.

1 Introduction and background

1.1 The London Fire Brigade (LFB) operates in a demanding risk environment and is accountable to a wide range of stakeholders, including London's communities, and both central and local Government.

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 2026 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 based on the updated assessment.

1.3 The AoR is distinct from the Corporate Risk Register (CRR). The AoR considers outward-facing risks in the community and foreseeable hazards that may require a Brigade response, or that may affect the Brigade's ability to respond. The CRR takes an inward-facing organisational view. Where community risks identified in the AoR present significant organisational impact or reveal capability gaps, these may be escalated to the CRR.

1.4 The layered structure of the assessment is intended to identify all foreseeable risks in both day-to-day and reasonable-worst-case manifestations. Layer four of the assessment uses scenario planning techniques and forecasting tools to explore future development of risks and plausible extremes. The Horizon Scan provided in layer four details plausible extreme manifestations of identified risk up to 2030 to allow longer term planning.

1.5 The AoR does not introduce new control measures. Mitigations are defined through existing strategies, departmental plans, policies, and local risk management arrangements.

2 Key Findings

2.1 The summary below outlines the principal insights identified through this year's multi-layered analysis and highlights the implications for the Brigade's services.

2.2 **Public Perceptions and Community Risk:** Public concern regarding crime typically exceeds concern regarding fire service-related risks. Among those who do express concern about fire, the predominant focus is on fires in purpose-built flats, aligning with the Brigade's own data, which identifies these properties as higher risk. This underscores the need for the Brigade to maintain strong, targeted fire-safety messaging around high-rise residential buildings and to prioritise purpose-built flats within its community prevention work.

2.3 **Geopolitical Factors and Malicious Risk:** The current geopolitical climate has heightened anxiety within some communities regarding malicious acts, including terrorism. The Brigade should consider how best to offer public reassurance about its readiness to respond to terrorist incidents. It would also be beneficial to articulate the Brigade's wider role in supporting community safety and countering extremism through partnership working with the police, local authorities, and other agencies, potentially through BRMPs.

2.4 Capacity Under Normal Operating Conditions: Projections over the next five years indicate increases in certain incident types; however, these changes are not expected to exceed the Brigade's routine capacity. As such, the Brigade can remain reasonably confident in its ability to deliver a high standard of service to Londoners under normal operating conditions.

2.5 Increasing Demand for Certain Incident Types: The requirement to deliver rescue in a broader range of incidents may lead to increased demand. Rising demand in incident categories such as "collapsed behind locked doors" and "persons threatening to jump" signals potential requirements for enhanced training or additional support for firefighters. These incident types involve complex physical and mental ill-health demands which firefighters have increasing exposure to. Persons threatening to jump, whether from buildings, or other structures often involve the implementation of safe working at height practices to resolve.

2.6 Increasing Complexity of Built Environment: The rapid adoption of new fuels, technologies and modern construction methods continues to reshape risk in the built environment at a pace that often exceeds the speed of regulatory development and oversight. New fuels including lithium-ion batteries are now commonplace throughout London in domestic, commercial and industrial settings. As innovation advances more quickly than the frameworks designed to govern it, this creates potential long-term exposure to systemic vulnerabilities and an elevated likelihood of emerging fire behaviours, particularly within complex premises, tall buildings and other high-risk structures. These shifts contribute to increasingly complex risk profiles across the built environment. As a result, the Brigade may need to consider the development of additional specialist capabilities to ensure it can effectively assess, prevent and respond to incidents arising from these evolving challenges.

2.7 Resilience to High-Impact, Low-Frequency Events: Although the Brigade is well positioned to manage normal day-to-day demand, there remains a credible risk of resource depletion during prolonged extreme-weather events, such as extended periods of extreme heat or significant flooding. The London Risk Assessment provides valuable scenarios that the Brigade should incorporate into its testing and exercising programmes to strengthen readiness for such high-impact, low-frequency incidents.

2.8 Preparedness for Simultaneous Events: The Brigade's operating environment is inherently complex, and it is plausible that multiple major events could occur concurrently, for example, a protracted high-rise fire, extreme climate conditions, and a civil disturbance. The Assessment of Risk should therefore also inform preparation for multi-incident scenarios, ensuring resilience under simultaneous operational pressures.

2.9 Potential Future Resilience Requirements: Scenarios developed up to a planning horizon of 2030 indicate LFB may be required, within this timeframe, to deliver wider civil resilience, national resilience arrangements or support Home Defence. This would be in line with established frameworks such as the Civil Contingencies Act or relevant to new legislation. Should these demands occur, they will interact with the impacts of climate, demographic, and built environment change described in the plausible 2030 operating environment. They will not be isolated from them. Such considerations should be integrated into the Brigade's testing and exercising frameworks to ensure operational readiness for emerging threats.

3 Detailed analysis reports.

3.1 To provide a robust assessment of all foreseeable risks, the AoR is structured in four, "layers." Each layer presents a different type of risk information for a specific purpose and audience. Although the layers are presented separately for clarity, the same risk may appear in more than one layer.

3.2 Appendix one provides a summary report that sets out the key findings from 2026's assessment of risk by layer. This report is intended to provide a quick reference regarding the highest risks. The summary report also sets out the approach and structure of the wider assessment. Further information and context is available in the detailed report for each layer.

3.3 Appendix two, contains the detailed report for, Layer One Public Concern and Public Risk Perception. This assessment layer reflects the level of concern expressed by the public about different risks. This will not necessarily reflect the measured frequency or severity of incidents but may be an early indicator of change. Public concern will also be influenced by factors such as the recency and visibility of risks, such as notable fires locally or in the news.

3.4 Appendix three, contains the detailed report for; Layer Two Data Lead Assessment of Ordinary (commonly occurring) Risks. This assessment layer considers frequent incidents, such as dwelling fires in purpose-built flats. These occur relatively regularly and can result in casualties, often affecting individuals or small numbers of people rather than large numbers in a single incident. This layer also provides tools to understand the geographic disposition of commonly occurring risks.

3.5 Appendix four contains the detailed report for Layer three, Extraordinary risks and reasonable-worst-case scenarios, including London Risk Register. This assessment considers low-likelihood but high-impact events, such as a single, large residential high-rise fire causing many casualties. 2026's AoR includes version 14 of the London Risk Register (LRR), published in 2025. Version 15 is expected to be published by London Resilience in early 2026. The AoR will be updated appropriately once this happens. Review of the unpublished draft indicates that no material change will be needed to the AoR post publication of the LRR.

3.6 Appendix five contains the detailed report for; Layer four Horizon Scanning for new and emerging risks. This assessment layer considers how risks may change or present differently in the future. For example, how the changing built environment may influence the frequency and severity of fires in flats, or how climate change may influence demand.

3.7 Users intending to use the AoR for decision making should access the detailed report for the layer of interest. Where decision making regarding risks from the London Risk Register is required, users should access the detailed scenario descriptions for each risk available to authorized users through Resilience Direct in addition to LFB AoR.

4 Consultation feedback – high level summary

4.1 Consultation on the Draft Assessment of Risk Policy was undertaken with key stakeholders across the Brigade in February and March 2026.

4.2 Stakeholders expressed a concern that the inclusion of e-bike and e-scooter fires within wider risks related to new-fuels and technologies and within fires in buildings more generally did not provide sufficient visibility within the assessment. Lithium-ion fires including e-bikes and e-scooters are now included separately as a "Highlighted Risk," within Layer Two of the

assessment.

5 Expert review of AoR methods and approach.

5.1 The draft AoR 2026 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 robustness and defensibility of the AoR approach and methodology. The Head of Risk, Planning Assumptions, Learning and Exercising, at London Resilience chaired the Panel.

5.2 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.

5.3 The Panel endorsed LFB's AoR 2026 and considers it to represent leading practice. The Panel recommends that it be shared regionally and nationally with other services and agencies. The full, Panel statement is below:

5.4 *"The Panel recognises that, through the Assessment of Risk (AoR), London Fire Brigade (LFB) has continued to develop and strengthen its approach to assessing fire and rescue–related risks in London. LFB's approach demonstrates a strong commitment to engaging London's communities in constructing the community concerns layer, alongside the effective use of internal and external expertise in developing the emerging trends, extraordinary, and future risks layers.The Panel welcomes the clearer articulation of the scope of assessment, the intended users of risk information, the explanation of how the layers complement one another, and the further development of LFB's foresight function (Layer 4), as recommended by the 2025 Panel. The 2026 Panel has made a number of specific and general recommendations to the Brigade. These include consideration of case studies (particularly for Layer 1); greater exploration of the risk implications of frequent and protracted incidents; additional data on scale of response in relation to compartment of origin; and improved understanding of the interaction between layers. The Panel also recommends clearer explanation of the document's evolution (including the previous use of the Three Horizons method and the rationale for moving away from this), and explicit reference to the triangulation methodology used in Layer 1 and the benefits this provides. These enhancements will further strengthen the AoR's robustness, defensibility, and impact. In conclusion, the Panel endorses LFB's 2026 AoR and will continue to work with the Brigade on its future development as it refines and enhances its approach to understanding fire and rescue–related risk in London. The Panel considers LFB's AoR to represent leading practice and recommends that it be shared regionally and nationally with other services and agencies."*

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 This report proactively supports the Brigade values as follows:

- Service: The AoR prioritises the needs and concerns of London's communities by incorporating public risk perception as the first layer of assessment. This ensures that planning, prioritisation and resource allocation are informed by the lived experiences of the public and reflect the risks Londoners identify as most significant
- Integrity: The AoR promotes transparency and accountability by inclusion of the AoR methodology, making the assessment publicly accessible, and establishing processes for external challenge. These measures ensure openness in how risks are identified, analysed and prioritised, thereby strengthening trust between the Brigade and London's communities.
- Teamwork: The AoR is developed through extensive collaboration across LFB teams and with wider partners, including the London Resilience Forum and subject matter experts. Publicly shared scoring mechanisms and multi-agency perspectives ensure that risk assessments reflect collective expertise and support coordinated planning.
- Equity: The layered assessment approach recognises that risk varies across circumstance, location, exposure and incident type. Using methodologies that reflect heightened vulnerability alongside pan-London data sets and public perception data allows a nuanced risk understanding. This informs resource decisions that are proportionate to differing levels of need.
- Courage: The AoR demonstrates organisational courage through its commitment to assess low-frequency, high-impact scenarios and emerging future risks alongside day-to-day demand. This includes analysing reasonable worst-case events, conducting horizon scanning and modelling plausible future scenarios that may test the Brigades' response arrangements. This allows the Brigade to prepare to respond to complex and uncertain risks and to avoid a, "failure of imagination," leading to organisational under preparedness.
- Learning: The AoR reflects a continuous learning approach to assessing risk in London by drawing on public engagement, national methodologies, operational and international learning, partner input, and external expert scrutiny. The inclusion of independent expert review ensures that methods, assessments and assumptions remain robust, defensible, and aligned with 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 thePublic 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 equality impact assessment (EIA) has been conducted and updated for the 2026 Assessment of Risk, appendix six. An EIA was also conducted specifically for public engagement carried out in support of production of the layer one assessment. This is included as appendix seven.

8 Other considerations

Workforce comments

8.1 There are no immediate consequences on the workforce arising from this report, however the implementation of new control measures or reallocation of resources based on the AoR's

findings may have implications in the future and/or require consultation with representative bodies.

Sustainability comments

8.2 There are no known sustainability implications arising from this report.

Procurement comments

8.3 There are no known procurement implications arising from this report.

Communications comments

8.4 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.

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 Assessment of Risk Policy 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 2026. 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 2026 Summary Report	Open
2	Detailed report: Layer One, Public Concern and Public Risk Perception.	Open
3	Detailed report: Layer Two, Data Lead Assessment of Ordinary (commonly occurring) Risks	Open
4	Detailed report: Layer Three, Extraordinary risks and reasonable- worst-case scenarios, including London Risk Register.	Open
5	Detailed report: Layer Four, Horizon Scanning for New and Emerging Risks	Open
6	EIA Assessment of Risk 2026	Open
7	EIA Assessment of Risk 2026 Public Engagement	Open
8	Assessment of Risk Methodology	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