

Recommendations for Local Government Emergency Planning and Resilience for the 2020's

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Executive Summary

Introduction and Background

This review has been commissioned by the Local Authority Panel to assess the status of local authority emergency planning in London. This necessity arises from recognition of the heightened pressure our authorities are facing and increases in risk. The aim of this review is to suggest steps necessary to efficiently reinforce the service and ensure we can continue to provide effective individual and collective leadership on resilience into the 2020's.

The scope of this review includes; Duty London Local Authority Gold arrangements, contingency planning and operational response functions, arrangements supporting collaborative working, and the means of sharing scarce resource. The two elements excluded are; the London Local Authority Gold Resolution and the principle of all 33 chief executives participation in the London Local Authority Gold rota. This is due to their proven effectiveness to underpin the collective and coordinated approach of authorities to significant incidents.

To support this review, *'The review of resilience arrangements in London: interim findings'* produced in 2014 by Matthew Norwell was considered along with Emergency Planning Monitoring Reports and annual Minimum Standards for London assessments. In addition, the thoughts, case studies and anecdotal evidence provided by experienced emergency planning professionals has proven to be extremely helpful.

Overall Assessment

There is a developing trend of reduced capacity and capability across London. The ability of our authorities to discharge a leadership role on resilience to the level communities would expect and deserve is under strain. To prevent further degradation of the service and potentially expose ourselves to undesirable levels of risk, this report suggests a number of actions chief executives may wish to consider to bolster the service and enhance resilience. The recommendations identified during this review aim to:

- Establish a corporate resource of professional advice, support and oversight, where not already established, to support authorities to withstand increasing pressures and ensure chief executives have ready access to high quality corporate advice and support in their localities;
- Strengthen collaborative working to better utilise experience, knowledge and expertise;
- Support a more cost effective and efficient service;
- Increase opportunities to share scarce resource;
- Create a more robust Duty London Local Authority Gold arrangement. which will further compliment our leadership on resilience role and participation at the heart of London strategic coordination;
- Establish a more robust and meaningful assurance process to improve corporate oversight.

Full List of Recommendations

Corporate Policy

Recommendation 1: Consideration should be given to developing a corporate resource of professional advice, support and oversight. This might best be achieved by developing and broadening the role of Emergency Planning Teams to encompass support and oversight of:

- a) Organisational compliance with the Civil Contingencies Act (2004);
- b) Organisational compliance with Minimum Standards for London;
- c) The organisations ability to effectively respond to a localised incident;
- d) The organisations ability to maintain critical services in the lead up to and during emergencies as required by the Civil Contingencies Act and supported by the International Standard for Business Continuity ISO 22301.

To support this aim, consideration should be given to locating emergency planning teams within central directorates or ensure effective lines of reporting and communication are in place to enable them to deliver effective professional corporate level support.

Recommendation 2: To support a co-ordinated and efficient approach to maintaining organisational resilience at a time when efficiencies are imperative, consideration should be given to incorporating business continuity functions into the core duties of emergency planning teams, where this is not already the case.

Governance and Planning

Recommendation 3: Common Standards for London Local Authority Emergency Planning Professionals, reflecting core competencies, should be adopted as a matter of policy by all local authorities and then continuously reviewed to support staff recruitment, development and service delivery.

Recommendation 4: A Sub-Regional Lead Local Authority should be identified to co-ordinate enhanced collaboration and support a more equal contribution and benefit from sub-regional and regional operational and contingency planning. This arrangement should be underpinned by an output based Service Level Agreement and reviewed against clearly defined success criteria every two years.

Recommendation 5: Local Authority Panel Implementation Group (LAP IG) members should accept a more proactive role in:

- a) managing the three year Local Authority Panel Business Plan and co-ordination of sub-regional activity to ensure a balanced distribution of work;
- b) agreeing with respective peers in each sub-regional group the appropriate means of delivering allocated workstreams in accordance with the Service Level Agreement.

Duty London Local Authority Gold Arrangements

Recommendation 6: Local Authority Panel (LAP) membership should carry with it the expectation that members will:

- a) be the local authority representatives on a cadre of multi-agency strategic leads available to Chair Strategic Coordination Groups;
- b) undertake multi-agency training to an accredited standard to prepare them to Chair Strategic Coordination Groups;
- c) step in as London Local Authority Gold (LLAG) when necessary to ensure consistency of representation and ease the transition of Chairing the Strategic Coordination Group from the Metropolitan Police Service or other partner agency to local authorities;
- d) where appropriate shadow the Strategic Coordination Group Chair to ease transition prior to accepting responsibility.

Recommendation 7

All chief executives should wherever possible shadow the current LLAG prior to taking over the role during an incident.

Recommendation 8

All chief executives should attend periodical training events delivered by accredited trainers and participate in a structured exercise programme to prepare them to undertake London Local Authority Gold duties.

Borough Response Capability

Recommendation 9: All local authorities should support the standardisation work currently being progressed and adopt consistent protocols and procedures for core response functions when published.

Recommendation 10: In order to mitigate any reduction in resource available to support an organisational response, a further piece of work should be initiated to consider the means of:

- a) identifying local authority roles which possess the requisite core competencies to support operational response and recovery functions;
- b) identifying the means by which staff undertaking the roles can be incorporated into operational plans;
- c) ensuring staff are available to undertake the requisite level of training and exercises and are released to undertake response roles during emergencies.

Assurance

Recommendation 11: The means by which Minimum Standards for London are formally audited should be agreed by chief executives to offer them the single means by which London local authority emergency planning is accurately assessed.

Recommendation 12: Minimum Standards for London should be realigned to more accurately reflect service requirements:

- a) Immediate Response Capabilities (covering both local and LLAG operations);
- b) Contingency Planning to develop capabilities to deal with acute shocks;
- c) Business Continuity Planning and Corporate Assurance;
- d) Longer Term Resilience Strategies to provide resilience for chronic stresses.

Recommendation 13: All Minimum Standards for London results should continue to be consolidated to offer an annual assessment of capacity and capability and include the means by which urgent concerns can be escalated to chief executives.

Recommendation 14: Greater detail should be added to Minimum Standards for London pertaining to immediate response capabilities, including clearly defined measurable criteria to offer meaningful assurance such as baseline numbers of trained staff, defined response times and length of operation to be sustained, to define the level of capacity and capability to be maintained by local authorities to address local incidents.

Conclusion

Given the heightened challenges that we face and understanding of the pressures on our services, it will be important to move as swiftly as possible to start to put a stronger and more resilient framework in place.

By implementing the steps detailed in this report, capability and capacity will be enhanced, with added strength and depth established locally and regionally. This will ensure all local authorities are in the most resilient condition to efficiently and effectively deliver individual and collective leadership on resilience with confidence, into the 2020's.

Finally, it is understood that the proposals contained in this report will compliment the Lord Harris review but we should anticipate a further short review will be required following the formal release of his findings. This will allow chief executives to be assured that areas additional to those covered by this review or further opportunities to enhance our individual or collective resilience are duly considered.

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Main Report

1. Introduction

In order to provide the reassurance that our communities deserve, this report sets out a series of steps that London chief executives are asked to consider, to strengthen our individual and collective leadership on resilience, at a time of increasing expectations.

This strengthened response is required to help meet the responsibilities placed on authorities, at a time when localities are facing heightened challenges in terms of both security and broader resilience planning. These challenges, including emerging risks such as cyber attack, terrorism and demands presented by the UK Government counter-terrorism strategy (CONTEST) and climate change, come at a time when local authorities face resource constraints which have crystallised in the reduction of staffing resources dedicated to emergency planning.

The recommendations set out in this report provide a framework for planning and response which will allow us to assure local communities, business and partners that local authorities have the necessary capacity and capability to respond to the risks and threats that we face.

2. Background

For some time the Local Authority Panel has been aware of increasing stresses and demands on the emergency planning service. As a result the Local Authority Panel implemented measures to maintain oversight of the changing local authority landscape and the functioning of emergency planning within London. These measures included:

- Commissioning Matthew Norwell in 2014 to review the status of local authority emergency planning in London; see Annex A - Norwell Review Interim Findings and Proposals.
- Review of London Emergency Planning Monitoring Reports collated by London Fire Brigade Emergency Planning;
- Annual review of compliance with Minimum Standards for London.

In anticipation that the stresses and demands will continue to grow, this further review was commissioned.

3. Review Findings and Recommendations

3.1 Corporate Policy

3.1.1. *Emergency Planning Service*

Emergency Planning staffing levels are at the lowest point since 2009, with a downward trend established since the 2012 Olympics, see Fig 3.0 and Fig 3.1. This reduction combined with continuing demand for efficiencies across authorities has the potential to significantly affect our ability to satisfy the expectations of our communities and assure them that we possess the appropriate means to prepare and respond, where necessary, to the myriad of resilience challenges that need to be addressed. This includes our ability to deliver effective authority wide support to our communities and develop a culture of community resilience across our localities.

Fig 3.2 Ratio of Emergency Planning Staff per Head of Residential Population

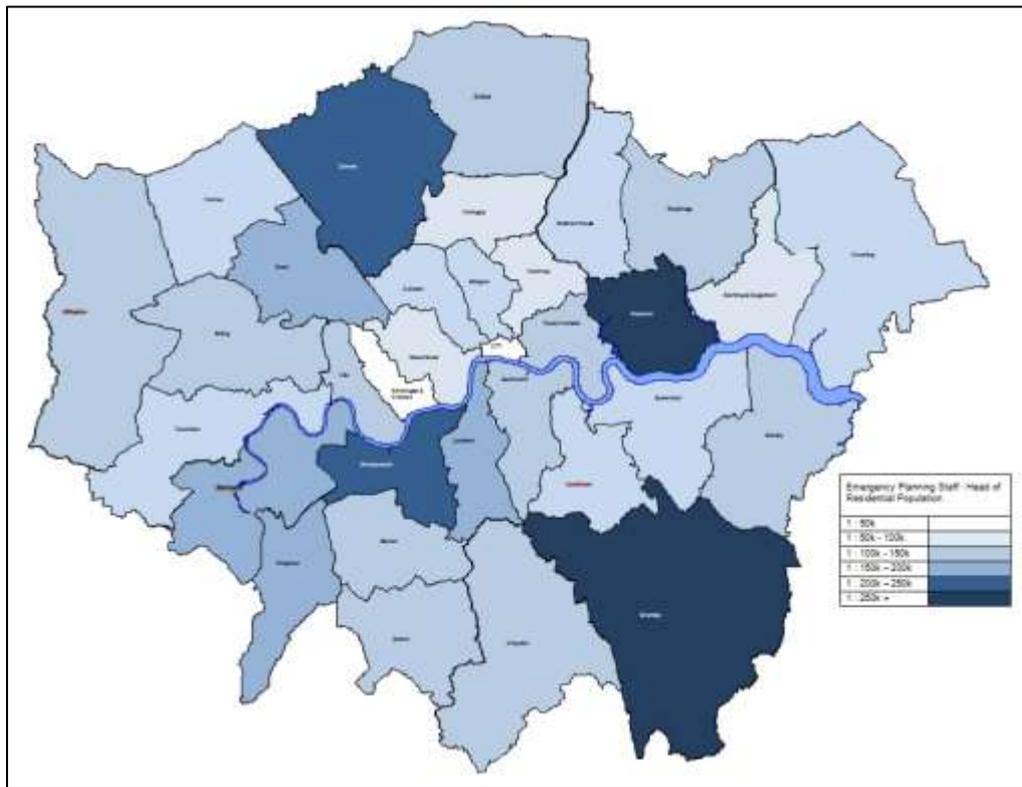
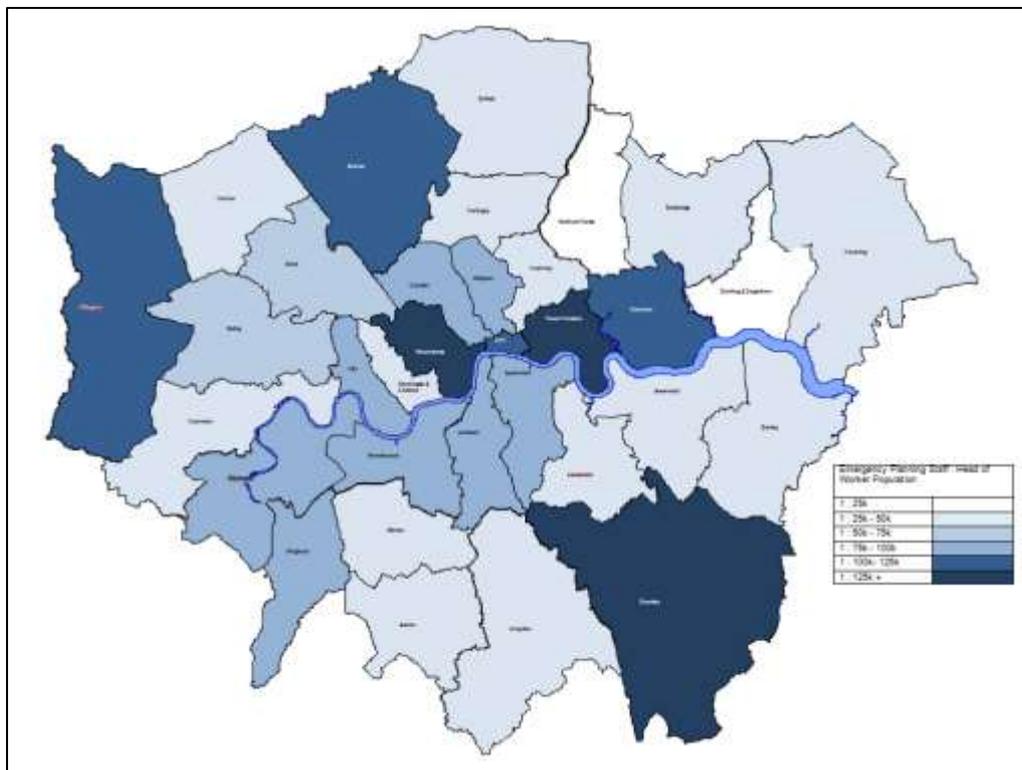


Fig 3.3 Ration of Emergency Planning Staff per Worker Population



Given the need to support our communities in this critical field, chief executives will be mindful of the need for ready access to high quality professional contingency planning advice and support in their localities.

This review has identified that centrally located emergency planning teams may be better positioned to work with and alongside risk management, audit and scrutiny services, in providing a high level of corporate assurance of resilience. By adopting this approach, where not already established, the resilience agenda, including developing a culture of community resilience within localities, will remain close to chief executives. At the same time, central positioning of teams will enhance their corporate oversight of internal structures and changes to the local landscape. This position will also support the delivery of resilience functions through efficient use of corporate resource, people and processes.

Norwell commented in his review: *"It is clear that local authorities should not merely rely on emergency planning teams to manage resilience; instead, an emergency planning team's role should be to ensure that every part of a local authority understands its role and responsibilities in respect of resilience, incident management and business continuity."*

Recommendation 1

Consideration should be given to developing a corporate resource of professional advice, support and oversight. This might best be achieved by developing and broadening the role of Emergency Planning Teams to encompass support and oversight of:

- a) Organisational compliance with the Civil Contingencies Act (2004);
- b) Organisational compliance with Minimum Standards for London;
- c) The organisations ability to effectively respond to a localised incident;
- d) The organisations ability to maintain critical services in the lead up to and during emergencies as required by the Civil Contingencies Act and supported by the International Standard for Business Continuity ISO 22301.

To support this aim, consideration should be given to locating emergency planning teams within central directorates or ensure effective lines of reporting and communication are in place to enable them to deliver effective professional corporate level support.

3.1.2. Organisational Resilience

The importance of our authorities being in the best possible condition to confront internal and/or external acute shocks and chronic stresses is intrinsically linked to our ability to maintain critical services and deliver a resilient response capability to support our communities. With this in mind, chief executives may wish to consider the efficiency opportunity presented by synergies in skills sets between emergency planning and business continuity professionals and the critical relationship that exists between them. By merging functions, if not already done so, opportunities exist to create a common language and single set of processes. Ultimately this would go some way to creating organisational resilience instead of authorities merely possessing business continuity plans.

By adopting this proposal, an integrated and mutually supportive approach to meeting statutory requirements would ensue. This would be further enhanced by adherence to general concepts contained in International Standards for Business Continuity ISO 22301 and reduced corporate risk by creating a single point of assurance for critical resilience within authorities.

Recommendation 2

To support a co-ordinated and efficient approach to maintaining organisational resilience at a time when efficiencies are imperative, consideration should be given to incorporating business continuity functions into the core duties of emergency planning teams, where this is not already the case.

3.1.3 Emergency Planning Personnel

Chief executives will be mindful of the need to ensure their stewardship of the resilience agenda is ably supported by competent and motivated professionals. In light of broadening and complex challenges, an opportunity exists to reflect on the necessary attributes required to offer high quality advice and support in our localities. Building on the considerable experience and knowledge currently held by emergency planning teams, it is proposed that common standards for emergency planning professionals are developed and adopted as a matter of principle by all authorities.

The benefits of this approach include:

- assurance of professional competency;
- high quality and consistent emergency plans and procedures; and
- increased capacity to share professional advice and support during protracted incidents.

Recommendation 3

Common Standards for London Local Authority Emergency Planning Professionals, reflecting core competencies, should be adopted as a matter of policy by all local authorities and then continuously reviewed to support staff recruitment, development and service delivery.

3.2 Governance and Planning**3.2.1 Current Assessment**

Minimum Standards for London were introduced in 2007, comprising 16 standards designed to ensure that all local authorities had the appropriate policies and procedures in place to support the London Local Authority Gold (LLAG) arrangements. In 2009, a second tranche of Standards were published detailing the specific requirements of plans and capabilities each authority should maintain. These plans and capabilities range from generic emergency response functions to humanitarian assistance and excess deaths plans.

A review of Minimum Standards for London assessments conducted annually reveals a minimal downward trend in immediate operational response capabilities. Of concern, however, is a significant downward trend in meeting standards relating to plans and capabilities.

These results demonstrate that available resources are focused on maintaining immediate onset capabilities, such as shelter, evacuation and flooding. Slow onset capabilities, such as pandemic flu and excess deaths, and resource intensive capabilities, such as community resilience and business continuity promotion, receive considerably less attention. See Fig 3.4 and Fig 3.5.

Fig 3.4: Minimum Standards for London (Plans and Capabilities) compliance by year.

Assessment	Green	Amber	Red
Dec-15*	72.93%	24.40%	2.67%
Dec-14*	78.27%	21.07%	0.67%
Dec-13* **	75.05%	24.12%	0.82%
Feb-12 (MSLO)	88.80%	10.70%	0.50%
Jan-11	73.44%	24.48%	2.08%

Note: *Does not include figures for London Borough of Hackney (data not supplied)
 ** No results from LB Tower Hamlets, Newham, Redbridge, Waltham Forest
 (MSLO) represents the assessment of combined Standards (Plans, Capabilities and Operational Response) undertaken in advance of the 2012 Olympic Games.

Fig 3.5: Minimum Standards for London (Operational Response) compliance by year.

Assessment	Green	Amber	Red
Dec-15	94.70%	5.30%	0.00%
Dec-14	95.00%	5.00%	0.00%
Dec-13	97.16%	2.60%	0.00%
Feb-12 (MSLO)	94.71%	4.73%	0.47%

Review of Minimum Standards for London data also reveals synergies between the levels of compliance with Minimum Standards for London (Capabilities and Plans) and the number of Emergency Planning Professionals in London, see Fig 3.6 and Fig 3.7.

Fig 3.6: London Totals – Green ratings for Minimum Standards for London (Capabilities and Plans) across London.

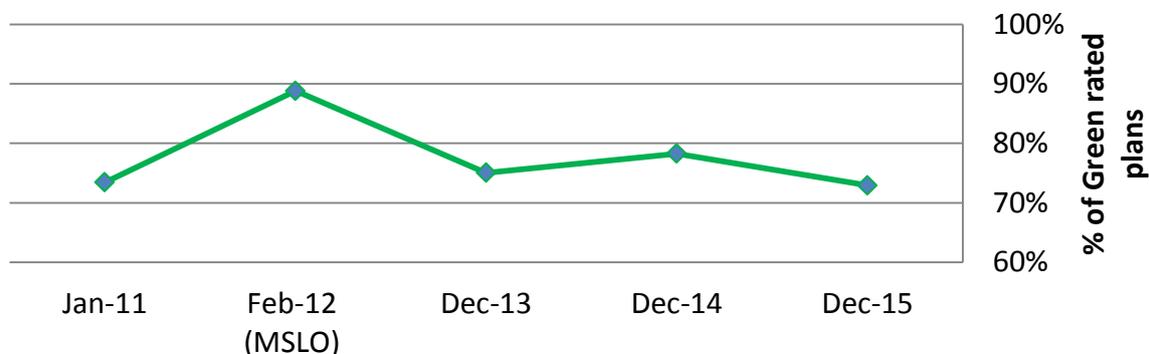
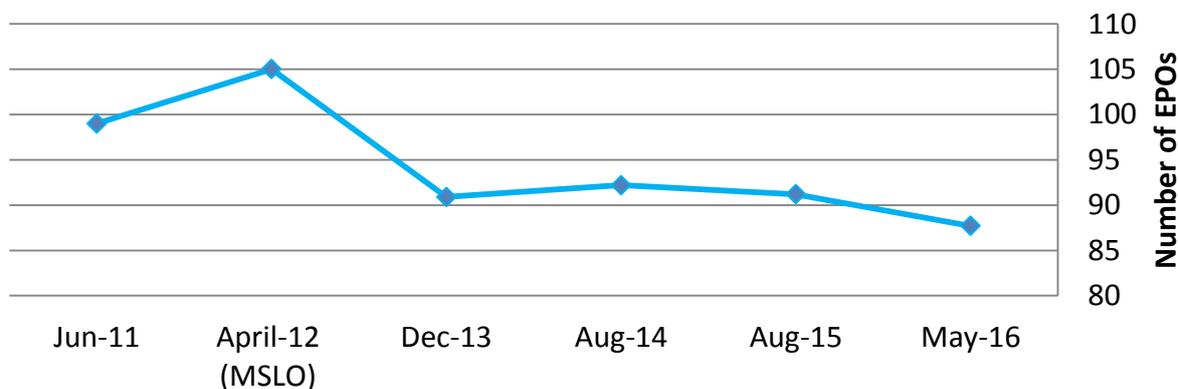


Fig 3.7: London Totals – Number of Emergency Planning Professionals (EPOs) in London.



Note: Data included in Fig 5 and 6 was produced during a review of Minimum Standards for London conducted earlier this year.

3.2.2 Collaborative Working

Historically work to support pan London planning, implement resilience strategies as determined by the Local Authority Panel and shared development of good practice at the local level has been undertaken by emergency planning professionals on an informal basis. This arrangement worked well for a number of reasons:

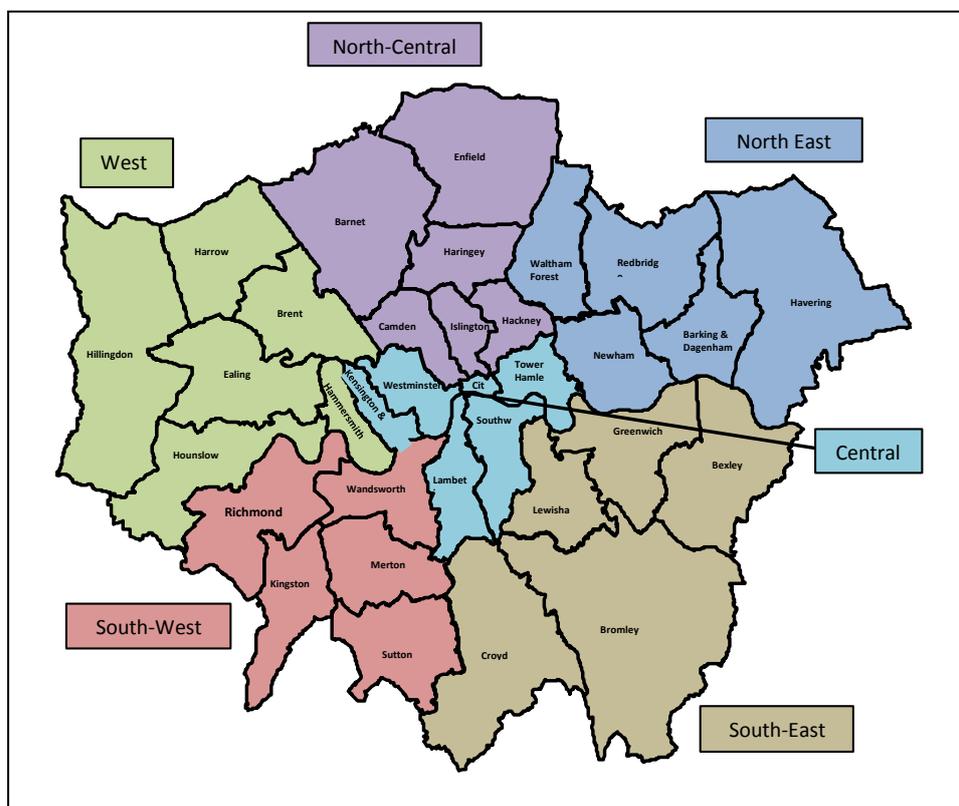
- it supported professional development;
- staff with specific experience or interest had opportunities to be involved; and
- it fostered efficiencies on the basis that the commitment would, over time, be reciprocated by all.

This principle of informal support was used to good effect in planning Exercise Unified Response in 2016 when authorities worked collectively in sub-regional groupings to develop five operational response focused workstreams.

Noting that one staffing model cannot fit all due to differences in local risk profile, priorities and structures, as pressures increase and staffing levels reduce, it is evident that an informal collaborative approach is not sustainable. This is primarily due to local authorities finding it increasingly difficult to commit appropriate levels of staff time and resource. Additionally, the current arrangement does not offer the level of shared efficiencies all authorities should expect.

To support the development of proposals designed to enhance collaboration, see section 3.2.3 Sub-Regional Collaboration, it is suggested that existing emergency planning boundaries offer an ideal basis upon which to initiate change, see Fig 3.8, The sub-regional boundaries have been established for a number of years, strong relationships and shared knowledge already exists between emergency planning teams and a mutual appreciation of local risks, plans and necessary capabilities is more easily achieved.

Fig 3.8:
Sub-Regional
Groupings



3.2.3 Sub-Regional Coordination

Norwell noted: *“the resilience picture across London verges on the convoluted with significant duplication of services and resources across the capital.”* To oversee a coordinated approach to sub-regional collaboration and ensure enhanced resilience, compliance with the full suite of requirements, consistency across London and efficiency is maximised, a number of options have been considered, including:

- a) merging teams and creating sub-regional emergency planning hubs;
- b) developing sub-regional shared service agreements utilising the same principles underpinning the agreement between the London Boroughs of Barking & Dagenham and Waltham Forest;
- c) establishing sub-regional Service Level Agreements; and
- d) enhancing current informal arrangements. This was immediately dismissed due to recognition that an informal approach is unsustainable, see section 3.2.2.

A key factor influencing change is the Civil Contingences Act (2004). With duties applying to individual authorities as Category 1 responders, essential considerations include:

- retention of local sovereignty;
- the ability to understand and manage local risks; and
- the means of delivering fast, high quality professional advice and support in all localities. For this reason, the creation of emergency planning hubs in each sub-region was discounted.

Having considered all the options, it is proposed that a Sub-Regional Lead Local Authority is identified per area, as detailed in Fig 3.8, to co-ordinate local resilience related activities where efficiencies can be obtained and resilience enhanced. In addition the lead authority would also oversee their sub-regional contribution to regional planning and support to the Local Authority Panel. It is suggested that this arrangement is underpinned by an output based Service Level Agreement to offer assurance to chief executives that the spirit of a more equal contribution and benefit is maintained. By adopting this approach it is proposed that sub-regional arrangements can remain flexible to reflect local needs whilst at the same time accommodate any future changes to the local government landscape in London.

Recommendation 4

A Sub-Regional Lead Local Authority should be identified to co-ordinate enhanced collaboration and support a more equal contribution and benefit from sub-regional and regional operational and contingency planning. This arrangement should be underpinned by an output based Service Level Agreement and reviewed against clearly defined success criteria every two years.

The current support provided to the Local Authority Panel by the Implementation Group, which comprises membership from all existing sub-regional groupings, see Fig 3.8, includes practitioner advice, support to London wide implementation of the strategy and policy set and identification of emerging issues and their respective solutions.

A recent decision to move the Local Authority Panel Business Plan onto a three year cycle will enhance the opportunity to pre-plan and coordinate the delivery of local, sub-regional and regional workstreams over an extended period. It is proposed that the role of the

Implementation Group is extended to an enhanced business plan management function and oversight of progress. By adopting this approach, the Implementation Group will be effectively positioned to ensure a balanced allocation of work to sub-regional groups on a three yearly basis. Any issues or concerns identified can be raised immediately with the Local Authority Panel as necessary. This approach also offers an effective means of addressing unplanned, emerging or immediate risks as they arise, in a balanced and coordinated fashion.

Recommendation 5

Local Authority Panel Implementation Group (LAP IG) members should accept a more proactive role in:

- a) managing the three year Local Authority Panel Business Plan and co-ordination of sub-regional activity to ensure a balanced distribution of work;
- b) agreeing with respective peers in each sub-regional group the appropriate means of delivering allocated workstreams in accordance with the Service Level Agreement.

3.3 Duty London Local Authority Gold Arrangements

Principles established in 2004, including the Local Authority Gold Resolution and all chief executives involvement in the Gold Rota, continue to effectively underpin the collective and coordinated approach by all authorities. This combined in practice with their successful application to a far broader range of incidents than first envisaged, has played a fundamental part in increasing awareness amongst partners of the pivotal role local authorities play. Increased public expectation and scrutiny makes it important that these arrangements are further developed to ensure we are even better placed to:

- discharge our community leadership role;
- influence strategic direction and oversee consideration of wider impacts; and
- oversee the seamless transition from response to recovery.

In developing proposals necessary to create more robust arrangements, this review also considered:

- the business case established during Exercise Unified Response, where it was established that chief executives could Chair Strategic Coordination Groups earlier in the response phase than previously envisaged; and
- the following recommendation by Norwell: *“further review the LFB-EP Gold Structure to ensure that on-call arrangements are sufficiently robust.”*

The principle of developing a cadre of Strategic Coordination Group Chairs from across a range of organisations is now actively being pursued. To ensure we effectively support this initiative and establish the means of sustaining commitment it is proposed that this requirement is aligned to membership of the Local Authority Panel. This suggestion is based on the knowledge that Panel members have higher levels of exposure to the London wide resilience agenda.

A further consideration identified by this review and supported by outcomes from Exercise Unified Response is the need to ensure continuity of representation at the strategic level. Although not always possible, it is acknowledged that significant benefit can be obtained by attending Strategic Coordination Groups prior to accepting responsibility, either as the Strategic Coordination Group Chair or London Local Authority Gold.

Recommendation 6

Local Authority Panel (LAP) membership should carry with it the expectation that members will:

- a) be the local authority representatives on a cadre of multi-agency strategic leads available to Chair Strategic Coordination Groups;
- b) undertake multi-agency training to an accredited standard to prepare them to Chair Strategic Coordination Groups;
- c) step in as London Local Authority Gold (LLAG) when necessary to ensure consistency of representation and ease the transition of Chairing the Strategic Coordination Group from the Metropolitan Police Service or other partner agency to local authorities;
- d) where appropriate shadow the Strategic Coordination Group Chair to ease transition prior to accepting responsibility.

Recommendation 7

All chief executives should wherever possible shadow the current LLAG prior to taking over the role during an incident.

This review noted that the current level of support offered to chief executives in advance of Gold duties by London Fire Brigade Emergency Planning comprises:

- introductory and pre-on call briefings; and
- invitations to participate in regional exercises on an ad-hoc basis.

To ensure we are all in the best possible condition to discharge London Local Authority Gold duties and address post incident enquiries and scrutiny with confidence, a more formalised approach to training and exercising is required.

Recommendation 8

All chief executives should attend periodical training events delivered by accredited trainers and participate in a structured exercise programme to prepare them to undertake London Local Authority Gold duties.

3.4 Borough Response Capability

3.4.1 Core Response Function

The number of incidents across London requiring local authority involvement, as reported by emergency planning professionals, is continuing to climb. The increase between April and August 2016, see Fig 3.9 and Fig 3.10, reflects flash flooding events but may also reflect the broadening responsibilities undertaken by emergency planning teams and additional demands placed on them due to pressures on the authority as a whole.

Examples of additional demands made in this time period include:

- dealing with reports of traveller encroachments;
- anti-social behaviour and community safety incidents; and
- environmental health related incidents, such as chemical suicides.

Further research will be required to bottom out the influence these additional incidents have on the overall figures and the impact they have on delivering core emergency planning duties.

Fig 3.9: Emergency Planning Monitoring Report –Total Number of Reported Incidents.

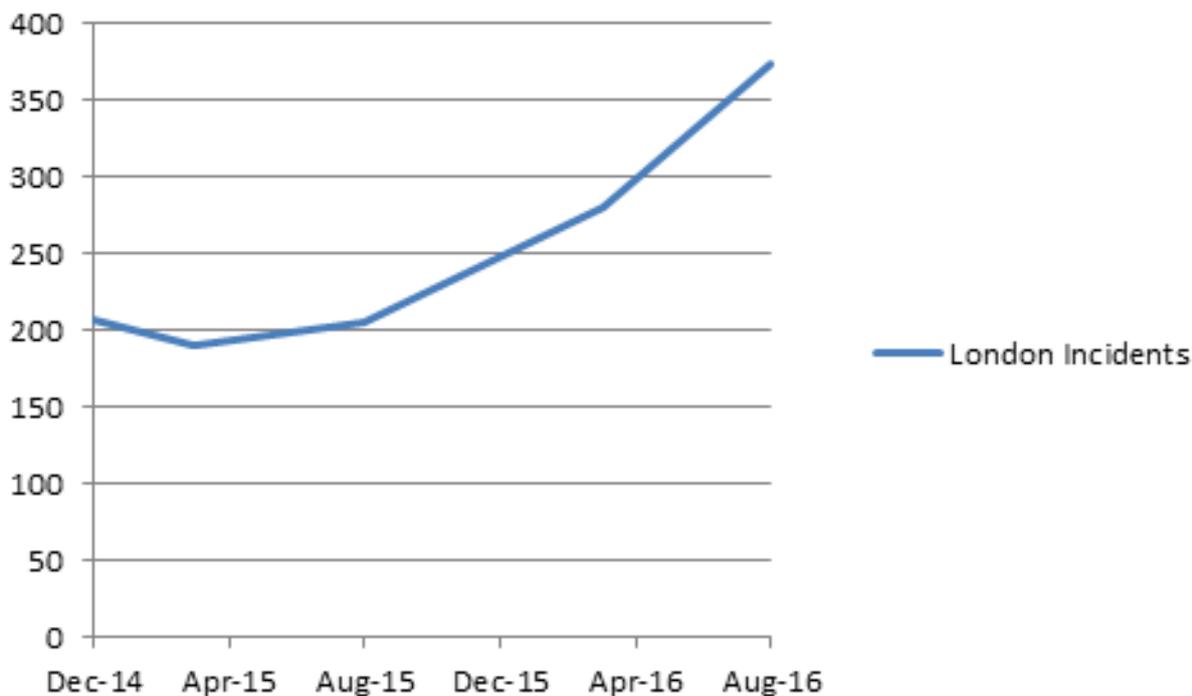
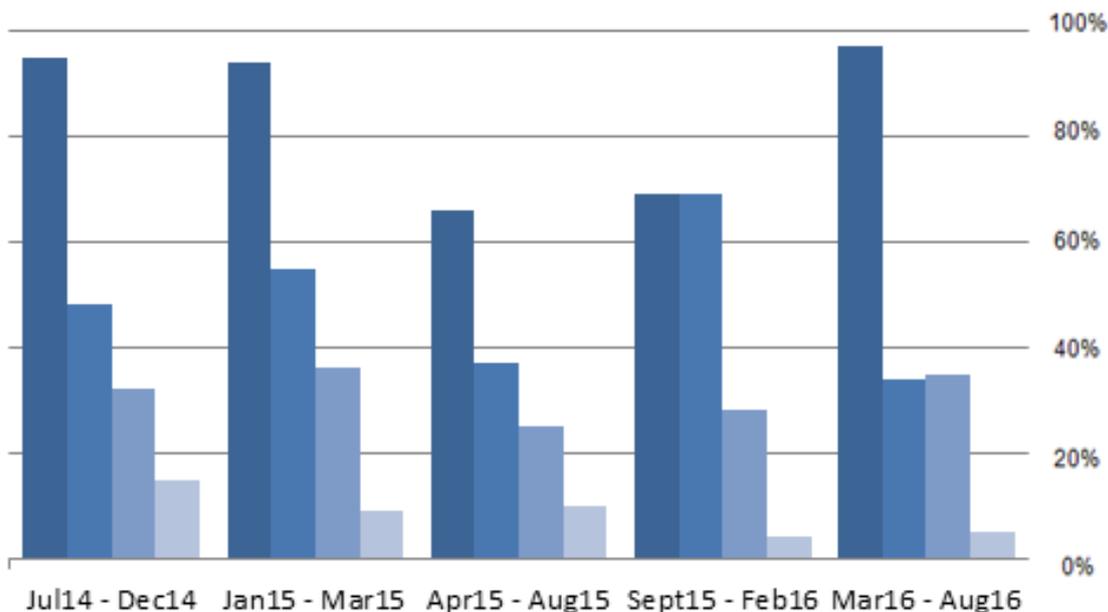


Fig 3.10: Emergency Planning Monitoring Report – Levels of Response to Reported Incidents.

- Emergency Planning Staff
- Local Authority Liaison Officer (LALO)
- Senior Management
- Borough Emergency Control Centre (BECC)



3.4.2 Standardisation of Operational Response Capabilities

Adopting a standardised London wide approach to core operational response functions, such as Borough Emergency Control Centres, Rest Centres and humanitarian assistance, as well as that of emergency planning professionals will enhance resilience. The importance of this is best demonstrated by considering the challenges faced by LB Croydon when dealing with a flood related incident in 2014. Due to the scale and protracted nature of the emergency, staff from a significant number of local authorities demonstrated a willingness to help. This support extended into the deployment of emergency planning professionals. This demonstrated that even a fairly well resourced emergency planning team could need assistance, and that a standardised approach to all parts of Croydon's operational response would have enabled staff from other local authorities to more easily integrate and add value.

Although standardisation will need to be delivered in phases, it is evident that this approach provides the means by which pressures on services can be reduced and a leaner and more agile authority wide operational response model delivered. This would ensure all authorities are able to deliver the level of support our communities need and the assurance chief executives require. It is therefore suggested that all authorities should support this standardisation initiative and benefit from:

- Enhanced resilience;
- Increased efficiency with minimal duplication of effort;
- A greater level of assurance with an established set of standards by which authorities can assess themselves against;
- More effective opportunities for mutual aid; and
- Reassurance to multi agency partners that the level and nature of response will be similar and of a high standard regardless of location.

Recommendation 9

All local authorities should support the standardisation work currently being progressed and adopt consistent protocols and procedures for core response functions when published.

3.4.3 Operational Response Roles

The Emergency Planning Monitoring Report, produced every six months, indicates the overall number of staff trained for Borough Emergency Control Centre and Local Authority Liaison Officer roles has remained fairly static for some time. Rest Centre staffing numbers are, however, on a downward trend. This reduction, can to some extent be explained by the number of authorities who have established agreements with the British Red Cross to carry out elements of this function. Although an acceptable practice, this approach does carry an inherent risk that the capacity of the British Red Cross to support a multiple borough or London wide incident would be tested. Although outside of the scope of this report, it is suggested that further work is needed to assess the level of risk this carries.

This review has identified that as pressures continue, any further loss of corporate knowledge or reductions in staff through outsourcing or other means, could increase levels of risk and affect operational response capabilities. A significant further challenge to maintaining operational effectiveness is the ability of managers to release of staff for training and exercising to ensure competency is established and then maintained.

To address these concerns, it is proposed that we initiate a piece of work to look at:

- opportunities to maximise the workforce available to us;
- the means of aligning 'day jobs' with operational response roles. This approach is complimented by the standardisation work.
- a more focussed approach to recruiting volunteers; and
- the means by which succession planning can be delivered effectively.

Recommendation 10

In order to mitigate any reduction in resource available to support an organisational response, a further piece of work should be initiated to consider the means of:

- a) identifying local authority roles which possess the requisite core competencies to support operational response and recovery functions;
- b) identifying the means by which staff undertaking the roles can be incorporated into operational plans;
- c) ensuring staff are available to undertake the requisite level of training and exercises and are released to undertake response roles during emergencies.

3.5 Assurance

3.5.1 Method and Scope of Assurance

A range of auditing processes are currently applied to the emergency planning service. These range from locally initiated internal audits through to bi-annual national capability surveys conducted by the Cabinet Office. To ensure a baseline standard of resilience planning across local authorities that meets the statutory requirements of the Civil Contingencies Act, Central Government expectations and is commensurate to London's risk profile, the Local Authority Panel adopted full Minimum Standards for London in 2009.

This review has identified that the Minimum Standards for London approach offers the best opportunity to establish a consistent and accurate assessment of capacity and capability across London. To achieve this, however, the process will need to improve. The current process of self and peer assessment has served its purpose but as pressures mount it is suggested that a more robust and independent method should be applied. Norwell noted in his review: *"the recently introduced EP 'Minimum Standards for London' (MSL) have provided a stimulus for local authorities to focus on and raise standards. However, the MSLs rely primarily on goodwill and presume that all local authorities are seeking to improve their resilience arrangements. There is limited oversight of this across London; the consequence is that unsatisfactory resilience performance poses significant reputational risks and would highlight a degree of collegiate failure across London local authorities."*

It is recognised that there remains an expectation that local authorities will contribute to bi-annual National Capability Surveys, satisfy internal auditing needs and ad-hoc requests for assurance. That noted, good work is already underway to increase the categories addressed by the Standards and enhance assessment criteria to allow a consistent approach to internal or external audit, as necessary. Chief executives will no doubt see this as a positive step and one that compliments the direction of this review.

By moving away from a subjective dominated approach and adopting the proposed enhancements to the process, Minimum Standards for London should become the single point of reference for our authorities to assure individual and collective compliance with London specific criteria and overall resilience across the range of our responsibilities.

Recommendation 11

The means by which Minimum Standards for London are formally audited should be agreed by chief executives to offer them the single means by which London local authority emergency planning is accurately assessed.

Recommendation 12

Minimum Standards for London should be realigned to more accurately reflect service requirements:

- a) Immediate Response Capabilities (covering both local and LLAG operations);
- b) Contingency Planning to develop capabilities to deal with acute shocks;
- c) Business Continuity Planning and Corporate Assurance;
- d) Longer Term Resilience Strategies to provide resilience for chronic stresses.

Recommendation 13

All Minimum Standards for London results should continue to be consolidated to offer an annual assessment of capacity and capability and include the means by which urgent concerns can be escalated to chief executives.

3.5.3 Meaningful Assurance

In addition to the changes highlighted in this section, the assurance process should also offer meaningful assessment to confirm that our services are maintaining the appropriate level of resilience and meeting statutory requirements. By adding greater detail to the Standards to reflect baseline levels of operational response capabilities, this will offer the opportunity to assure ourselves that individually and collectively we have the appropriate level of resilience to address the myriad of challenges London now has to confront.

Recommendation 14

Greater detail should be added to Minimum Standards for London pertaining to immediate response capabilities, including clearly defined measurable criteria to offer meaningful assurance such as baseline numbers of trained staff, defined response times and length of operation to be sustained, to define the level of capacity and capability to be maintained by local authorities to address local incidents.

4. Conclusion

Given the heightened challenges that we face and understanding of the pressures on our services, it will be important to move as swiftly as possible to start to put a stronger and more resilient framework in place.

By implementing the steps detailed in this report, capability and capacity will be enhanced, with added strength and depth established locally and regionally. This will ensure all local authorities are in the most resilient condition to efficiently and effectively deliver individual and collective leadership on resilience with confidence, into the 2020's.

Finally, it is understood that the proposals contained in this report will compliment the Lord Harris review but we should anticipate a further short review will be required following the formal release of his findings. This will allow chief executives to be assured that areas additional to those covered by this review or further opportunities to enhance our individual or collective resilience are duly considered.

Annex A: Norwell Review

CELC –24 April, 2015

A review of resilience arrangements in London: interim findings

Background

Following the agreement of CELC on 25 April 2014, John Barradell has been working with the Local Authorities Panel (LAP) on a review to identify proposals for the future of resilience arrangements for London and to ensure the continuing influence of LAP over any such arrangements in order to augment London's capability to respond to resilience incidents.

A number of areas of concern triggered this review, specifically the Mayor's desire to move to closer joint working on resilience with London local authorities, resulting in the shift of day-to-day operational responsibility from the London Resilience Team (LRT) to London Fire and Emergency Planning Authority (LFEPA) as well as co-locating the LRT with the LFB-EP.

In previous discussions by CELC on this issue, it has been noted that: the influence of LAP needs to be maintained and supported by appropriate resourcing of LFB-EP and the LRT; any review of resilience should include an appraisal of risk and resources at a geographical level in order to ensure best-practice provision of services, and; the importance of local authorities pragmatically working together in this area as a matter of principle, rather than merely a means of achieving cost efficiencies.

This review follows a number of historic reviews looking at the scope, structure and resources of resilience arrangements across London and key public sector stakeholders. In 2009, a review assessed the support provided by London Fire Brigade Emergency Planning (LFB-EP), recommending that this should be better shaped to meet the needs of local authorities.

Context

Emergency Planning (EP) teams in London are getting smaller with an ageing demographic. There is an absence of succession and/or career planning within or across local authorities and there are limited opportunities for progression to senior EP positions within local government. The most common form of advancement for EP staff is promotion to roles outside the sector or to similar roles in the private sector.

The location of EP in organisational structures differs across local authorities, ranging from service departments to corporate support functions to the chief executive's office. This divergence can affect the ability of a local authority's EP function to mobilise a large number of operational staff quickly to help to manage an incident. The reporting lines for EP officials are also important – both in terms of withstanding financial pressures and being able to influence decision-making across the organisation.

In the face of highly challenging financial pressures and potentially diminishing resources, local authorities are experiencing an increase in the scale and complexity of resilience demands. There has been a retrenchment of blue-light and other public sector resilience work, often leaving local authorities as the lead or even the exclusive agency in some areas. Business continuity management and procurement processes are also becoming more challenging in the context of more complex supply chains.

It is clear that local authorities should not merely rely on EP teams to manage resilience; instead, an EP team's role should be to ensure that every part of a local authority understands its role and responsibilities in respect of resilience, incident management and business continuity.

Key findings

- The resilience picture across London verges on the convoluted with significant duplication of services and resources across the capital. Even among practitioners, there are diverging views of EP roles and responsibilities, the inter-relationship between the work of different resilience agencies, and general resourcing arrangements across London. There is an acknowledgement from EP managers that the current situation is unsustainable; nonetheless, they are keen and willing to shape the future of resilience structures for London.
- There are significant areas of new and innovative practice within the resilience sector, which may provide an indication of the future direction of EP in London. For example, Waltham Forest and Barking & Dagenham have effectively shared an EP function since 2009. The arrangement is supported by clearly defined service level agreements, with officers dedicated to specific local circumstances across both local authorities. This structure has recently further expanded as schools and public health agencies have purchased EP services from the local authorities under this arrangement.
- LFB-EP's work to manage the LA Gold on-call arrangements and the London Local Authorities Co-ordination Centre (LLACC) is highly valued and well thought of by chief executives and senior managers, though there is significant demand for a more centrally located facility overseen by the LFB-EP. However, there is lack of visibility of some of LFB-EP's work (aside from the LA Gold and LLACC work) and the processes through which the LFB-EP work programme is developed, agreed and monitored.
- The recently introduced EP 'Minimum Standards for London' (MSL) have provided a stimulus for local authorities to focus on and raise standards. However, the MSLs rely primarily on goodwill and presume that all local authorities are seeking to improve their resilience arrangements. There is limited oversight of this across London; the consequence is that unsatisfactory resilience performance poses significant reputational risks and would highlight a degree of collegiate failure across London local authorities.

Initial Recommendations

1. To further review the LFB-EP Gold Structure to ensure that on-call arrangements are sufficiently robust.
2. The City of London Corporation will explore providing a facility to LFB-EP/LRT to meet the demand for a central location for accommodation, situational awareness and information-sharing.
3. To further review an appropriate level of funding for the LFB-EP support to local authorities.
4. To commission research into scoping best-practice arrangements for sharing resilience services across local authority boundaries, including the establishment of a new group of senior officers comprised of Directors and/or Assistant Directors who have strategic responsibility for EP at a local authority level, as well as other key resilience partners.
5. The City of London Corporation will organise a high-level conference for senior managers across London government, including members of the above new group of senior officers, to increase awareness across the full spectrum of local authority functions of EP and resilience best practice.