

Revised Policy Framework

Report to:

Service Delivery Board
Commissioner's Board.....
London Fire Commissioner

Date:

24 June 2026
7 July 2026

Report by:

Andy Mobbs – ICT Head of Information Governance

Report classification:

For decision

For publication

Values met

Integrity

I agree the recommended decision below.



Jonathan Smith
London Fire Commissioner

This decision was remotely
Date **signed on 17 July 2026**

PART ONE

Non-confidential facts and advice to the decision-maker

Executive Summary

This report seeks approval for a revised Policy Framework for the London Fire Brigade. The Framework establishes a clear and consistent approach to the development, approval and management of policy tools, including policies, procedures, strategies and guidance. It introduces a structured lifecycle, clarified roles and responsibilities, and strengthened governance arrangements. The revised Framework addresses risks associated with inconsistent policy development and supports lawful, transparent and effective decision-making.

Recommended decision

For the London Fire Commissioner

The London Fire Commissioner approves PN0370 Policy Framework for the LFB's use.

1 Introduction and background

- 1.1 The London Fire Brigade (LFB) last reviewed its approach to managing policies and procedures in 2008 (CMB 60/08 *Review of Orders and Instructions – proposed way forward*). At that time, the existing "instructions" system was considered fragmented, inconsistent and difficult to use. A significant proportion of content was outdated, duplicated, or unclear in status (for example, whether it was advisory or mandatory). The response was the introduction of a combined Policies and Procedures framework, bringing mandatory policies and procedures together within a single structure. This framework also established clear ownership, with Heads of Service responsible for policy tools, and introduced a fixed mandatory review cycle of three years.
- 1.2 Eighteen years later, policy governance has again become less consistent, alongside significant changes in the environment in which LFB operates. These include the increased use of digital systems, the implementation of service strategies and departmental business plans, and the full integration of National Operational Guidance for operational activities. Organisational development, together with audits of the policy framework by MOPAC (February 2023) and Business Assurance (October 2025), led the LFB Risk and Assurance Board to commission a

comprehensive review and redesign of LFB's policy framework.

- 1.3 A fundamental rethink of the framework has been undertaken to update the approach to policy governance. This has included engagement with key stakeholders and alignment with statutory expectations, audit findings and corporate governance requirements. The revised Policy Framework introduces a clear structure for policy tools, establishes consistent document standards, and defines approval, assurance and maintenance arrangements.
- 1.4 The new framework "**PN0370 Policy Framework**" is attached as **Appendix 1**.
- 1.5 To demonstrate how organisational procedures fit alongside policy in the new framework, the accompanying "*PN0370-01 Procedure for managing business management policy tools*" is attached as Appendix 2 [note, this is not within scope for a decision for this report].

2 Objectives and expected outcomes

- 2.1 The objective of this proposal is to introduce a clear, proportionate and consistent framework for policy governance across the Brigade.
- 2.2 The expected outcomes are:
 - a coherent structure for policy tools, with clear distinction between strategies, policies, procedures and guidance
 - improved clarity of roles, responsibilities and approval routes in line with the Scheme of Governance
 - strengthened assurance arrangements through proportionate monitoring and the role of the Policy Scrutiny Group
 - improved consistency, accessibility and control of policy documentation through standard templates and records management arrangements
- 2.3 Collectively, these outcomes will reduce organisational risk, support compliance with statutory and regulatory requirements, and improve the transparency and reliability of decision-making across LFB.

Implementation and transition arrangements

- 2.4 The revised Policy Framework will be implemented progressively. There will be no "big bang" transition from the existing arrangements.
- 2.5 All current policies and procedures will remain valid and continue to operate. As new policies are developed, or where existing policies undergo significant review or amendment, they will be rewritten using the new templates and structures and will be issued in accordance with the revised Framework.
- 2.6 Minor amendments to existing policies within the current framework will continue to be permitted where these improve clarity, correct errors or update technical detail. This approach avoids placing unnecessary burden on Policy Owners and maintains continuity of existing documents during the transition period. These changes will not require full re-drafting under the new Framework.
- 2.7 Where a policy is subject to more substantial review, Policy Owners will be expected to adopt the revised Framework. This includes applying the appropriate policy tool, structure and governance arrangements.
- 2.8 As part of the transition, Policy Owners may also determine that an existing policy is no longer

correctly classified. Where a document is better expressed as a procedure or guidance rather than a policy, it should be re-categorised accordingly. In such cases, the document will be removed from the formal policy framework where appropriate and managed under the relevant tool type.

- 2.9** This incremental approach ensures that the Framework is embedded in a proportionate and sustainable way, while maintaining continuity of existing policy tools and avoiding unnecessary disruption.

3 Values Comments

- 3.1** The proposed Framework supports the Brigade's value of **Integrity** by establishing clear, transparent and consistent arrangements for policy development and governance. It ensures that decisions are made in accordance with defined authority, supported by evidence, and subject to proportionate scrutiny. By improving clarity and consistency in policy tools, the Framework enables staff to act with confidence and accountability, supporting honest and transparent engagement with colleagues, partners and the public.

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 The revised Policy Framework embeds consideration of equality by requiring Policy Owners to complete Equality Impact Assessments where appropriate and to consider the impact of policies on different groups during development, consultation and review. This ensures that equality considerations are embedded throughout the policy lifecycle rather than addressed retrospectively.

4.9 No adverse equality impacts have been identified in relation to the approval of the Framework itself.

5 Other considerations

Workforce comments

5.1 The LFC's staff side unions have been provided with a copy of the framework for comment. Feedback received ahead of the report being despatched has been incorporated, or if rejected are listed below. Any feedback received after despatch will be presented orally at the meeting.

5.2 Workforce feedback received, but not incorporated into the report/policy:

- None

Sustainability comments

5.3 There are no sustainability matters arising from this report.

Procurement comments

5.4 There are no procurement matters arising from this report.

Communications comments

5.5 The LFB Internal Communication Team have advised that the guidance text for LFC report writers (below) is appropriate for this report.

Where the proposed recommendation(s) will have an impact on people or service provision, for example a new or amended policy, the report author should set out how this will be communicated both internally to staff and/or externally to service users or recipients.

Below is a set of principles to help authors when drafting the Communications section.

- *What – do you need to communicate? Be clear on what exactly it is you are wishing to communicate.*
- *Why – do they need to know it? Is this just for information or do you want some action as a result, and what are those actions?*
- *Who – needs to know? Who are your primary audiences, this should never say everyone, prioritise your audiences as this will help with the when and how?*
- *When – do they need to know? Is this information critical to people's job's, is there a timeframe when this needs to be communicated by?*
- *How – is it best for them to receive it? What are the best channels to reach your audience? This will often be via multiple channels and that could include verbal briefings.*

You should discuss communications about the recommendations in this report with one of the following heads in the Communications and Engagement Department well in advance of the dispatch date. They will liaise with other colleagues in the department, including the Head of Community Engagement if necessary, and add comments to the report.

- *Prevention, Protection and Policy – Head of Stakeholder Engagement.*
- *Preparedness and Response – Head of External Communications.*
- *Enabling services (including Corporate Services, Transformation) – Head of Internal Communications.*

6 Financial comments

6.1 There are no finance matters arising from this report.

7 Legal Comments

7.1 This report was despatched early, and before comments from General Counsel could be included. The GC representative will provide comments at the meeting as necessary.

List of appendices

Appendix	Title	Open or confidential*
1	PN0370 Policy framework - draft	Open
2	PN0370-01 Procedure for managing Business Management policy tools <i>[for information only – not for approval]</i>	Open

Background papers

CMB 60/08 Review of Orders and Instructions – proposed way forward (23 April 2008)

CMB 01/09 Policies and procedures – progress to date (14 January 2009)

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

Policy framework

OFFICIAL

-  External
- X**  Business management
-  Operational

Policy summary

The LFB Policy Framework sets the standards for developing, approving and maintaining all policies, procedures, strategies and guidance across the Brigade. It defines policy tools, clarifies roles and approval routes, and establishes the required structure for policy documents. Informed by statutory duties and inspectorate expectations, the Framework ensures that policy tools are lawful, coherent and consistently applied. Routine governance processes, supported by the Policy Scrutiny Group, provide assurance that the Framework is followed. Overall, it underpins clear, reliable and accountable decision-making across LFB.

Notable changes since last published

This version is a full rewrite of the previous PN0370 policy. It introduces a clear hierarchy of policy tools, defines roles and approval routes, and replaces the old combined policy–procedure model with a structured Framework for policy development, governance and maintenance. It sets new standards for document structure, numbering, assurance, and records management, and aligns LFB policy practice with statutory expectations, modern governance requirements and sector best practice.

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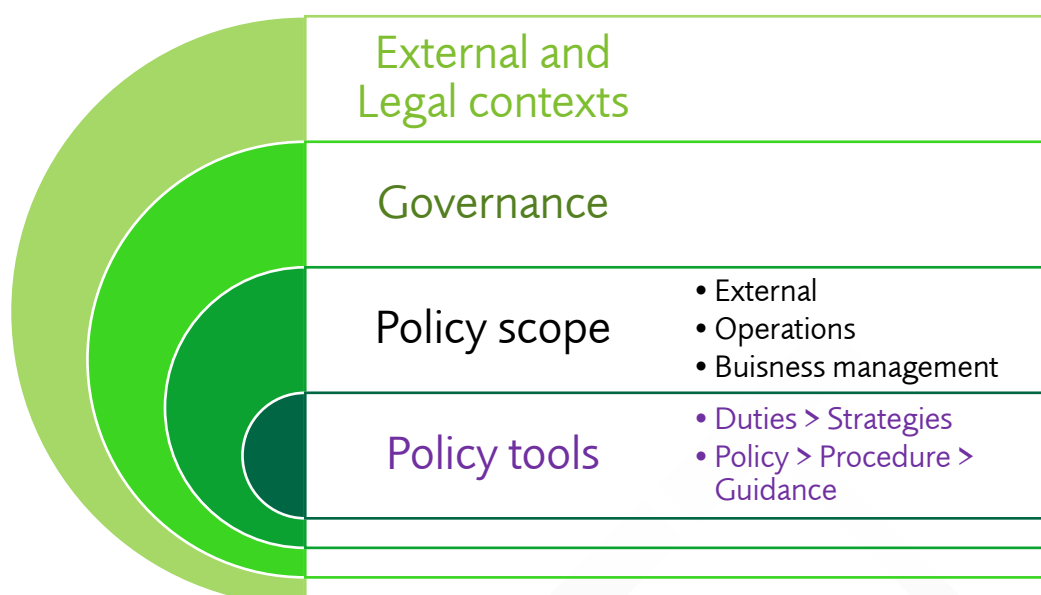
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1. Purpose

- 1.1 The London Fire Brigade (LFB) operates within a complex statutory and governance framework shaped by national legislation, professional standards and the oversight arrangements of the London Fire Commissioner (LFC) as a corporation sole. Policies, procedures and related governance documents are the means through which LFB translates these legal duties, strategic priorities and organisational values into clear, consistent expectations and actions across the organisation.
- 1.2 The London Fire Commissioner sets the strategic direction for the Brigade, supported by Greater London Authority oversight and internal assurance arrangements. Within this context, policies provide authoritative guidance for operational and corporate decision-making, ensure compliance with legislation and national standards, and support the effective and consistent delivery of services to London's communities. Policy tools also provide a structured mechanism for delegating responsibilities and enabling managers to activate strategic intent in day-to-day activity.
- 1.3 Poorly defined or inconsistently applied policy tools can lead to variable decision-making, organisational risk and uncertainty for staff, partners and the public. It is therefore essential that policies, procedures and associated documents – as well as roles, approval routes and accountabilities – are clearly articulated and consistently maintained. This enables LFB to meet its statutory obligations, deliver its strategic outcomes and provide reliable, transparent services.
- 1.4 LFB has strengthened its corporate governance arrangements in recent years, with clearer distinctions between different types of policy, improved alignment between organisational strategy and policy development, and greater coordination across corporate and operational directorates. As part of this maturing governance model, a corporate policy function has been established to support the quality, consistency and maintenance of policy documents across the Brigade.
- 1.5 This Policy Framework provides a reference point for all LFB staff involved in developing, approving or implementing policies, strategies, guidance or operational procedures. It explains the types of policy tools available, the purposes they serve, and the accountabilities that apply throughout their lifecycle. Templates, guidance and supporting materials are available on the LFB intranet.

2. Scope

- 2.1 The Policy Framework comprises four core elements that together support coherent, lawful and effective policy development across the Brigade. These elements ensure that LFB policy is grounded in the right statutory context, governed through appropriate internal structures, and clearly distinguished according to purpose and audience.



External and legal contexts

- 2.2 This element reflects the legal, regulatory and external contexts that shape LFB activity. It includes obligations arising from fire and rescue legislation, civil contingencies, health and safety, equality, fraud, information and employment law; national standards and codes of practice; and expectations from oversight bodies such as HMICFRS and the Greater London Authority. Considering this context ensures that policy tools are compliant, proportionate and aligned with national expectations and the rights and needs of the public.

Governance

- 2.3 Governance covers the internal structures, approvals, delegations and accountabilities that apply to policy development, implementation and review. This includes the statutory functions of the London Fire Commissioner, internal Schemes of Delegation, and the corporate assurance and scrutiny mechanisms that monitor policy performance. Strong governance ensures alignment, oversight and consistency across the organisation.

Policy scope

Public focused policy

- 2.4 Externally focused policies set out how LFB provides services, information and support to the public. They define the standards and entitlements that apply when communities interact with the Brigade – for example, information charging, public facing complaints, fire safety engagement, and commitments to accessibility and transparency. These policies promote fairness and consistency in LFB's engagement with London's communities. facing complaints, fire safety engagement, and commitments to accessibility and transparency. These policies promote fairness and consistency in LFB's engagement with London's communities.

Operational focused policy

- 2.5 Operational focused policies – which are the LFB's National Operational Guidance aligned documents – set expectations for firefighting, rescue, prevention, protection and control activities. They are aligned to the principles and methodology of National Operational Guidance and translate risk based strategic intent into clear frontline practice. These policies support safe, effective and consistent

operational delivery and provide an auditable link to national doctrine and professional standards. based strategic intent into clear frontline practice.

Business management policy

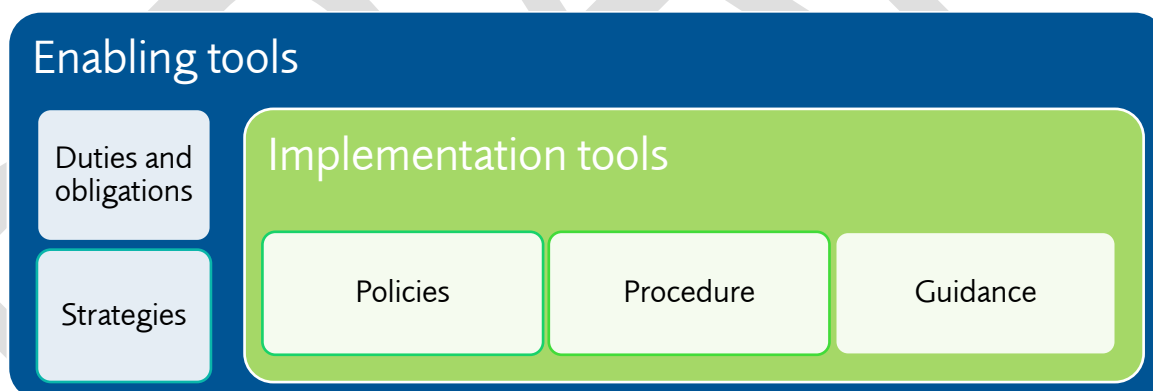
- 2.6 Business management policies govern internal organisational standards, behaviours and processes. They apply to staff and contractors and cover areas such as information governance, HR, finance, procurement, internal conduct, records management and the use of systems. These policies ensure consistent practice, reduce organisational risk and support effective management across departments.

Policy tools

- 2.7 The Policy Framework uses a set of policy tools to provide direction, interpret requirements and support consistent action across the Brigade. These tools operate at different levels of formality and detail, ranging from broad strategic intent to specific operational instruction. Together, they ensure that LFB's work is aligned, lawful and clearly understood.

Policy tools

- 2.8 This Framework uses the term policy tools to describe the different kinds of controlled documents the Brigade relies on to set standards and explain how work is done. Policies, procedures, guidance, and strategies are all policy tools. They are not technical tools but organisational instruments for defining expectations, responsibilities, and methods of working.
- 2.9 The policy tools operate at different levels of purpose, formality and detail. They are grouped into two categories: tools that enable direction and define required standards, and tools that implement those standards in practice. Together, these tools ensure that LFB's work remains aligned with statutory expectations, organisational priorities and consistent operational delivery.



Enabling tools

- 2.10 Enabling tools set the strategic, legal and contextual foundations upon which all other policy tools are built. They establish the direction the organisation must follow and the obligations it must meet, ensuring that subsequent policies and procedures are grounded in the right requirements.
- 2.11 Enabling tools comprise:
- **Duties and obligations** – reflect the legal, regulatory and external requirements that LFB must comply with, including statutory duties, mandated standards, national doctrine and inspectorate expectations. Some obligations may be interpreted through a policy, while others can be implemented directly through procedures without requiring a standalone document.
 - **Strategies** – set out LFB's long-term direction and desired outcomes, whether organisation-wide or for a specific function. They describe what we aim to achieve and why, helping prioritise activity and guide organisational decision making.

- 2.12 Enabling tools ensure that policy development is aligned with strategic intent, compliant with statutory requirements and informed by national expectations.

Implementation tools

- 2.13 Implementation tools translate strategic intent and statutory obligations into practical organisational action. They define LFB's commitments and set the mandatory processes staff must follow and support informed judgement in delivering services.
- 2.14 Implementation tools comprise:
- **Policies** – state LFB's intentions and direction, as formally expressed by senior leadership, and set the organisational principles that underpin consistent decision making. In an operational scope, these are called Strategic Policies.
 - **Procedures** – define the specified method for carrying out an activity or process, setting out the mandatory steps required to meet a policy or statutory/ external obligation.
 - **Guidance** – provides supporting information that aids understanding and assists personnel in applying policies and procedures; it does not prescribe mandatory requirements. In an operational scope, these are called Operational Information Notes.

Policies

- 2.15 Policies express LFB's commitments and intentions. They explain what the Brigade will do and the principles that guide organisational decision making. Policies translate strategies and statutory obligations into consistent expectations and create a stable foundation for organisational practice.
- 2.16 Policies are appropriate when LFB needs to:
- set a clear organisational position or commitment
 - ensure consistency across departments or functions
 - interpret a statutory obligation where broader implications exist
 - provide a foundation for multiple procedures or guidance resources

Procedures

- 2.17 Procedures describe the steps, actions and criteria that staff must follow to implement a policy or meet a statutory or external obligation. They provide the practical detail needed for consistency, assurance and audit, making clear who needs to do what, when and how.
- 2.18 Procedures in LFB may operate at two levels:
- **Organisational procedures** – Apply across more than one team or department or establish consistent practice for the Brigade as a whole. They require appropriate consultation and corporate governance because they create shared expectations and may affect multiple parts of the organisation.
 - **Local procedures** – Apply within a single team or department and describe how that area manages its own activity. They require appropriate local approval but generally involve less formal governance.
- 2.19 Both types of procedure set mandatory actions; the distinction lies in scope and governance, not drafting style.
- 2.20 A procedure sets out how a piece of work should be carried out in practice. In some cases, this will take the form of a precise, sequential set of steps that must be completed in order. In other cases, a procedure may describe a collection of actions, checks or considerations that need to be followed, but

where the order is not fixed and professional judgement is required in applying them. Both forms are recognised within the Framework, and both serve to ensure consistency, clarity and operational reliability.

Guidance

- 2.21 Guidance supports good judgement and informed decision making. It provides advice, examples, reference information and considerations that help staff apply policies and procedures in practice. Guidance is not mandatory; it may accompany a policy or procedure or standalone where flexibility is required. Guidance helps staff interpret requirements in a range of situations without prescribing fixed steps. Guidance is particularly useful where professional discretion, adaptability or contextual decision making is needed.
- 2.22 Guidance provides users with advice, explanation or technical detail to help them apply policies and procedures effectively. It can take a range of formats, including user manuals, technical notes, organisational explanations, worked examples, or reference materials. While guidance is not mandatory in the same way as a policy or procedure, it still needs to be stored and made accessible in consistent, reliable locations. For LFB this includes the Brigade Wide Document Library, the Operational Knowledge Hub, Hotwire, and any other accessible platforms that ensure staff can easily find and use current versions.

3. Policy Statement

Governance

- 3.1 Governance ensures that LFB's policy tools are properly authorised, proportionate, coherent and aligned with statutory obligations and organisational priorities. It clarifies who has the authority to approve different types of tools, and how advisory scrutiny supports development without creating unnecessary barriers or delay.

Roles in policy development and approval

Approver

- 3.2 The Approver is the senior officer with delegated authority to approve a policy tool. Approvers are set out in the Approvals Matrix (Commissioner, Director or Head of Service). Approvers provide formal authorisation but are not responsible for the ongoing maintenance or review of the tool.

Owner

- 3.3 The Owner is the officer accountable for the accuracy, currency and maintenance of a policy tool throughout its lifecycle. The Owner ensures that development, review and implementation align with this Framework. Owners are typically Heads of Service or Team Leads, depending on the tool type; they are not necessarily the Approver.

Team Lead (as Owner)

- 3.4 For local procedures and guidance, the Owner is the relevant Team Lead. Team Leads ensure their tools are accurate, current, and do not impact other areas of the organisation. If they do, the tool must be escalated and reclassified as an organisational procedure.

Author/Drafter

- 3.5 The Author or Drafter develops or revises a policy tool on behalf of the Owner. They undertake research, drafting, consultation and edits. Authors/Drafters do not hold approval authority.

Decision-making and approval routes

- 3.6 Approval of policy tools is determined by their scope, audience and organisational impact. Decisions are made by the designated Approver (Commissioner, Director or Head of Service) as set out in the Approvals Matrix.
- 3.7 Each tool also has an Owner, who is responsible for developing, maintaining and reviewing the tool throughout its lifecycle. Owners ensure the tool is accurate, current and aligns with this Framework. The Approver authorises the final version; the Owner maintains it.
- 3.8 The Policy Scrutiny Group may provide advice during development, but final approval always rests with the appropriate approver.

Approvals Matrix

Policy tool / Domain	Public-facing	Business Management	Operational
Strategy – service	Commissioner †	---	---
Strategy – enabling	---	Director †	Director †
Policy	Director †	Head of Service	Head of Service
Procedure – organisational	Head of Service	Head of Service	Head of Service
Procedure – local	Head of Service	Team Lead (as Owner)	Team Lead (as Owner)
Guidance	Team Lead (as Owner)	Team Lead (as Owner)	Team Lead (as Owner)

† If a new policy position impacts on significant numbers of staff or customers, or would likely be novel, contentious, or repercussive in nature, then Deputy Mayor prior consultation is also required.

- 3.9 This matrix ensures that decision-making matches the scale of organisational impact and the level of accountability required.

Commissioner-level decisions

- 3.10 Policy tools reserved to the Commissioner – typically service strategies and external/public-facing policies—must follow the Scheme of Governance. These items will normally be considered at Service Delivery Board and Commissioner's Board before approval. Decisions with a significant impact will likely require consultation with the Deputy Mayor for Planning, Regeneration and the Fire Service.
- 3.11 Policy authors should seek advice from General Counsel Governance Team where Commissioner-level approval is likely to apply.

Director and Head of Service decisions

- 3.12 Policies and organisational procedures that fall within a Director's or Head of Service's delegated authority may be approved through Directorate governance arrangements. Corporate board consideration is not required unless:
- the policy is part of a Commissioner decision
 - the subject matter has significant organisational impact or risk
 - the Scheme of Governance requires escalation

Local approvals

- 3.13 Local procedures and guidance are approved within departmental governance arrangements. They remain local unless they:
- create cross-departmental dependencies

- affect or constrain other teams
- present organisational-level risk or liability

3.14 If so, they are reclassified as organisational procedures and follow the organisational approval route.

Impact assessments

3.15 Policy Owners must consider the implications of the proposed policy or change and complete any required formal impact assessments. These typically include:

- Equalities Impact Assessment (EIA)
- Health and Safety impact or risk assessment
- Sustainable Development Impact Assessment (SDIA)
- Data Protection Impact Assessment (DPIA)

3.16 These ensure that policies are lawful, safe, inclusive and proportionate before approval.

Consultation

3.17 Policy Owners must consult with relevant stakeholders to inform the development of the policy and validate its practical application. This may include:

- Internal teams affected by the policy
- Representative Bodies including Trade Unions
- Corporate functions (e.g. HR, Finance, Legal, ICT)

3.18 The level of consultation should be proportionate to the scale and impact of the policy or change. Established Industrial Relations Procedures must be followed where applicable.

Review cycle

3.19 Policies and Organisational Procedures must be formally reviewed at least every three years. This provides a consistent baseline for ensuring that tools approved at Head of Service or Director level remain accurate, relevant and aligned with statutory and organisational requirements.

3.20 Policy Owners may set shorter review cycles where the subject matter requires more frequent assessment. This may apply where tools relate to safety-critical activity, legal or regulatory requirements, high-risk processes, or areas subject to frequent change.

3.21 Local procedures and guidance should be reviewed as appropriate to their purpose and use. These tools are typically maintained within teams, updated more frequently, and subject to more flexible approval arrangements. Their currency should be ensured through ongoing use, supervision and local management, rather than reliance on fixed review cycles.

3.22 All policy tools must be kept under continuous review and updated as required. The existence of a review date does not remove the responsibility of the Owner to ensure that the tool remains current at all times.

3.23 An earlier review must take place where there is a trigger event, including changes in legislation or national guidance, audit or assurance findings, operational or organisational learning, or significant changes to systems, structures or risk.

Amendments to existing policy tools

- 3.24 Policy Owners may make minor amendments to their policy tools without further approval, provided the changes do not alter the underlying policy position or introduce new obligations. Minor amendments include corrections to wording, formatting, clarity, examples and technical updates that do not change meaning or intent.
- 3.25 Where amendments adjust the way a policy is applied, clarify or extend responsibilities, respond to new learning, or require changes to related procedures, the Owner must consider whether the scale and effect of the change remains within their delegated authority. In these cases, Owners are expected to exercise judgement, seek early advice from the Policy Scrutiny Group where appropriate, and ensure that affected stakeholders are aware of the change.
- 3.26 Any amendment that changes the organisation's position, creates new commitments, affects legal compliance, impacts other teams or functions, or would reasonably alter how the public or staff understand their rights or obligations, must follow the full approval route set out in this Framework. Owners must not introduce new policy positions through incremental updates or under the guise of minor amendments.
- 3.27 In short, *changes that alter intent require approval; changes that improve clarity do not.*

The role of the Policy Scrutiny Group

- 3.28 The Policy Scrutiny Group supports high-quality, coherent and consistent policy development across the Brigade. Its role is advisory and enabling; it does not replace or delay formal decision-making.
- 3.29 The Group:
 - offers early advice on new or revised policy tools
 - provides assurance on alignment with statutory duties, strategy and other tools
 - acts as a sounding board for complex issues or new approaches
 - can call in a policy tool for discussion where risks, conflicts or gaps are identified
 - provides non-binding recommendations to the approving officer
 - holds policy tool owners to account for regular document review
- 3.30 The Group's oversight helps maintain coherence within the policy corpus, supports developers during drafting, and strengthens quality without creating unnecessary bureaucracy.
- 3.31 Final responsibility for approval remains solely with the Commissioner, Directors or Heads of Service as set out in the Scheme of Delegation.

Communications

- 3.32 Policy Owners are responsible for ensuring that any changes to their policy tools are communicated in a way that is proportionate to the scale, intent and impact of the amendment. Communication is not a fixed process; it requires judgement about who needs to know, what they need to understand, and whether the change affects expectations, responsibilities or practice.
- 3.33 Communication is an important element of successful policy implementation for policy owners, but it remains the responsibility of staff to be aware of the policies/procedures that impact on their employment and working responsibilities, and for following all prescribed actions.
- 3.34 Minor amendments that improve clarity, correct errors or update technical details normally require only routine internal confirmation and the publication of a revised version in the appropriate document library. Where a change affects how work is carried out, adjusts responsibilities or alters the way a

process is interpreted, the Owner must ensure that those affected are made aware through the most appropriate local or departmental communication routes.

- 3.35 More substantive amendments – particularly those that introduce new commitments, shift organisational standards, or have implications for how LFB interacts with the public – require broader communication. In these cases, Owners should engage Internal Communications and relevant governance leads to agree how the change will be cascaded across the Brigade and, where appropriate, reflected in external-facing information such as website content or public commitments.
- 3.36 The level of communication must always match the level of impact, and Owners must consider communication needs as part of every amendment. The Policy Scrutiny Group will support this by identifying where additional communication may be required as part of its advisory role.

Assurance and monitoring statement

- 3.37 Policy documents must include a short statement explaining how the Owner will know the policy is being followed and whether it is working as intended. This is not a requirement for formal performance measures; it can be met through existing assurance activities such as management checks, audits, training evaluations, or reviews of incidents and complaints. The purpose is simply to ensure that each policy has a clear, proportionate approach for recognising compliance and identifying where further action may be needed.

Records management

- 3.38 Records management ensures that LFB's policy tools are properly controlled, accessible and maintained throughout their lifecycle. All Strategies, Policies and Organisational Procedures (i.e. policy tools that are approved at Head of Service or Director level) are corporate records and must be managed in line with LFB's records management and retention requirements.
- 3.39 LFB's approach to records management for policy tools is based on the principles below. These are mandatory for Strategies, Policies and Organisational Procedures, and advisory for local procedures and guidance.

Authoritative source

- 3.40 Each policy tool must have a single, authoritative version. Policy tools that are corporate records must be stored in the LFB's Brigade Wide Documents SharePoint library managed by the ITC Information Governance Team. Drafts should be maintained within departmental workspaces until approval.

Version control

- 3.41 Version history must be clear, complete and auditable. Once approved, earlier versions are archived to prevent duplication or inconsistent use.

Accessibility

- 3.42 Policy tools must be published in locations accessible to all staff who need them, with consistent routing and metadata so they can be easily found. The Brigade Wide Documents library is the default location for business management policies and organisational procedures, while operational materials are stored in the Operational Knowledge Hub.

Currency and review

- 3.43 Policy tools must be kept up to date. Tool Owners are responsible for ensuring that their tools remain current, are reviewed in line with agreed cycles, and are updated promptly when legislation, learning or organisational changes require it.

Retention and disposal

- 3.44 Historical versions of all Strategies, Policies and Organisational Procedures must be retained permanently. This includes superseded, amended and withdrawn versions. Keeping a complete and accurate historical record is essential for organisational accountability and enables the Brigade to evidence past policy positions, decisions and operational expectations when required. These records may be needed for statutory investigations, legal proceedings, public inquiries, complaints handling, assurance reviews or information rights requests.
- 3.45 Withdrawn or obsolete policy tools must be clearly marked as such and archived within the Brigade Wide Documents library (within a restricted library maintained by the Information Governance Team). They must not remain in active circulation or be used for current operational or business decisions but must remain accessible to authorised staff for audit and evidential purposes.

4. Responsibilities

- 4.1 Clear roles and responsibilities support consistent application of the Framework across LFB. The following outlines the key responsibilities at organisational level. Departments may supplement these responsibilities to suit their structures and workload.

Commissioner

- (a) Holds overall responsibility for the effective implementation and management of LFB's policy tools
- (b) May direct the development of policy or strategy to support strategic priorities
- (c) Approves tools reserved to the Commissioner under the Scheme of Governance

Deputy Mayor for Planning, Regeneration and the Fire Services

- (d) Must be consulted on proposals to introduce or amend any policy or strategy reserved to the Commissioner
- (e) Provides oversight in line with statutory requirements and governance arrangements

Commissioner's Board

- (f) Provides in principle approval for new or amended policy tools that are reserved to the Commissioner
- (g) Ensures alignment with strategic direction and statutory obligations

Policy Scrutiny Group

- (h) Provides structured scrutiny and advice
- (i) Ensures consistency with the Framework
- (j) Advises on consultation requirements, impact assessments, and policy tool selection
- (k) Supports early identification of risks, dependencies, and alignment issues

Directors and Heads of Service

- (l) Identify the need for new or revised tools within their areas
- (m) Ensure tools meet legal, regulatory and strategic requirements

- (n) Oversee dissemination and implementation of new or revised tools
- (o) Approve tools within their delegated authority

Tool Owners

- (p) Oversees the development and review of the tool, including engagement
- (q) Ensures alignment with legislation and statutory change
- (r) Supports readiness for governance and approval
- (s) Oversees implementation and communication of approved tools
- (t) Ensures the tool remains accurate and up to date
- (u) May not necessarily be the document author/drafter
- (v) Notifying ICT Information Governance of any changes to policy and organisational procedures, for records management

Tool authors/drafters

- (w) Leads drafting of the tool
- (x) Coordinates required impact assessments
- (y) Liaises with corporate teams and subject matter experts
- (z) Coordinates consultation feedback
- (aa) Supports quality assurance, review and revision activities
- (bb) Liaising with ICT Information Governance team about any intentions for any new, amended or withdrawn tools.

ICT Information Governance

- (cc) Maintains this Framework and its supporting templates
- (dd) Maintains the central register of policy tools and the Brigade Wide Documents Library
- (ee) Supports directorates in developing, consulting on, and implementing tools
- (ff) Ensures policy tools are accessible through the appropriate platforms (i.e Brigade Wide Documents Library, and the Operational Knowledge Hub)
- (gg) Monitors compliance with review requirements

All staff

- (hh) Responsible for following and complying with the LFB's policies and procedures.

5. Legal and External Contexts

- 5.1 The Policy Framework supports LFB's compliance with a range of statutory, regulatory and governance requirements that shape how public bodies develop, approve and maintain internal policies. As a corporate governance policy, the Framework is informed by legislation governing the London Fire Commissioner as a corporation sole, by sector-wide standards of organisational accountability, and by expectations set by national inspectorates and the Greater London Authority.

- 5.2 The Framework aligns with the Fire and Rescue Services Act 2004, the Fire and Rescue National Framework for England, and associated duties relating to operational guidance, public safety, corporate governance, and organisational efficiency. It reflects the governance and delegation arrangements established under the Policing and Crime Act 2017, including the statutory responsibilities of the London Fire Commissioner for securing the effective, efficient and economic functioning of the Brigade.
- 5.3 More broadly, the Framework supports compliance with legislation governing public administration, equality, transparency and information management, including the Equality Act 2010, the Freedom of Information Act 2000, the Data Protection Act 2018, and obligations under health and safety and employment law where policy clarity is necessary to meet statutory standards. The Framework also takes account of inspectorate expectations, including the governance, assurance and organisational learning themes assessed by HMICFRS, and reflects GLA oversight requirements relating to decision-making, consultation, proportionality and auditability.
- 5.4 Together, these duties and expectations require LFB to maintain clear, current and authoritative policies, procedures and guidance that support lawful decision-making and consistent service delivery. This Framework establishes the governance structures, approval routes, roles and document standards necessary to meet those requirements.

6. Assurance and Monitoring

- 6.1 The effectiveness of the Policy Framework will be understood through the routine governance processes that oversee policy development and maintenance. The Owner will monitor whether new and updated policies comply with the Framework's requirements, including structure, approval routes and document standards. This will be supported by periodic checks of published policy tools and by feedback from policy authors, approvers and governance groups.
- 6.2 The Policy Scrutiny Group provides an additional source of assurance by identifying where policies or procedures are not aligned with the Framework, highlighting gaps, inconsistencies or risks during development, and offering early advice to support compliance. Its observations and recommendations form part of the ongoing assessment of whether the Framework is being applied as intended.
- 6.3 Where the Framework is not being applied consistently, the Owner will identify the causes and recommend improvements. Formal reporting is not required; assurance is achieved through existing oversight and review mechanisms.

Appendix 1: Principles

1. The development, review, evaluation and use of LFB's policy tools – meaning the strategies, policies, procedures and guidance that set direction and support consistent action across the Brigade – are guided by the following principles, where policy must be:

- Relevant
- Effective
- Consistent
- Promotes LFB values
- Evidence based
- Open and accessible
- Safe and risk informed
- Ethical and Inclusive

Relevant

2. Policies and related documents must align with the strategic direction, statutory obligations and priorities of the London Fire Commissioner and the London Fire Brigade. Relevance is ensured through scheduled reviews, updating documents as needed, and withdrawing those that are no longer required.

Effective

3. Policy documents must be viable, risk managed and sustainable. They should support operational and organisational needs, recognise resource implications, and enable proportionate, practical implementation. They must remain adaptable to changes in legislation, risk, technology or service requirements. managed and sustainable. They should support operational and organisational needs, recognise resource implications, and enable proportionate, practical implementation. They must remain adaptable to changes in legislation, risk, technology or service requirements. managed and sustainable. They should support operational and organisational needs, recognise resource implications, and enable proportionate, practical implementation. They must remain adaptable to changes in legislation, risk, technology or service requirements.

Consistent

4. Policy documents should be developed using a systematic, organisation wide approach. Approved templates, clear structures and agreed standards help ensure coherence across the Brigade. Consistency reduces duplication, supports predictable decision making and strengthens organisational clarity approach. Approved templates, clear structures and agreed standards help ensure coherence across the Brigade.

Promotes LFB values

5. Policy documents should actively support and reinforce the Brigade's values. Authors should consider how policy requirements reflect and enable behaviours aligned with the LFB values, including service, integrity, teamwork, equity, courage and learning. Policies should not only set expectations for compliance, but also contribute to a positive organisational culture by embedding these values in everyday practice.

Evidence based

6. Policies and supporting documents should be informed by good analysis, operational learning, audit and assurance findings, staff insight, national guidance and external reviews (such as HMICFRS). Evidence should guide both the creation of new documents and the review of existing ones. Development processes should be collaborative and transparent.

Open and accessible

7. Policy documents should be written in clear, plain language and made accessible to all staff and, where appropriate, the public. Engagement with staff, representative bodies, partners and London's communities should be considered where a document has direct public impact. Openness promotes trust, transparency and accountability.

Safe and risk informed

8. Policy documents should support safe systems of work and reflect LFB's risk based approach to operational and organisational activity. They must consider operational learning, risk assessments and the duty to protect the health, safety and wellbeing of staff and the public.

Ethical and Inclusive

9. Policies and supporting documents must reflect LFB's values, legal duties and commitment to fairness, respect and inclusion. They should consider how decisions and practices affect different groups, remove unnecessary barriers, and contribute to a positive organisational culture.

Appendix 2: Which policy tool do I need?

1. Choosing the correct policy tool is an essential first step in the development process. Using the wrong tool can lead to confusion, inconsistent implementation or unnecessary governance overhead. This section provides practical advice to help Authors and Owners determine whether they need a Strategy, Policy, Organisational Procedure, Local Procedure or Guidance. The decision should always be grounded in the purpose of the tool, the scale of impact, and the level of prescription or flexibility required.

Strategies

2. A Strategy should be selected when LFB needs to set a long-term direction for the organisation or a specific function. Strategies describe what LFB aims to achieve and why, and they establish a framework within which subsequent policies and procedures are developed. They are high-level, outward-looking documents that guide priorities and investment decisions. A Strategy is the right choice where clarity of ambition is required and where the organisation or a functional area needs to express its intent to staff, partners or the public, but where detailed commitments or mandatory actions would be premature.

Policies

3. Policies should be used when LFB needs to establish a clear organisational position or commitment that applies consistently across multiple teams or functions. A policy translates strategic intent or statutory obligations into principles that guide decision-making. Policies do not set out operational steps; instead, they define what the organisation stands by and the expectations that underpin consistent practice. A policy is appropriate where an issue requires corporate alignment, where a statutory duty has wider organisational implications, or where multiple procedures will follow and require a stable foundation. If the question being addressed is "What is LFB's position on this issue?" or "What commitments is the organisation making?", then a policy is likely the correct tool.

Organisational Procedures

4. An Organisational Procedure should be selected when LFB needs to set a mandatory sequence of steps that must be followed by more than one team or across the organisation as a whole. These procedures describe how a policy or statutory obligation must be implemented in practice, defining who must do what, when and how. They are appropriate where consistency, assurance, auditability or safety require a unified approach. An Organisational Procedure is the right tool where different departments rely on the same process, where failure to follow the process could expose LFB to risk, or where the activity directly supports a policy commitment that spans the organisation.

Local Procedures

5. A Local Procedure is suitable when the required steps apply only within a single team or department and do not affect or constrain the workflow of others. These procedures describe how a specific area organises its own activity and allow local flexibility while remaining consistent with overarching policies. They are appropriate where the detail is specific to a single operational, technical or administrative context. However, a Local Procedure must escalate to an Organisational Procedure if it creates cross-departmental dependencies, introduces organisation-wide risk, affects other teams, or becomes a reference point beyond the originating area. Local Procedures allow clarity without unnecessary corporate governance, but must remain aligned to the broader policy environment.

Guidance

6. Guidance is the appropriate tool when staff need advice, examples or factors to consider, but not a mandatory set of actions. Guidance supports judgement and good decision-making in contexts where

flexibility is necessary or where professional discretion is central to the task. It can help interpret a policy or provide practical hints without setting requirements. Guidance is ideal where LFB wants to promote consistency without limiting autonomy, or where the subject matter is too variable or context-specific for a fixed procedure. Guidance must never contradict an approved policy or procedure and must be written clearly to avoid creating accidental mandates.

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Appendix 3: Terms of reference for the Policy Scrutiny Group

Purpose

1. The Policy Scrutiny Group provides proportionate, constructive oversight of new and revised policy tools to support high-quality, coherent and accountable policy development across LFB. Its role is advisory and enabling. It does not hold decision-making authority and does not replace or reduce the responsibilities of Policy Owners or Approvers.
7. The Group exists to help ensure that policy development and amendment follow the Framework, that governance expectations are met, and that policy updates have been effectively communicated to staff.

Role and functions

8. The Group's functions are to:
 - **Provide advisory support during development:** Offer early guidance to Authors and Owners to support alignment with the Framework, avoid avoidable governance issues, and ensure that policy tools are clear, consistent and proportionate.
 - **Review recently approved or updated policy tools:** At each meeting, consider policy tools issued since the previous meeting, focusing on whether:
 - the correct approval route was used,
 - amendments were processed appropriately as minor or major,
 - communications about changes were proportionate and clear,
 - required documentation (including impact assessments and version history) has been completed.

This is a review of governance compliance, not content approval.

- **Identify risks or inconsistencies:** Highlight where policies may:
 - diverge from statutory duties or existing standards,
 - overlap or conflict with other tools,
 - introduce unintended policy positions, or
 - require improved clarity for staff or the public.

Where concerns are identified, the Group may provide recommendations to the Owner.

- **Support organisational awareness of policy changes:** Contribute to a regular Policy Newsletter summarising new policies, significant updates, withdrawals and key changes. This supports staff returning from leave, leaders managing teams, and anyone needing regular visibility of policy developments.
- **Promote continuous improvement:** Identify patterns, recurring issues or opportunities to strengthen policy development, governance and communication practices.

Authority and accountability

9. The Group has advisory status only. It does not:

- approve policy tools,
 - mandate changes,
 - override Owners or Approvers,
 - delay decisions that have been properly made.
10. Accountability for each policy tool remains with:
- the Owner for development, maintenance, review and communication, and
 - the Approver for formal authorisation through the Scheme of Governance.
11. The Group's scrutiny supports but does not substitute these responsibilities.

Meeting frequency and conduct

12. The Group will meet monthly, or bi-monthly where workload is light. Meetings will be scheduled annually in advance.
13. A typical meeting will:
- review policy tools issued since the previous meeting,
 - consider items raised by Authors, Owners or governance teams,
 - agree any advisory recommendations, and
 - identify items of interest for the next Policy Newsletter.
14. Meetings should be concise, proportionate and focused.
15. Papers will be circulated in advance. Notes of the meeting will summarise advice and recommendations; they are not formal minutes and do not create binding decisions.

Membership

16. Membership will be determined by the co-chairs and may be amended from time to time as needs require. Broadly, membership will reflect:
- GC Head of Governance (Co-chair)
 - ICT Head of Information Governance (Co-chair)
 - People Services (for organisational policy matters)
 - Operational Policy / NOG teams (for operational domain matters)
 - Subject matter leads for Impact Assessments (health & safety, sustainable development, equalities)
 - Internal Communications
 - Corporate assurance or audit colleagues
17. Members should be able to provide informed advice on policy development, governance and organisational practice.
18. Attendance may vary depending on agenda items; the Group remains quorate with three members including the Chair.

Escalation and dependencies

19. The Group may recommend that policy tools are:
 - clarified or revised,
 - escalated to a higher Approver,
 - aligned with related policies or procedures, or
 - communicated more widely.
20. Recommendations are advisory. Any required decisions must follow the Scheme of Governance.
21. Significant governance concerns will be escalated to the policy Owner's Head of Service/Director and, where relevant, General Counsel.

Reporting and outputs

22. The Group will:
 - contribute material to the quarterly Policy Newsletter,
 - track thematic issues or recurrent risks in policy development,
 - provide informal annual reflections to the Chief Information Officer as Framework Owner.
23. The Group does not maintain a performance dataset or formal assurance report, as responsibility for effectiveness rests with Owners and existing governance mechanisms.

Appendix 4: Assurance and Monitoring (Guidance for Policy Owners)

1. This guidance is intended to help policy owners decide how they will recognise whether a policy is being followed and whether it is working as intended. The approach should be proportionate to the nature of the policy and should rely, wherever possible, on the assurance mechanisms that already exist within the Brigade.
2. In most cases, compliance can be understood through the ordinary oversight that managers exercise in the course of their work. Routine supervision, informal checks, and discussion at team meetings often provide sufficient insight into whether a policy is being applied consistently. Owners may also draw on findings from internal audits, training evaluations, lessons-learned reviews, complaints, or incident debriefs, where these are relevant. These sources can offer an indication of whether staff understand the policy, whether it is clear and workable, and whether any adjustments might be needed.
3. Some policies may benefit from occasional, targeted checks, particularly where a process is complex or where external bodies expect evidence that controls are being followed. Even then, the emphasis should remain on minimal, practical steps that provide reassurance rather than generating unnecessary reporting or data collection. The purpose of assurance is not to measure performance, but to give policy owners confidence that the policy is functioning as intended and to highlight areas that may require clarification or improvement.
4. Ultimately, the aim is simply to ensure that every policy has a sensible, proportionate method for understanding its effectiveness. Owners should choose an approach that fits naturally with how their area already manages quality, risk and compliance.
5. Policy Owners should seek guidance from Business Assurance if unclear on appropriate assurance methodologies.

Document information

Dates

Issue status	Date
Issued	Click and select date.
Reviewed as current	Click and select date.
Last amended	Error! No text of specified style in document.
Next review due	Click and select date.

Impact assessments

Assessment type	Required Y/N	Last reviewed
Health & Safety impact assessment		00/00/0000
Health & Safety risk assessment		00/00/0000
Sustainability assessment		00/00/0000
Equalities impact assessment		00/00/0000

Audit trail

Listed below is a brief audit trail, detailing amendments made to this policy/procedure.

Page/Paragraph nos.	Summary description of change	Date
Whole policy	Reissued as a new document	00/00/2026

Related procedures

Listed below are all the related policies:

Procedure number	Name of procedure
PN0370-01	Procedure for managing Business Management Policy Tools
PN0370-02	Procedure for managing Operations Policy Tools

Procedure for managing Business Management Policy Tools

Official

Key point summary

This Procedure explains how Business Management policies and organisational procedures are developed, approved, implemented and maintained in line with the LFB Policy Framework (PN0370). It provides a clear, consistent approach for Policy Owners and Authors, ensuring that policy tools are lawful, proportionate and properly governed.

Policy tools are managed through three stages:

- Design – define the need, select the correct tool, confirm the domain, determine whether the work is new or a change, and identify the approval route
- Develop – draft the document, complete impact assessments, consult stakeholders, engage with the Policy Scrutiny Group where appropriate, and obtain approval
- Deliver – communicate, publish and record the approved tool, apply scrutiny and assurance, and maintain it over time

Supplementary guidance is provided to explain how centrally managed Business Management policy tools are supported by the Information Governance Policy Team and the Policy Scrutiny Group at key points in the process.

Throughout the process, Policy Owners remain responsible for ensuring that policy tools are accurate, appropriately approved, clearly communicated, properly recorded and kept up to date.

Introduction

This Procedure sets out how Business Management policy tools are developed, approved, implemented and maintained in accordance with the LFB Policy framework (PN0370). It provides a clear, structured approach for Policy Owners and Authors to follow, ensuring that policy tools are lawful, consistent, proportionate and properly governed.

The Procedure reflects the lifecycle established in the Framework, including requirements for tool selection, governance, impact assessment, consultation, approval, communication, records management and assurance. It is designed to be practical and proportionate, enabling Policy Owners to exercise appropriate judgement while maintaining clear accountability.

Policy tools should be managed through three broad stages:

Design → Develop → Deliver

Each stage groups related activities and helps ensure that policy tools are created and maintained in a structured and consistent way.

Procedure overview

Stage 1: Design

(Need → Tool → Domain → New or change → Approval route)

The Design stage establishes the purpose, scope and governance pathway for the policy tool before drafting begins.

Identify the need

The Policy Owner must clearly define the issue, requirement or risk that the policy tool is intended to address. This may arise from statutory change, organisational priorities, operational learning, audit findings or identified gaps.

Select the appropriate policy tool

The Owner must determine whether the requirement is best addressed through a Strategy, Policy, Organisational Procedure, Local Procedure or Guidance, based on the purpose, scale and level of prescription required.

Confirm the functional domain

The Owner must confirm that the tool sits within the Business Management domain and consider whether there are any public-facing or operational implications that may affect governance, approval routes or communication.

Determine whether the work is new or a change

The Owner must establish whether:

- a new policy tool is required, or
- an existing tool is to be amended.

For amendments, the Owner must determine whether the change is minor, substantive or major, in line with the Framework. Changes that alter intent must follow the full approval process.

Confirm the approval route

The Owner must identify the appropriate Approver and governance route based on the type of tool, its impact and the Scheme of Governance. Where required, early advice should be sought from General Counsel Corporate Governance team or the Policy Scrutiny Group.

Stage 2: Develop

(Draft → Engage → Impact assessments → Consultation → Approve)

The Develop stage is where the policy tool is created, tested and formally approved.

Draft the policy tool

The Author/Drafter prepares the document using the approved template, ensuring that it follows the required structure, is written in clear language, and aligns with the Policy Framework.

Early engagement with the Policy Scrutiny Group

Policy Owners should consider seeking early advice from the Policy Scrutiny Group during the Develop stage, particularly where a policy is new, substantially amended, cross-cutting, or may introduce a new or contentious policy position.

The Group provides advisory input to help ensure that:

- the correct policy tool and approval route have been identified,
- amendments have been appropriately classified as minor or substantive,
- impact assessments and consultation have been considered proportionately, and
- communication expectations are clear.

Engagement with the Group does not replace consultation and does not remove responsibility from Policy Owners or Approvers. Its purpose is to support good governance and avoid avoidable issues prior to formal approval.

Complete impact assessments

The Policy Owner must consider the implications of the proposed policy or change and complete any required formal impact assessments, including:

- Equalities Impact Assessment (EIA)
- Health and Safety impact or risk assessment
- Sustainable Development Impact Assessment (SDIA)
- Data Protection Impact Assessment (DPIA)

These ensure that policies are lawful, safe, inclusive and proportionate prior to approval.

Carry out consultation

The Policy Owner must consult with relevant stakeholders to inform development and validate practical application. This may include:

- affected internal teams
- subject matter experts
- Representative Bodies (including Trade Unions)
- corporate functions (e.g. HR, Finance, Legal, ICT)

The level of consultation must be proportionate to the scale and impact of the policy or change, and Industrial Relations procedures must be followed where applicable.

Seek approval

The completed policy tool must be submitted through the appropriate governance route for formal approval. The Approver confirms adoption; responsibility for the ongoing management of the policy remains with the Owner.

Stage 3: Deliver

(Communicate → Publish → Record → Scrutiny → Assure → Maintain)

The Deliver stage ensures that the policy tool is properly implemented, communicated and maintained over time.

Communicate

The Policy Owner must ensure that changes are communicated in a way that is proportionate to their scale and impact. Minor updates may require only routine notification, while more significant changes require targeted or broader communication. Internal Communications should be engaged where appropriate.

Publish

The approved policy tool must be published in the appropriate location (e.g. Brigade Wide Documents Library), ensuring that staff can easily access the current version.

Record

The Policy Owner must ensure that the policy tool is properly recorded and managed in line with records management requirements. This includes:

- maintaining a single authoritative version
- ensuring version control is clear and auditable
- archiving previous versions appropriately

Scrutiny

Recently approved policy tools may be subject to review by the Policy Scrutiny Group as part of its routine oversight activity. This provides retrospective assurance that governance, impact assessment, consultation and communication requirements have been applied appropriately. The Group's role is advisory and does not affect the validity of the approval or remove responsibility from the Policy Owner or Approver.

Assure

The Owner must apply a proportionate approach to assurance, using existing mechanisms such as management oversight, audit activity, feedback or learning. This ensures that the policy is being followed and is functioning as intended.

Maintain (including review cycles)

The Policy Owner is responsible for ensuring that the policy tool remains current, accurate and effective over time.

For policies and organisational procedures, the Owner must:

- carry out a formal review at least every three years,
- bring the tool forward for earlier review where there is a trigger event (e.g. legislative change, audit findings, organisational learning or significant change), and
- ensure that review dates are recorded and monitored in line with records management arrangements.

For local procedures and guidance, Owners and Team Leads should:

- keep tools under regular, active review through day-to-day use,
- update content as required to reflect changes in practice, learning or local arrangements, and
- ensure that tools remain accurate and fit for purpose at all times.

These tools are intended to be used frequently and updated as needed, and are supported by more flexible approval arrangements. As a result, their currency should be maintained through ongoing management and use, rather than reliance on fixed review cycles.

Maintain

The Policy Owner is responsible for keeping the policy tool current. This includes:

- reviewing in line with agreed cycles
- updating in response to legislative change, organisational learning or emerging risks
- ensuring that withdrawn or superseded versions are clearly identified and archived

Supplementary guidance: Document governance arrangements for Business Management policies and organisational procedures

Business Management policies and organisational procedures are subject to central governance and publication arrangements. This section explains how the Information Governance Policy Team and the Policy Scrutiny Group support the Design → Develop → Deliver lifecycle set out in this Procedure.

It does not replace the core process; it clarifies roles, hand-offs and expectations for centrally managed tools.

Design stage – early engagement and setup

At the outset of the Design stage, Policy Owners should contact the Information Governance Policy Team. Early engagement ensures that:

- the correct policy tool has been selected,
- the Business Management domain has been confirmed,
- the appropriate approval route is identified,
- and any dependencies or governance considerations are understood before drafting begins.

Where a policy is new, substantially amended, cross-cutting, or potentially contentious, Owners should also consider early engagement with the Policy Scrutiny Group. This provides advisory input on governance, classification of amendments, likely impact assessment requirements, and anticipated communication needs.

Early engagement is advisory and does not remove accountability from the Owner or Approver.

Develop stage – drafting, impacts, consultation and approval

During the Develop stage:

- Drafting should use the approved templates provided by the Information Governance Policy Team.
- Amendments to existing tools must be made using tracked changes to ensure an auditable record.

Policy Owners remain responsible for:

- completing required impact assessments,
- undertaking proportionate consultation (including Representative Bodies where applicable),
- and ensuring evidence of both is available before approval.

The Policy Scrutiny Group may be engaged during this stage to sense-check:

- whether amendments are correctly classified,
- whether impacts and consultation are proportionate,
- and whether the proposed communication approach is appropriate.

Once the tool is ready, the Information Governance Policy Team will support final governance checks and progress the document through the agreed approval route.

Deliver stage – communication, publication and records management

Following approval:

- Policy Owners are responsible for determining and delivering appropriate communications.
- The Information Governance Policy Team will:
 - assign policy or procedure numbers (for new tools),
 - update version and review metadata (for amended tools),
 - register the tool centrally, and
 - publish the approved version in the authoritative repository.

Records management requirements are applied at this point to ensure:

- a single authoritative version,
- clear version history,
- and appropriate archiving of superseded or withdrawn documents.

As part of its periodic activity, the Policy Scrutiny Group will review newly issued or updated tools to provide retrospective assurance that governance, impacts and communications have been handled appropriately. Learning from this review may inform future advice and the quarterly policy update communications.



This procedure should be read with:

- PN0370 – Policy framework
- PN0830 - Sustainable development impact assessments
- PN0673 - Risk assessment procedure
- Hotwire guidance on Equality Impact Assessments (EIAs)

DRAFT - For information only