

# An assurance framework for London Local Government

‘Providing individual and  
collective assurance’

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## Executive Summary

This review was commissioned by the City of London Corporation on behalf of the Local Authorities' Panel in January 2018. The objective of the review is to recommend the means by which London local government, comprising the thirty-two boroughs and the City of London Corporation, can individually and collectively assure their organisations preparedness, particularly their capacity and capability, through a credible, transparent, efficient and cost-effective approach.

To conduct this review, a range of people were interviewed within the London local government family and a number of people outside of London including those in central Government, the NHS, educational establishments and the private sector. A meeting of the London Leaders' Committee was observed during the presentation of the *Riordan/Ney* review and their views have been taken into account in this report. An extensive literature review was conducted of relevant publications and papers to establish the current assurance frameworks and processes in place.

The review would like to thank all those who have participated as they have done so with a very open and honest approach. The access to people and documents and the time afforded to this review is very much appreciated.

The means by which organisations can individually and collectively assure themselves, and others, is fairly limited, which is why this review has set out a broader framework that supports a blended approach to assurance. An assurance framework has many elements to it and aims to embed a culture of organisational self-awareness, learning and preparedness in an environment of openness and transparency. Using one means alone to provide assurance, although important and valuable, can only have limited impact due to the time available for assessment. However, there are recommendations relating specifically to the 'means of assurance'.

It is clear that in relation to assurance, central Government does not have plans, at this time, to put in place any process that imposes, mandates or regulates local authorities in addition to the legislation that currently exists. However, it is currently undertaking work to support local resilience forums. This work includes developing outcome based standards and potentially, an enhanced role in supporting local authorities, through a peer review process, where it is appropriate to do so on a voluntary basis and at the request of the local organisation.

Leaders, portfolio holders and councillors should have a clear role in civil protection, which underpins their community leadership role, that includes setting out the council's statutory duties, responsibilities and expectations for the public and oversight and scrutiny. There should be a public commitment to demonstrate resilience in order to provide critical services during adverse events whilst supporting residents and communities over a prolonged period of time. This review looks in detail at the role for elected Members and makes recommendations accordingly.

The Minimum Standards for London have been a positive tool in creating a set of consistent standards across London enabling councils to develop their capabilities and in providing a degree of assurance. There was overwhelming agreement that it is time to refresh the standards to focus more on outcomes (a qualitative approach) and also to assess capacity (a quantitative approach).

If MSL is the standard by which assurance is to be provided, then the ability to deliver plans and execute capabilities through people, however they are provided, becomes critically important. It will be difficult to offer any level of assurance either at borough level, or collectively across London, if the appropriate level of resource with the appropriate skills and experience is not being provided. These issues were highlighted in EP2020 and in the *Riordan/Ney* review, and were a significant concern during this review. It is not for this review to recommend how the appropriate resource is provided as this is a matter for individual boroughs and the implementation of EP2020.

There was a widespread view that there is limited involvement in Emergency Planning and Resilience (EP & R) across most organisations, with most of the responsibility resting with emergency planning teams and Chief Executives. This review looks at the challenge of embedding a culture of emergency planning and resilience across an organisation in a way that reflects the health and safety culture – it becomes everyone’s business; this approach builds capacity and resilience into the system, ensures responsibility of plans and decision making is at the appropriate level and builds experience and knowledge across an organisation. All of this supports organisational assurance and if replicated across London, leads to collective assurance.

It was not appropriate for this review to design organisational structures however conclusions have been drawn and recommendations made regarding improved engagement and an enhanced role for people and groups across the emergency planning and resilience structure.

Testing, exercising and evaluation is such an important part of the assurance process and given the volume and complexity of incidents occurring across London and the opportunity to exercise across multiple agencies, there is an enormous amount opportunity for organisational learning and for the sharing of information for the benefit of all agencies. Recommendations have been made to this effect.

Recommendations have been made throughout this document and a full list can be found in section 10.

The assurance framework described in this review is complex and will require time to develop and embed across each organisation. The framework will be supported by the means of assurance and through the implementation of the review’s recommendations. The following narrative, within the executive summary, has been written to explain in simple terms, how the framework will work. This narrative can be read in conjunction with the supporting diagram attached as Appendix 7 and should be viewed as an introduction to the detailed information contained within this review.



Underpinning the framework is a recognition that individual assurance is best delivered locally. Establishing appropriate governance arrangements with the correct level of organisational ownership and transparency is imperative to success. If all organisations adopt consistent, robust and transparent assurance approaches, combined with external and independent peer challenge, individual and collective assurance will be more easily achieved and have greater credibility.

Having undertaken research and reviewed the existing assurance processes, it is evident that this complex work will require additional central resource. This will be necessary to address technical issues including the development of revised planning assumptions and detailed criteria to be assessed to confirm capacity, capability and organisational preparedness. Identifying this additional resource will take time. In the mean-time, there are many organisational and regional structures that can be put in to place, adjusted and developed to support the longer-term assurance framework and to enhance a consistent approach across London.

This review identifies initial steps organisations are encouraged to adopt to accurately assess their fitness:

### **Individual Assurance**

- To enhance transparency and credibility Members have a critical role in ensuring emergency planning and resilience is put onto the public facing agendas across Cabinets and scrutiny committees. Members on these groups need to have received the appropriate training and be fully aware of their roles and responsibilities. Additionally, induction processes can be developed to support the new intake of Members following the May elections
- The development of organisational policy frameworks setting out the council's commitments and responsibilities
- Chief Executives and senior managers can support this process by ensuring their staff are fully aware of the importance of the Members role
- Directors should also take a more prominent role within their own organisations in relation to emergency planning and resilience by taking ownership of the business continuity planning process and championing the need for training and exercising
- The local exercise programme should be refreshed, and a system developed to support the evaluation of incidents and exercises; this system should include a facility to identify and share lessons learned. Any learning opportunity should be recorded in an improvement plan and policies and procedures amended where necessary
- The improvement plan should be monitored and discharged through the Chief Executive, Members and Cabinet
- There is an opportunity to review the capacity within each organisation and centrally, to ensure plans and capabilities can be delivered whilst the assurance framework across each organisation is being embedded.

By promoting a culture of 'emergency planning and resilience is everyone's business' which is driven politically and at a senior officer level, it is anticipated that the local assurance will be delivered to Chief Executives.



## **Collective Assurance**

- Alongside the local work, the Local Authorities' Panel should work with London Councils to develop and align a consistent reporting process for the Leaders Committee
- The local authority sub-regional groups should restructure to ensure Directors are now standing members and that the agendas and work programmes reflect the changing roles as set out in recommendation 9
- Close engagement and consultation with central Government and other agencies, through the resilience fora, should take place to ensure any opportunities for collaboration and alignment are exploited. This engagement should include the process for conducting independent external peer review.

By establishing credible peer challenge at the sub-regional grouping level combined with focused external independent peer review, it is expected that consistent and collective assurance will be achieved.

**This review has concluded that if implemented, the broader framework that is set out in this report will provide the individual and collective assurance required across London.**

## Abbreviations

BCP	Business Continuity Plan
BRF	Borough Resilience Forum
CCA	Civil Contingencies Act
CCS	Civil Contingencies Secretariat
CELC	Chief Executives London Committee
CQC	Care Quality Commission
EMT	Executive Management Team
EPC	Emergency Planning College
EP&R	Emergency Planning and Resilience
GLA	Greater London Authority
HMICFRS	Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services
IEM	Integrated Emergency Management
JOL	Joint Online Learning
LAP	Local Authorities' Panel
LAPIG	Local Authorities' Panel Implementation Group
LLAG	London Local Authority Gold
LGA	Local Government Association
LRF	Local Resilience Forum
LESLP	London Emergency Services Liaison Panel
MAGIC	Multi-Agency Gold Incident Command
MSL	Minimum Standards for London
RCS	Resilience Capability Survey
SC	Security Check

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# 1 Introduction

- 1.1 This review was commissioned by the City of London Corporation on behalf of the Local Authorities' Panel in January 2018. The objective of the review is to recommend the means by which London local government, comprising the thirty-two boroughs and the City of London Corporation, can individually and collectively assure their organisations preparedness, particularly their capacity and capability, through a credible, transparent, efficient and cost-effective approach. The full scope of the review can be seen as Appendix 1.
- 1.2 The timescale for the review was agreed as 20 days spanning the two-month period of January and February 2018, therefore, there were inherent limitations to this project including the time available for research and analysis, ability to interview key stakeholders and the time available for comparisons with other quality assurance frameworks in the UK and internationally. It has been highlighted within this report where these limitations have affected the ability to provide more detailed and comprehensive information. Notwithstanding the time factors, a broad range of people, within the London local government family and a number of people and organisations outside of London, were interviewed and evidence gathered. The list of stakeholders interviewed can be seen as Appendix 2.
- 1.3 Following consultation with Mark Sawyer, it was confirmed that this initial review would be officer led. The views of elected members will be critical as this work develops and it was therefore advantageous to have the opportunity to observe a meeting of the Leaders Committee on 6<sup>th</sup> February, where the peer review report, led by Tom Riordan (Chief Executive of Leeds City Council) and Mary Ney was presented. The comments of the Leaders were therefore taken into account when writing this report.
- 1.4 This report complements the reviews and work of others specifically:
  - a. The independent peer challenge (London Local Government's Collective Resilience Arrangements) conducted by Tom Riordan and Mary Ney in December 2017. The recommendations made in that report most relevant to my review are as follows:

***Recommendation 3 – Draw together existing work to develop and implement a clear assurance framework to set expected and consistent standards at borough and regional levels, across all relevant aspects, and provide an annual assurance report to regional and national partners. Utilise peer challenge and improvement partner arrangements to ensure all boroughs operate to a high and consistent standard with the right level of capacity and capability.***

**Recommendation 7** -Develop and agree the role of leaders, directly elected mayors and local councillors in preparedness (including an assurance role through Scrutiny and Audit Committees) and in response and recovery (including a community leadership role rather than a direct operational role). Engage councillors in developing these roles. Leaders and directly elected mayors need to be involved in supporting the role of LLAG, when appropriate, in exercising.

- b. Recommendations for Local Government Emergency Planning and Resilience for the 2020's produced by Mark Sawyer, Local Authorities' Panel Secretariat in October 2016. The most relevant recommendations, from that report to this review, are as follows:

**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.

## 2 Methodology and Literature Review

- 2.1 To conduct this review, a range of people were interviewed within the London local government family and a number of people outside of London. Across a number of London Boroughs, I met with emergency planning specialists, Chief Executives and other senior management staff. I attended and briefed the Local Authorities' Panel Implementation Group, chaired by the Chief Executive of Croydon Council, Jo Negrini and met with the local authority sub-regional leads following this meeting to discuss issues in more detail. I also attended the Local Authorities' Panel to update panel members on the progress to date and the emerging themes, which was followed by discussion and questions.
- 2.2 I attended the local authority Minimum Standards for London Working Group, chaired by Manuela Roedler which included local authority sub-regional practitioners. The entire meeting was dedicated to a discussion regarding this review.
- 2.3 There was a broad range of issues discussed with each person and group with the main themes being:
- Governance and the role of elected Members
  - Public scrutiny and community engagement
  - Roles and responsibilities – Officers, organisations, groups
  - Organisational structures
  - Minimum Standards for London
  - Testing and evaluation including live events and exercising
  - Capacity and capabilities
  - Assurance mechanisms including self-assessment, peer view (internal and external), external validation and the role of audit.
- 2.4 I had the opportunity to attend the Leaders' Committee, held at London Councils, to listen to the presentation of the *Riordan/Ney* Peer Review and the subsequent discussion that followed. This was a helpful opportunity to listen to the views of elected Members particularly around the role of Members in assurance, oversight and scrutiny.
- 2.5 I interviewed a number of people with central government responsibilities including those within the Civil Contingencies Secretariat (Cabinet Office), Emergency Planning College and the Ministry of Housing, Communities and Local Government. This was to ascertain what role, if any, central government has in the assurance mechanism for local authorities and what plans and initiatives were being undertaken which may complement assurance at a local and regional level.



2.6 Again, there was broad range of issues discussed with the main themes being:

- Role of central government in assurance
- Role of the emergency planning college in assurance
- Resilience Capability Survey
- Direction of travel for an 'Emergency Planning and Resilience' Inspectorate
- Accreditation Bodies
- British, European and International Standards
- The relationship between central government, local authorities and local resilience forums

2.7 I met with further organisations and people outside of local and central government including PricewaterhouseCoopers. This was to gain an understanding of the role the private sector could play in assurance and the affordability of this option.

2.8 A full list of the stakeholders interviewed can be seen as Appendix 2.

2.9 An extensive literature review was conducted of relevant publications and papers to establish the current assurance frameworks and processes in place. A list of documents reviewed can be seen in the 'References' section at Appendix 3.

### **3 Findings and Analysis - Civil Contingencies Act 2004**

- 3.1 Following the fuel crisis and the severe flooding in the autumn of 2000 and the outbreak of Foot and Mouth Disease in 2001, the Government announced a review of emergency planning arrangements. The review concluded that existing legislation no longer provided an adequate framework for civil protection and that new legislation was needed.
- 3.2 The Bill received Royal Assent on 18 November 2004 and became known as the Civil Contingencies Act 2004 (CCA). The relatively recent introduction of this legislation is contextually important when considering the framework required to ensure emergency planning and resilience is embedded across organisations. To be effective, emergency planning needs to be embedded within a culture of dispersed leadership and organisational learning to provide the public and other stakeholders with the reassurance that London local government is well placed to, individually and collectively, prepare for, respond to and recover from a major event.
- 3.3 It has taken many years for 'health and safety' to be seen as 'everyone's business' and it is widely recognised there is still more work to be done despite this legislation being introduced in 1974 and the formation of national regulatory bodies such as the Health and Safety Executive. The cultural change, leadership and transparency required to put emergency planning and resilience on the same footing should not be underestimated.
- 3.4 The CCA recognises that local responders are the building block of resilience in the UK, it establishes a clear set of roles and responsibilities for local responders; gives greater structure and consistency to local civil protection activity and establishes a sound basis for performance management at a local level.
- 3.5 Local authorities are designated as Category 1 responders and along with the emergency services, health authorities and national organisations, such as the Environment Agency, are at the core of emergency response. Category 1 responders are subject to the full set of civil protection duties and are required to:
- Assess the risk of emergencies occurring and use this to inform contingency planning
  - Put in place emergency plans
  - Put in place Business Continuity Management arrangements
  - Put in place arrangements to make information available to the public about civil protection matters and maintain arrangements to warn, inform and advise the public in the event of an emergency
  - Share information with other local responders to enhance co-ordination
  - Co-operate with other local responders to enhance co-ordination and efficiency

3.6 An additional duty placed upon local authorities is to:

- Provide advice and assistance to businesses and voluntary organisations about business continuity management.

3.7 Although the CCA is explicit about the statutory duties placed upon local authorities in relation to planning and response activities, information regarding the recovery from an emergency event is contained within non-statutory guidance. The 'Recovery' phase however, is implicit within the act and is an essential element of a local authority's functions.

*The local authority is the agency responsible for planning for the recovery of the community following any major emergency, working closely with other local and regional partners via the resilience forums. (National Recovery Guidance, Cabinet Office, 2013)*

3.8 The recovery phase of an event could take months and years to complete and can place local authorities, as the primary lead, under significant resource, financial and public pressure.

*In contrast, recovery may take months or even years to complete, as it seeks to support affected communities in the reconstruction of the physical infrastructure and restoration of emotional, social and physical well-being. The process of rebuilding, restoring and rehabilitating the community following an emergency or disaster, continues until the disruption has been rectified, demands on services have been returned to normal levels, and the needs of those affected have been met.*

*(Emergency Response and Recovery - Non-statutory guidance accompanying the Civil Contingencies Act 2004. Cabinet Office 2013)*

3.9 The activities required during the recovery phase are very broad and it is therefore essential that local authorities recognise that advanced planning is required as well as the need to test and exercise these plans in conjunction with Resilience Forum partners, neighbouring boroughs and other relevant stakeholders. Capabilities can be built around the four themes shown in Figure 1 below which has been taken from Cabinet Office guidance.

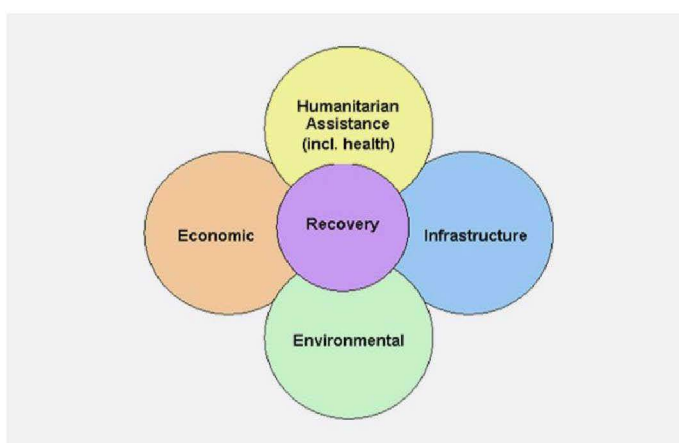


Fig 1. Framework for understanding the impact of emergencies, Cabinet Office 2013



- 3.10 There is comprehensive guidance available to support local authorities in planning for and executing the recovery phase of an emergency including those listed in 'References' at Appendix 3.
- 3.11 Local authorities may have access to funding for the response to major emergencies through the *Bellwin* scheme however, as recognised in the Pitt Review following the floods of 2007 and subsequently re-confirmed by the Cabinet Office, local authorities should make arrangements to bear the costs of recovery in all but the most exceptional circumstances.

*It is up to councils to assess their own risk and put in place the right mix of insurance, self-insurance, and reserves, to provide both security and value for money for their communities. (Cabinet Office 2013)*

- 3.12 This review has found that the statutory duties pertaining to the planning and response to an emergency incident are well understood, documented, assessed and tested. The recovery phase of a civil emergency was discussed in detail with all stakeholders in addition to looking at documents and reports across the boroughs. On more than one occasion 'Recovery' was described as the *Cinderella* of emergency planning with a view this was replicated across the country. There is little evidence to suggest the same level of attention is being paid to the 'Recovery' phase of an emergency incident as it is to preparedness and response, despite this being the lead role of local authorities, the long-term impact this will have on people and businesses in the local community and the potential risk to the credibility and reputation of a local authority.
- 3.13 Recovering from an emergency incident demands the same attention of a local authority as the 'Preparedness' and 'Response' phases do and should be seen as important part of any assurance framework that gives confidence to stakeholders and the public. Therefore Recommendation 1 is as follows:

**Recommendation 1** – Across all Emergency Planning and Resilience activities, the 'Recovery' phase should be given the same priority as the 'Preparedness' and 'Response' phases. This includes activities associated with Governance, planning and setting standards, training, exercising, evaluation and assurance.

## 4 Central Government position

4.1 Central Government does not have a formal role in the assessment or inspection of emergency planning and resilience at a local level, as it does for other sectors, and therefore is not part of the local assurance framework. There isn't currently a framework that mirrors other regulatory bodies such as Ofsted, the Care Quality Commission (CQC) or Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS). Similarly, there isn't a mechanism for accreditation for Emergency Planning and Resilience (EP & R), comparable to that available<sup>1</sup> in the U.S.A. and there are no plans from central Government to create one.

4.2 There are British and International Standards relevant to EP & R although these tend to be process focussed that lend themselves to audit rather than concentrating on outcomes; it is not envisaged that a standard will be developed, at this time or in the foreseeable future, to look at an assurance process or framework.

4.3 This review explored the possibility of Central Government moving towards a more formalised framework such as those highlighted above and as recommended by Lord Harris in his 2016 review:

*Recommendation 69 - DCLG should ring-fence budgets for local resilience teams and introduce a small inspectorate, sitting either within the Cabinet Office or DCLG, to monitor performance. If central government will not introduce such a review mechanism, the London Resilience Forum should consider its role here. (An Independent Review of London's Preparedness to Respond to a Major Terrorist Incident, Lord Toby Harris, October 2016)*

4.4 The position has been clarified by the Civil Contingencies Secretariat (CCS), at the Cabinet Office, that a move to a more regulated or mandated regime is not currently being considered as an option at this time. The emphasis from their perspective is on self-assessment for self-assurance.

4.5 Although there are no plans for a regulatory framework, there are existing and developing tools that could support a local government assurance framework for EP & R. The Resilience Capabilities Survey (RCS) provides information provided by local responders across England and Wales and is used to inform central Government policy and planning. Although the survey is not mandatory and is not used as an assurance tool, it can be used by local responders to compare their own data against that of other responders and, potentially, to support improvement; it will enable a London Borough to compare its own data with all other boroughs across London.

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<sup>1</sup> FEMA (Federal Emergency Management Agency) mission is to support the citizens and first responders to promote that as a nation we work together to build, sustain, and improve our capability to prepare for, protect against, respond to, recover from, and mitigate all hazards.

- 4.6 The RCS is compiled using self-submitted data and therefore any information provided by other organisations should be treated with care and verified if it is going to be used for comparison purposes. As with any self-assessment process, it can only be determined how well an organisation **says** it is performing against how it is actually performing, by looking at the data alone.
- 4.7 The CCS is currently developing a set of standards for Local Resilience Forums (LRF). The CCS believe the standards will enable LRFs, as a collective, to achieve certain outcomes, will inform them of how to get to that standard and will inform them of how they are progressing against the standard. The standards aim to articulate, at the level of individual capabilities, the demonstrable ability to deliver and if an organisation measures up against the standard it will provide a level of assurance that it can perform when required. CCS envisage that by the end of June 2018 a number of standards, setting out the conditions for a successful outcome, will be available for consultation. The standards will be focussed on outcomes and will be for nationwide use.
- 4.8 The standards are likely to be a 2-page brief based on capabilities and formatted as follows:
1. Mandatory minimum standards – what an organisation must do to comply with the law
  2. Normative standards – what an organisation should do and should be able to do
  3. Good practice and leading practice
  4. Series of links to material such as statutory guidance, British Standards, incidences of good practice.
- 4.9 It is clear that central Government do not have plans, at this time, to put in place any process that imposes, mandates or regulates local authorities in addition to the legislation that currently exists. However, given its role in national resilience arrangements and its relationship with local resilience forums, there could be an enhanced role in supporting local authorities where it is appropriate to do so on a voluntary basis and at the request of the local organisation. Two areas to be considered are:

### **Peer Review**

A robust and reliable peer review process is essential to providing assurance. This robustness and reliability would be enhanced if the peer review team was 'matched' by an external organisation or provided through independent means. The independent role of assembling a peer review team, similar to the model adopted by Ofsted, could be one that central Government could take on. If a Government department agreed to take on this role it would be at the request of the receiving authority and any agreement would be entered into voluntarily.



## Training and development

The Emergency Planning College (EPC) is owned by the Cabinet Office and run by SERCO on behalf of them. There are many training providers operating in the emergency planning and resilience arena and it is not within the remit of this review to recommend any one provider above another. Other training establishments able to provide training and support in the EP & R arena include the Fire Service College and the College of Policing who have developed and run the Multi-Agency Gold Incident Command (MAGIC) Course including a 'light' version for local authority Chief Executives. The EPC have been working with organisations such as SOLACE and the Local Government Association to develop training to support senior executives and elected Members in emergency planning.

- 4.10 This review will look at the role training and development has in providing assurance in more detail however, it is clear that providing people with the appropriate skills, knowledge and experiential learning is critical in contributing to the successful conclusion of an emergency incident. Partners will have confidence that individuals and organisations are well placed to prepare for, respond to and recover from a major emergency.

**Recommendation 2** – When developing the assurance framework, close liaison with the Cabinet Office should ascertain their role in supporting assurance across London including 'matching' peer review teams, developing standards and training for elected members and senior officers.

## 5 Governance arrangements and the role of elected Members

- 5.1 *As councillors and community leaders we have an important part to play not just through being involved in responding to and recovering from an emergency, but also through being engaged in the essential planning and preparation needed to ensure resilience and readiness. We have a responsibility to ensure that those charged with supporting our community in the event of an emergency won't get caught out. If the worst happens, we, as elected representatives, are fundamental to ensuring the backing of the public for whatever needs to be done to return to normal. By asking the right questions and ensuring the interests of our constituents are properly represented, we can make a significant contribution to ensuring the overall resilience of our communities. (A Councillors Guide to Civil Emergencies, LGA, 2017)*
- 5.2 The *Riordan/Ney Review* has identified that the role for elected Members needs to be developed and agreed, across London, in preparedness, response and recovery and should include an assurance role through scrutiny and audit committees (*Recommendation 7*). The recommendation was supported by the Leaders' Committee held at London Councils offices on 6<sup>th</sup> February 2018.
- 5.3 This review fully supports that recommendation but would go even further by stating that the role for elected Members is an essential element of any assurance framework and should be considered in the wider context (as it should for all category 1 & 2 responders) of Integrated Emergency Management (IEM), *the concept on which civil protection in the UK is based. IEM is a holistic approach to preventing and managing emergencies that entails six key steps:*
- Anticipation
  - Assessment
  - Prevention
  - Preparation
  - Response
  - Recovery.
- 5.4 This approach will place elected Members at the heart of emergency management from anticipation, sometimes called horizon scanning, aiming to be aware of new hazards and threats which might affect communities, through to recovery, the process of rebuilding, restoring and rehabilitating communities following an emergency. This role, for Members, is not about delivering emergency planning and resilience nor is it about operational decision making, moreover it is about providing political leadership in policy making, oversight, scrutiny and challenge.
- 5.5 The role and responsibilities for elected Members needs to be clearly defined and understood by officers and Members across every organisation. It was apparent through this review that this is not the case in many incidences. It was surprising to hear of the lack of involvement of elected Members in virtually all but a small number of cases and even here, Member involvement has been more recent, within the last 12 months, or has become more prominent following the Grenfell tragedy. In other

cases, although there has been some comprehensive work done with Members it has taken a degree of prompting to reveal this work which leads to the conclusion that Member involvement isn't common practice or proactive.

- 5.6 There was a widespread view that it is sufficient to provide an update or a brief for Members. Members are often seen as having a 'community liaison' role passing information between the council and their community. Clearly, community leadership is an important role for a councillor however, at the very basic level it should be understood that councillors set the strategic direction and agree the policy framework of the council; officers are responsible for delivering the council's policies and for the day-to-day operation of the organisation. There is an important role for Chief Executives and Senior Managers in articulating this narrative and setting the tone for the organisation and this should be put into place as a priority.

**Recommendation 3** - Chief Executives and Senior Managers should champion the role of elected Members across their organisations and clearly articulate that role in a civil emergency including the preparedness, response and recovery phases.

### **Role of the Leaders, directly elected Mayors and Portfolio Holders in Civil Protection and Assurance**

- 5.7 Leaders and portfolio holders should have a clear role in civil protection, which underpins their community leadership role, that includes setting out the council's statutory duties, responsibilities and expectations for the public. There should be a public commitment to demonstrate resilience in order to provide critical services during adverse events whilst supporting residents and communities over a prolonged period of time. This can be done through a policy document signed off by the Leader, Portfolio Holder and Chief Executive. Some have suggested that political Leaders of a council do not have the expertise to sign off and publish an EP & R policy however, this reasoning does not stand up to scrutiny as it is unlikely that political Members will have the expertise for other policy areas either, such as Children's Services or Waste; this is why they employ Officers. The policy should not be a technical document but a set of public commitments and expectations.
- 5.8 Providing the public with information, in broad terms, that enables them to understand what they can expect from the council in the event of an emergency and that provides assurance, is entirely reasonable given the democratic mandate given to elected representatives. It may also be desirable to set out what the council is unable to provide or what limitations it may have. This open and transparent approach enables a dialogue with other Category 1 & 2 responders as well as the public, business community and voluntary sector in order to identify what gaps may exist and who is best placed to step in. This supports the concept of IEM in anticipating new hazards and threats, assessing and understanding the impact, preventing an emergency occurring in the first place by taking appropriate early interventions and preparing for a potential emergency so that everyone understands their role and responsibilities.



**Recommendation 4** – A policy framework should be developed and published, signed off by the Leader or directly elected Mayor, Portfolio Holder and Chief Executive and should set out the Council’s statutory duties, responsibilities and expectations for the public in the event of a civil emergency.

5.9 The roles and responsibilities for senior political leaders should be clearly defined and should include:

- making key policy decisions and considering recommendations from senior officers prior to, during or following a civil emergency
- making representation to central government for additional resources and financial assistance
- promoting joint working with other authorities and stakeholders
- ensuring recovery issues are mainstreamed into normal functions
- minimising reputational risk to the authority and defending decisions
- ensuring lessons are identified, addressed and shared with other appropriate bodies
- discussing with the Chief Executive and senior officers the main risks to communities so key actions can be promoted and supported, which will increase resilience
- support the work of the LRF in planning for emergencies and helping them to be aware of the particular needs of discrete groups and issues within communities
- seek assurance that the borough not only has developed sufficient plans in conjunction with partners on the LRF, but also tests those plans and trains personnel by participating in regular exercises
- encourage all councillors to participate in training and exercises so they are prepared to respond to an emergency and get involved in the recovery from it
- explore with the Chief Executive and senior officers whether contracts with suppliers include clear provisions requiring comprehensive plans for continuing service provision in the event of a civil emergency and for assisting with the response to and recovery from an emergency as appropriate.

#### **Role of the Oversight and Scrutiny Committee**

- 5.10 There is an important scrutiny role for Members within the assurance framework in scrutinising plans, holding officers to account to ensure the borough council is delivering in line with their statutory responsibilities and the expectations set out in the ‘Resilience’ policy. A role for Scrutiny is ensuring lessons identified from exercises and incidents have been incorporated into updated plans and procedures and shared with stakeholders but also that the borough has the appropriate capacity and skills to be able to deliver those plans.
- 5.11 There should be an open and transparent process whereby the public and other interested parties can scrutinise and challenge the work of the committee therefore EP & R should be a standing agenda item in Part 1 of all meetings.



- 5.12 This is not an exhaustive list and further information, including example questions for senior political leaders and scrutiny committees to consider is contained within ‘*A Councillors Guide to Civil Emergencies*’ produced by the LGA in 2016 and is also attached to this report as Appendix 4 and Appendix 5.

### **Training for elected Members**

- 5.13 To support the recommendations in this section, it is essential that elected Members are adequately supported with the appropriate level of training and development. This should give them the relevant skills and confidence to complement the operational work of Officers and should ensure Members are aware of their role and responsibilities, particularly during the response phase when consistent communications and messaging is vitally important. Training should include participation in training events and exercises. This training support should be documented and refreshed at reasonable frequencies, ideally every 12 months.
- 5.14 There is an opportunity this year, following the local elections, to ensure elected Members are introduced to the responsibilities of a London Borough Council across all phases of a civil emergency as well as the public expectations, through the induction programmes. This induction should include the roles and responsibilities for all councillors and set out the specific responsibilities for Leaders, directly elected Mayors, Portfolio holders and Oversight and Scrutiny Committees.

**Recommendation 5** – The role and responsibility for political leaders, including the role of scrutiny, should be clearly defined and supported through induction programmes, training and development and exercises. Consideration should be given to mentoring opportunities to support newly elected or inexperienced Members by those who are more experienced.

### **Role of the Leaders’ Committee**

- 5.15 In line with the endorsement of the Leaders’ Committee on 6<sup>th</sup> February, the Committee should receive an updated report at least annually which provides assurance to Leaders and directly elected Mayors of London Local Government’s collective preparedness, response capability and recovery arrangements.
- 5.16 It is noted that the Leaders Committee have requested an update on the Peer Challenge implementation plan in early 2019. In the interim period, the Local Authorities’ Panel (LAP) should work with London Councils to establish a reporting format in order to report on collective assurance matters that demonstrates continuous improvement through the use of key performance indicators and the testing and evaluation of live events and exercises.

## Further reading

- 5.17 In addition to those documents referenced in Appendices 4 and 5, it may be worthwhile considering a consistent model in the context of emergency planning and resilience during induction or training programmes. The model below is one example which incorporates Nolan's seven principles of public life. There are any number of models available and therefore this review will not make any recommendation that favours any particular one. A larger version of this document is attached as Appendix 6.

To deliver good governance in the public sector, both governing bodies and individuals working for public sector entities must try to achieve their entity's objectives while acting in the public interest at all times, consistent with the requirements of legislation and government policies, avoiding self-interest and, if necessary, overriding a perceived organizational interest. This requires both governing body members and staff in public sector entities to make a firm commitment to the principles in this Framework.

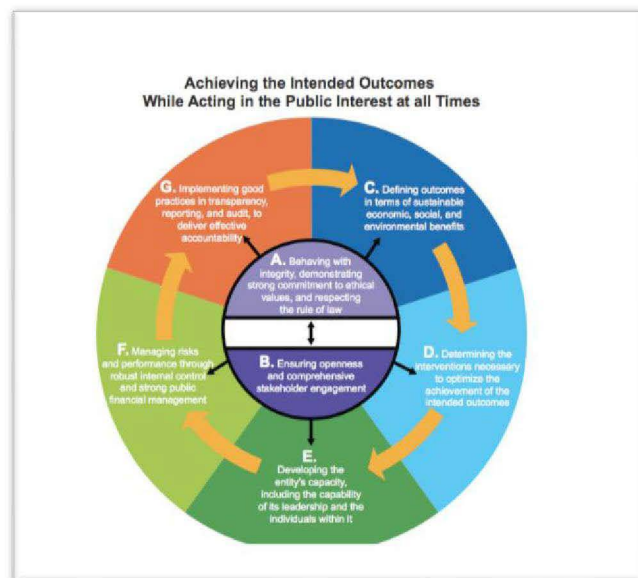


Fig. 2 International Framework: Good Governance in the Public Sector Chartered Institute of Public Finance and Accountancy (CIPFA) and the International Federation of Accountants® (IFAC®), 2014.

## 5.18 Case Studies

### Case study 1 - Ealing Council

The Overview and Scrutiny Committee, at its meeting of 14 April 2016, agreed the establishment of the new Emergency Planning and Business Continuity Scrutiny Review Panel. The membership of the Panel was cross-party including Members from all political groups. Ealing Council is led by the Labour Group; the Chair of the Review panel was a Conservative Councillor and the Vice-Chair was a Labour Councillor. The panel reported to the Overview and Scrutiny Committee.

The panel met five times over the next 12 months and reported its findings in April of 2017. A link to all the papers, including the terms of reference, scope, minutes of meetings and final report are attached in Appendix 3 – References.

#### **The scope of the group was as follows:**

The main purpose of the Scrutiny Panel was to review how well Ealing is organised in relation to a myriad of threats, how it works compared to its neighbours and whether things could be done differently to make further improvements.

The scope of the Scrutiny Panel, was to consider the following key areas relating to the Emergency Planning and Business Continuity in the borough:

- present procedures that are exercised in managing a major emergency
- partnership working on major emergencies
- organisational resilience
- business continuity programme
- IT disaster recovery/IT resilience
- resilient infrastructure
- relocation sites
- corporate risk management and governance (risk management)
- business continuity training
- business continuity promotion
- future of emergency planning

The Panel engaged a broad range of stakeholders in the review to assess existing partnership arrangements, including the Metropolitan Police Service, British Transport Police, London Ambulance Service, London Fire Brigade, Public Health, St Johns Ambulance, Environment Agency and the Greater London Authority.

As well as engaging partners, the panel also sought the views of others including; victims, charitable groups, businesses, education establishments, voluntary and private sectors and residents. As well as the meetings attended, the panel used other methods to gather information including site visits, attending exercises, holding workshops and focus groups and 'mystery shopping'.



The key expected outcomes of the review were as follows:

- to ensure that the Council's emergency planning processes are robust and capable of handling the emergencies within the borough
- to ensure that the Council's business continuity processes are robust enough for the organisation to continue delivery of acceptable service levels after a disruptive period
- to ensure that the Council and the relevant partners are working effectively in handling emergencies within the borough
- to make recommendations for further improvements in the Council's emergency planning and business continuity processes where necessary.

The panel publicised the review and invited expressions of interest from interested people and organisations across the Borough. All meetings were conducted in public and papers were published on the Council's website.

A comprehensive final report was produced (attached in Appendix 3 - References) containing fifteen recommendations. The Overview and Scrutiny Committee will monitor progress and discharge of the recommendations contained within the final report.

## **Case study 2- Brent Council**

Following the fire at Grenfell Tower, a joint task group was formed to assess the council's emergency preparedness. The task group was made up of councillors from its two largest political parties and consisted of a representative from the Audit Advisory Committee and from each of its scrutiny committees:

- Community and Wellbeing Scrutiny Committee
- Housing Scrutiny Committee
- Resources and Public Realm Scrutiny Committee
- Audit Advisory Committee

The task group was primarily looking at internal arrangements for emergency preparedness although it did have access to information from multi-agency meetings. The report contained nine recommendations, a brief action plan with progress updates and was presented to the Audit Advisory Committee and to Full Council.

A summary of the information contained within the recommendations that is relevant to this review includes:

- There is an inadvertent lack of visibility and ownership within the senior management team, as lower level incidents are managed by the Civil Contingencies team in liaison with the Chief Executive directly, therefore on-call rotas should be put in place to formalise the arrangements for incident gold and silver.



- Greater departmental ownership of plans would help deliver greater consistency in understanding of plans and ensure regular review of the practical arrangements laid out with them. Departments should have full accountability for their relevant areas of responsibility.
- There should be induction training for councillors on their role in emergency response and refresher training provided every two years.
- Audit and Advisory Committee to undertake an annual review of emergency preparedness. That internal audit carries out a full review of Emergency Planning and an update should be provided to Full Council in order to enable debate.

## 6 Minimum Standards for London

6.1 *The Minimum Standards for London (MSL) were introduced in 2007, comprising sixteen standards designed to ensure that all local authorities had the appropriate procedures and policies in place to support the London Local Authority Gold (LLAG) arrangements. (Minimum Standards for London Draft 2016.1)*

6.2 Since 2007 there have been a number of developments of MSL to reflect a changing environment and emerging threats, most notably the London Olympics in 2012 and the introduction of audits in 2015 when elements of the standards were revised.

6.3 A further long-term review of the standards was commissioned in 2015 and further detail and recommendations have been provided in the following review:

Recommendations for Local Government Emergency Planning and Resilience for the 2020's (EP2020), *Sawyer 2016*

6.4 The relevant recommendations from EP2020 are as follows;

*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.*

6.5 To complement these recommendations, almost all of those interviewed had a strong view on the MSL and this section will summarise the main points from those discussions culminating in further conclusions and recommendations.

6.6 Many people felt that the MSL was, initially, ahead of its time and provided a strong foundation from which to build and develop a council's capability in responding to an incident. MSL was recognised as a good process in providing consistency across the London boroughs in terms of identifying what plans needed to be in place to meet statutory duties and to support emergency planning practitioners in what they needed

to do to meet the baseline standard. Boroughs are able to demonstrate they have followed a comprehensive process, conducted a self-assessment which is periodically supported by a peer review from another London borough, and which is supported by evidence.

- 6.7 Some felt that setting out defined capabilities was helpful and supported them in their role as well as providing a consistent understanding across boroughs and amongst other partners. A limited number of people commented that MSL enabled them to have a focussed discussion with their Chief Executive about the capability of the borough in the event of an emergency and importantly, for them, to discuss whether the borough had the capacity to deliver the plans.
- 6.8 Although many were positive about the role MSL has played in providing consistency and a benchmark standard across London, the overwhelming view was that the standards need to be refreshed to reflect the current and changing environment and to become more outcome focussed.
- 6.9 There was universal agreement that the current standards are process driven with little emphasis on effectiveness, impact and consequences of not meeting the standard. Many stated that the process of self-assessment was too subjective and a 'tick-box' exercise which often led to a RAG rating of green that may not necessarily reflect an authority's ability to deliver the plan. This point may reflect the 'process' nature of the standards which leads towards a 'green' rating due to a lack of focus on outcome or effectiveness.
- 6.10 The review heard many people describe the current process for assurance, self-assessment and internal peer review, as being akin to *marking you own home work* which is *unsustainable*. Others have stated that the process of self-assessment is too bureaucratic, takes too long to complete and that teams have a lack of capacity to focus the required attention to self-assessment which may lead to skewed results.
- 6.11 There is a view that the standards need to be less prescriptive to reflect the differing risk profiles across boroughs in London. Many people expressed the view that it should be recognised that every borough is different with a different risk profile. It was felt the MSL should recognise risks on the local risk registers and that it is local risks that are the priority for boroughs. It will be difficult to satisfy this point given MSL was developed to deliver minimum standards for resilience across London, although a shift in approach from process to outcome based would assist greatly. Boroughs would understand what outcome they need to achieve rather than how to achieve it.
- 6.12 To support the above point, it should not be necessary for boroughs to submit returns and evidence for risks that are not relevant to them e.g., Pipeline Safety Regulations. However, it would be necessary for boroughs to demonstrate how they can support and contribute to a successful outcome in a neighbouring borough e.g., providing shelter where a neighbouring borough requires assistance.



- 6.13 It will be difficult to offer any level of assurance either at borough level, or collectively across London, if the appropriate level of resource with the appropriate skills and experience is not being provided. These issues were highlighted in EP2020 and in the *Riordan/Ney* review, and were a significant concern during this review. It is not for this review to recommend how the appropriate resource is provided as this is a matter for individual boroughs and the implementation of EP2020. However, if MSL is the standard by which assurance is to be provided, then the ability to deliver plans and execute capabilities through people, however they are provided becomes critically important. The MSL should include some quantitative information to demonstrate how plans and capabilities can be delivered through capacity, ability and skills and importantly, to ensure the support for a civil emergency can be sustained over an extended period of time. In addition to the recommendations set out in EP2020, this review has identified that information should include:
- clear roles identified
  - the number of people trained
  - the number of people exercised
  - the number of people required to respond and sustain an incident over a prolonged period of time
- 6.14 The issues facing local authorities in a civil emergency are not confined to those which are statutory therefore, the refreshed MSL should consider other issues which are important to the public and also important to the credibility and reputation of the local authorities themselves which in turn will provide confidence to the public and other stakeholders. Issues which could be included in any revised standards are community engagement including the voluntary and business sectors, the role of elected Members in Governance and scrutiny and communications.
- 6.15 The content of any standard is important but so too is the language and terminology used and many have said this needs to be simplified, to support a broader engagement, so the standards can be understood by everyone and not just specialists or those that have a good working knowledge of emergency planning and resilience.
- 6.16 The self-assessment process is voluntary although almost all boroughs participate and submit their returns. As previously stated, the assessment looks at a RAG rating against a process rather than an outcome, and if self-assessments are not submitted, or show all green ratings or indeed, all red ratings, it is unclear what the consequences will be. There is no clarity regarding non-conformity or possible sanctions.
- 6.17 The Minimum Standards for London have been a positive tool in creating a set of consistent standards across London enabling councils to develop their capabilities and in providing a degree of assurance. It is acknowledged that it is time to refresh the standards to focus more on outcomes (a qualitative approach) and also to assess capacity (a quantitative approach). It may also be the appropriate time to re-brand the standards to demonstrate a new and refreshed approach which re-builds credibility and confidence in the standards and which aims to 'raise the bar' in terms of continuous improvement. A starting point is an acceptance that every borough



should be compliant with CCA legislation and therefore any refreshed standards should not require the level of detail that is currently documented.

**Recommendation 6** – the Minimum Standards for London should be refreshed and become focussed on outcomes and effectiveness rather than process. The standards should be restructured and have regard to the work being undertaken by the Cabinet Office. The new structure should include qualitative information regarding Governance, including the role of elected Members and scrutiny, community engagement including the voluntary and business sectors, Communications and Public Relations and Training, Exercising and Evaluation. The refreshed standards should also contain quantitative information which demonstrates the capacity to deliver the capabilities. This information should include clear roles identified, the number of people trained, the number of people exercised, the number of people required to respond and sustain an incident over a prolonged period of time. Consideration should be given to how the standards and EP & R more generally, links with other community initiatives such as Prevent, community cohesion and community engagement.

**Recommendation 7** – The Minimum Standards for London should be re-branded and renamed 'Resilience Standards for London'. In conjunction with recommendation 6, which looks at the structure of the standards, the new document should be consulted upon through good engagement with all London Boroughs and their stakeholders. The Category 1 & 2 responders would be a good starting point for this engagement.

## 7 Organisational and Regional Structures

- 7.1 It was evident through the review that emergency planning practitioners are passionate about their role and committed to doing the best job for their borough and the community it serves. Almost without exception, the review found that emergency planning officers are carrying the weight of responsibility for emergency planning and resilience upon their shoulders and there appears to be multiple reasons for this, including:
- Lack of capacity – resources have been reduced across London although in some places boroughs are looking to strengthen their numbers
  - Lack of access – the managerial gap between emergency planning teams and the senior management team, usually the Chief Executive, is too large leading to limited time, visibility and sign off of emergency plans or assessments
  - Lack of confidence – there was a view from some that presenting assessments that included red, or even amber ratings, would not be received favourably and some people felt pressure to achieve green ratings although a green rating may not be a true reflection of reality.
- 7.2 The review has concluded that emergency planning practitioners are feeling intense pressure; there is too much to do and not enough people to do it. For emergency planning teams, capacity is an issue and there is a general feeling that more work is being passed to EP teams when often the responsibility for given tasks lies with other teams. People felt there was an unrealistic expectation on EP teams and that senior managers need to be realistic about what can be achieved.
- 7.3 A further issue relates to succession planning. There are experienced and long-serving practitioners who may be leaving their boroughs over the next couple of years, potentially resulting in the recruitment of inexperienced or developing practitioners unfamiliar with the working environment and high profile of operating in a London Borough.
- 7.4 New people require a clear understanding of their role and responsibilities, have the skills and knowledge that gives them the best chance of success in their new role, be well supported by the organisation in terms of development, mentoring and coaching and have the appropriate level of access for decision making.
- 7.5 Organisational structures should support an integrated emergency management approach with Directors and Heads of Service taking ownership of their own business continuity plans and understanding their role in preparing for, responding to and recovering from a civil emergency. This approach should complement and support the core role of a central emergency planning team.
- 7.6 The gap between emergency planning practitioners and Chief Executives is too large even when the EP team report directly to the Chief Executive. The point is, the people who are engaged in and taking responsibility for emergency management in most organisations are spread too thinly. The Chief Executive will not have the time or

capacity to prioritise EP & R, given the scale and complexity of the challenges they face, whilst the emergency planning practitioners will not have a strategic or holistic view of the issues facing the organisation.

- 7.7 The challenge here is to embed a culture of emergency planning and resilience across the organisation in a way that reflects the health and safety culture – it becomes everyone’s business; this will build capacity and resilience into the system, ensure responsibility of plans and decision making is at the appropriate level and builds experience and knowledge across an organisation. All of this supports organisational assurance and if replicated across London, leads to collective assurance.
- 7.8 The approach set out above is a long-term one and will take time. This requires active engagement and leadership and therefore the people best placed to lead this are the Directors (or equivalent) in an organisation. The visibility of Directors in the EP & R arena will demonstrate corporate strength and ownership and show that senior staff across the organisation are engaged and committed to what is an important corporate issue.
- 7.9 This review found many people, at all levels, felt Directors and Heads of Service need to be more involved to improve access to senior management, inspire confidence and offer the local authority sub-regional groups increased support and influence; people felt strongly that EP & R cannot continue to be the sole responsibility of a small number of people, mainly the EP team.
- 7.10 There was a widespread view that there is limited involvement in EP & R across most organisations including in the most basic activities such as training events and exercises. This review has found that attendance at exercises or training events is voluntary for senior managers and therefore many don’t turn up. In one example 18 Directors were invited to an exercise and 2 turned up. Even after the Grenfell tragedy, it was reported that attendance at training events is poor.
- 7.11 If Directors and other senior managers are not involved, the wider structure within the borough is being missed and it will be difficult to embed a culture of ‘EP & R is everyone’s business’. Involving Directors, and Assistant Directors, including the sharing of learning, updates and training, enables activities such as business continuity planning to be addressed robustly and builds capacity in an organisation allowing business as usual to be managed adequately when an incident occurs.
- 7.12 Business continuity plans and testing those plans is a key part of the assurance process. Business continuity underpins the response and recovery phases of a civil emergency and demonstrates an organisation *can operate normal services in abnormal circumstances*. Senior managers need to satisfy themselves that their own services are well prepared including how prepared are their staff, how much training have they had, how well developed are their plans, are plans tested, exercised and evaluated, are lessons learned and policy and procedures amended as a result, how well do staff understand their EP & R roles in services such as Adults, Children’s, Waste and Housing?



- 7.13 To enable Directors and senior managers to become more engaged and involved in EP & R requires not only Chief Executive direction but also a structured and yet proportionate programme of training and development which includes mentoring and support where required. One borough has begun to progress this work and has begun to withdraw EP teams from incidents to allow Directorates to manage this themselves which in turn creates capacity, gains experience and allows EP teams to get on with their core job.
- 7.14 Finally, organisations need to consider the long-term impact on them during an exceptional incident. This applies regardless whether the incident is on a borough's own patch or if they are supporting a neighbouring borough or leading a work-stream.

**Recommendation 8** – Directors, Head of Service and other senior managers need to be more engaged in EP & R across their organisations and be supported through training and exercising. They need to take ownership and be accountable for business continuity planning in their own Directorates and Services. Senior managers need to satisfy themselves that their own services are well prepared including how prepared are their staff, how much training have they had, how well developed are their plans, are plans tested, exercised and evaluated, are lessons learned and policy and procedures amended as a result.

#### **Local authority sub-regional groups**

- 7.15 The review concluded that the current geographical make of the sub-regional groups is fit for purpose. However, many did question the role and the make-up of these groups including the functions and activities the sub-regions should be responsible for and the people who should attend. The groups should continue to be chaired by a Chief Executive who is well placed to feedback to LAP on behalf the boroughs. In line with previous findings, Directors should take a more active role in EP & R, they are strategic thinkers and have an impact on policy and how the council conducts its business. Therefore Directors, being the decision makers and influencers in an organisation, should attend sub-regional groups to be more accountable and achieve greater buy-in from fellow senior managers in their borough.
- 7.16 There was much discussion concerning the purpose of the sub-regional group. These included:
- shaping strategic improvements including coordinating multi-borough exercises
  - scrutinise and challenge self-assessments, peer reports and judgements
  - providing assurance of performance within the sub-region
  - identify and share lessons
  - discharge action plans including lessons learned
  - be the gatekeeper for repository of information.



**Recommendation 9** – Directors should be members of the local authority sub-regional groups to achieve greater accountability across boroughs and support improved engagement from fellow senior managers in their borough. The role of the sub-regional group should be enhanced to include, coordinating multi-borough exercises, scrutiny of self-assessments and peer reports, providing assurance of performance within the sub-region, identifying and sharing lessons learned and discharging improvement plans.

#### **Further comment**

#### **Communication and engagement teams**

- 7.17 Communication is a key activity in preparedness, response and the recovery phases. It is vitally important in getting up to date, accurate and consistent information to the public, to prevent misinformation and rumour and to protect the reputation of the council. Communication teams need to be on the front foot, particularly in the early stages of an emergency and will, or should have, a broad range of experience in all forms of media including social media.
- 7.18 Communications teams should have a role at the heart of emergency planning and resilience. Teams should be actively building strong networks across their own organisation, with other boroughs' communication teams and with outside organisations such as other Category 1 responders as well as community groups.
- 7.19 The relationship with elected Members is important as it is often the Members who will be the public face of the council during the response phase and the community link during the recovery phase. Communications teams should be involved in training and exercising, particularly where elected Members are involved. Additionally, consideration should be given to how communications teams can support each other during a multi-borough event through pooling or sharing resources.
- 7.20 The relationship between LAP and CELC is important as both need to be at the forefront of the change highlighted above for the framework to be accepted, embedded and then offer the assurance sought after. Communication and good engagement between LAP and the other borough Chief Executives will be critical going forward and needs to be improved.
- 7.21 If more senior managers are to be engaged, including ownership of the assurance framework, they will require the appropriate training, development and vetting. To improve the ability to contribute to multi-agency discussion and decision making and to enhance each organisations credibility in a multi-agency setting, security clearance at SC level should be a minimum and mandatory requirement. This should be in place for Chief Executives and other senior executives engaged in emergency planning work.

- 7.22 Feedback from borough teams, at all levels, indicate that they require the flexibility to decide who undertakes the various response and recovery roles within their organisations, e.g., LALO, and have reported that where people from a more junior level operate in these roles they have been denied access to various meetings or events as they do not hold managerial positions. This could mean those undertaking important roles may be missing important information and networking opportunities. People undertaking these roles need to have the appropriate training, skills and knowledge and have access to meetings and training sessions that affect their role.

## 8 Exercising, Evaluation and sharing information

- 8.1 There is range of exercising taking place across London from large multi-agency exercises to smaller exercises confined to a Service or team in a borough. Exercising is an important part of the assurance framework as it gives organisations the opportunity to test their capabilities whilst giving people the opportunity to learn in a safe environment. It also enables lessons to be identified, learned and shared with other organisations.
- 8.2 This review has found that, although exercises are taking place, attendance from the wider organisation is limited, often leaving the emergency planning teams with the responsibility. Exercises tend to focus on the testing of plans and capabilities through an emergency response exercise with little attention being paid to the recovery phase or the transition from response to recovery. As previously stated, the recovery phase is an important element of a local authority's work and is often extended over a prolonged period of time therefore it should be given a higher priority in all learning environments.
- 8.3 It appears the opportunity to learn from exercises is being missed with a widespread view being, there is little or no evaluation taking place. Even when a live incident occurs, it would appear that although 'hot' debriefs may be happening at the scene, there is no follow-up evaluation or the sharing of information.
- 8.4 It is clear that evaluation is not happening in a widespread or consistent way across the London boroughs. Evaluation is sporadic and is variable from borough to borough. There may be several reasons for this lack of organisational learning but capacity is one reason given and is a common theme throughout this review. Some reported that when efforts are made to evaluate incidents or exercises, the process becomes a bureaucratic form filling exercise with little evidence of information being shared or action plans being put into place and discharged.
- 8.5 Another common complaint was the lack of a process for sharing, including no central repository or database for sharing information. Although many people commented on the lack of a central repository or resource for collating and sharing information, there are at least two mechanisms for doing so. One is the Joint Online Learning (JOL) on Resilience Direct and the other is the London Lessons Review Group.
- 8.6 Given the volume and complexity of incidents occurring across London and the opportunity to exercise across multiple agencies, there appears to be an enormous amount of learning being missed although there are clearly mechanisms to support the sharing of information. Good evaluation requires active participation, effective communication and good coordination. Testing, exercising and evaluation is such an important part of the assurance process that this issue must be addressed as a matter of priority.



8.7 There are a number of suggestions from those interviewed about how the assurance process can be strengthened through better co-ordination and the sharing of information evaluated through exercises or live incidents. In conclusion, these are:

- Ensure departments from across the organisational spectrum are involved in testing, exercising and evaluation. The testing and exercising of business continuity plans can support this
- A single register of lessons learned, with actions staying on the register until implemented or discharged
- Actively encourage and support multi-agency debriefing with 360 feedback from other agencies
- Be aware of each other's capabilities and capacity and introduce a register of assets. This will provide a more co-ordinated and formalised approach for sharing capabilities and experience
- Recognise the importance of learning lessons across London and from outside of London, e.g., Manchester terrorist attack
- Extend the local authority sub-regional groups role to the co-ordination of exercises, sharing information and discharging lessons learned

**Recommendation 10** – Review the current programme for exercising to ensure departments from across the organisational spectrum are involved and decide what exercises, if not all, should require mandatory attendance. All boroughs should ensure they are testing and exercising their business continuity plans. Decide on the most appropriate and accessible forum for sharing lessons identified and communicate this to ensure all relevant people are aware.

## 9 Assurance Framework and ‘Means of Assurance’

### Objective of the review

- 9.1 To recommend the means by which London local government, comprising the thirty-two boroughs and the City of London Corporation, can individually and collectively assure their organisations preparedness, particularly their capacity and capability, through a credible, transparent, efficient and cost-effective approach.
- 9.2 The means by which organisations can individually and collectively assure themselves, and others, is fairly limited and tend to be restricted to those activities highlighted in paragraph 9.4, which is why this review has set out a broader framework that supports a blended approach to assurance. An assurance framework has many elements to it and aims to embed a culture of organisational self-awareness, learning and preparedness in an environment of openness and transparency. Using one means alone to provide assurance, although important and valuable, can only have limited impact due to the time available for assessment.
- 9.3 **This review has concluded that if implemented, this broader framework will provide the individual and collective assurance required across London.**
- 9.4 The review looked at a number of options regarding the means of assurance and much of the detail regarding these have been included in this report. Options explored included:
- a regulatory framework
  - an accreditation body
  - self-assessment
  - internal peer review
  - external validation
  - external peer review
  - independent review

### Regulatory framework

- 9.5 A recommendation from Lord Harris’ review of 2016 recommended the formation of an inspectorate to look at resilience arrangements. This would have provided a judgement from a regulatory body in the same way that Ofsted does for children’s services and education and therefore would offer assurance or recommendations for improvement. Central Government have confirmed that a move to a more regulated or mandated regime is not currently being considered as an option at this time therefore this has been discounted.

## Accreditation body

- 9.6 There isn't currently a mechanism for a body to provide accreditation for Emergency Planning and Resilience (EP & R), comparable to that available<sup>2</sup> in the U.S.A. Central Government have clarified there are no plans to create one at this time. Similarly, it is not envisaged any further work in relation to developing a new British Standard that could support assurance and therefore this has been discounted.

## Self-assessment

- 9.7 Self-assessment is currently used across London boroughs, every other year, to provide a RAG assessment rating against the Minimum Standards for London. The review heard many people describe self-assessment as being akin to '*marking your own home work*' and '*unsustainable*'. Self-assessment can encourage organisations to engage with the assessment criteria, enable them to critically evaluate their own performance and become more self-aware. Any self-assessment that aims to support continuous improvement must be conducted in an open and transparent way and is more helpful where it contributes to a more independent review process.

**Recommendation 11** - Self-assessment should continue to be used incorporating a judgement which is outcome focussed. There should be a willingness to publish the self-assessment and discuss it in a public forum through Member committees. Self-assessment should be used to complement peer review results that includes an improvement plan and a commitment to the public to improve.

## Internal peer review

- 9.8 Peer review is currently used across the London boroughs, within the local authority sub-regional groups. This review has encountered similar comments to that of self-assessment in that the process is not robust or challenging enough and again has been described as '*marking your own homework*'. Once again, a lack of capacity and time has been cited as an issue and there doesn't appear to be a great deal of confidence or credibility associated with the internal review process.
- 9.9 Any process is meaningless if it doesn't get down to the bedrock of how things really are and within that come issues such as culture, leadership and behaviours. Identifying the effectiveness of plans and the capacity to deliver is crucial. This review has concluded that the current system of internal peer review, between emergency planning teams, has limited value and therefore should be revisited.

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<sup>2</sup> FEMA (Federal Emergency Management Agency) mission is to support the citizens and first responders to promote that as a nation we work together to build, sustain, and improve our capability to prepare for, protect against, respond to, recover from, and mitigate all hazards.



9.10 There is a role for the local authority sub-regional groups here, as set out previously and as follows:

- scrutinise and challenge self-assessments, peer reports and judgements
- providing assurance of performance within the sub-region

9.11 Having Directors sitting on the local authority sub-regional groups adds a level of influence, authority and strategic thinking but it should also provide increased confidence in challenging another borough's self-assessments, sense checking independent peer reviews and discharging improvement plans therefore strengthening the assurance process.

**Recommendation 12** - The current process of internal peer review should cease and be replaced by an enhanced role for the local authority sub-regional groups led by people operating at Director level. The role should include the scrutiny and challenge of self-assessments, peer reports and judgements and to provide assurance of performance across the sub-region back to LAP and CELC.

#### **External validation – private sector**

9.12 There are some boroughs that use external validation, from providers such as Deloittes and PricewaterhouseCoopers. This validation normally follows an audit style process against internal policy or standards. To explore this option this review has met with one provider to assess what can be offered from an external perspective. The ability to provide collective assurance was recognised as being very complex and further discussions would be required to scope this work before a specification could be drafted and a cost given, this was not possible in the timescale of this review.

9.13 This type of audit has, to date, been restricted to one borough looking at a specific area of work or a thematic review. The estimated cost for a 5-day audit is estimated to be £15k although this figure would have to be verified, is dependent on the work undertaken and resources allocated to it.

9.14 External validation is helpful and it is for individual boroughs to determine whether it is an option for them. Given the further detail required to establish whether this is a viable option, the potential cost and complexity of providing collective assurance, this option is being discounted for this review.

#### **External and independent peer review**

9.15 There has been unanimous agreement throughout this review that external and independent peer review is the most robust approach in providing assurance, given there will be no regulatory process. Peer review is used extensively in other sectors and it enables an independent panel of people with the knowledge and expertise, to assess the quality of work of other professionals against a set of criteria and levels of performance. The intention of independent peer review is to enhance and improve

the performance of an organisation and to provide assurance to it and its stakeholders.

- 9.16 Peer review is not an inspection, it is a voluntary process and should be seen as a supportive and constructive challenge to help an organisation to improve. Peer review will not, usually, provide a score or a rating but will provide a judgement against a set of standards (Minimum Standards for London) of an organisation's effectiveness in delivering its capabilities (outcomes) and its ability to deliver its priorities (capacity).
- 9.17 Peer review is a cost-effective approach as organisations, across other local government sectors, tend to adopt a reciprocal arrangement; this also encourages the sharing of notable practice and learning. The timing of the peer review is also a matter for the organisation to decide but is usually no more than three years between reviews.
- 9.18 There are two elements to a robust peer review process:
- an honest and accurate self-assessment
  - an independent team of peers with the appropriate knowledge and expertise
- 9.19 An organisation undertaking a peer review process would be encouraged to publish its self-assessment, peer review report and improvement plan.
- 9.20 As previously covered in section 4 a robust and reliable peer review process is essential to providing assurance. The peer review role could be undertaken through a number of means including private sector organisations, metropolitan councils or through a cadre of associates, with experience and knowledge of operating in London, assembled specifically for peer review purposes.
- 9.21 This robustness and reliability would be enhanced if the peer review team was 'matched' by an external organisation or provided through independent means. The independent role of assembling a peer review team, similar to the model adopted by Ofsted, could be one that central Government could take on and they have indicated a willingness to do this at the request of the receiving authority and provided that any agreement would be entered into voluntarily. The Local Government Association (LGA) also have significant experience in organising peer review teams.
- 9.22 Depending on the specific requirements of the review, the number and expertise of people on a peer challenge team can be amended, for example to focus on a specific area in more depth or to bring in expertise from another sector. In the context of this review it is recommended that any peer team includes an elected Member to review the governance arrangements as set out in section 5.
- 9.23 Should the recommendation of independent peer review be accepted it will require a process to be developed with includes a standard to measure against (currently MSL). This process should be developed in conjunction with stakeholders and be subject to

appropriate and proportionate consultation. Previous experience<sup>3</sup> has indicated this could take up to 18-months, although given the specificity of the subject area (EP & R) and the current availability of standards, it is envisaged this could be achieved in under 12-months.

**Recommendation 13** – The means by which London local government, comprising the thirty-two boroughs and the City of London Corporation, can individually and collectively assure their organisations preparedness, particularly their capacity and capability, through a credible, transparent, efficient and cost-effective approach should be independent external peer review. The peer review process should be one element of a broader framework and support a blended approach to assurance. Peer review should also be supported by a self-assessment against the revised and rebranded Resilience Standards for London.

### Interim proposal

9.24 Given the timescale associated with developing a peer review process and for revising the Minimum Standards for London, consideration should be given to putting in place an interim arrangement for developing the assurance framework and for providing assurance. The current contribution from London boroughs into a central fund has recently been increased from £15k to £30k realising an additional £495k. The additional funding could be used, in part, to provide a central resource with the appropriate expertise and experience, to lead on activities which include the following:

- support LAP in developing and embedding the assurance framework
- refresh the standards for London
- assist in the development of the peer review process
- improve engagement and communication
- support the boroughs and local authority sub-regional groups in the developing their enhanced role

9.25 Recruiting the right person and at the appropriate level to have influence is essential. The role requires someone with skills and experience in assurance frameworks, situational and political awareness and excellent communication and engagement skills. Feedback throughout the review suggests someone with experience of emergency response, preferably in London, would be an advantage.

**Recommendation 14** – Implement an interim arrangement for developing the assurance framework and for providing assurance until the framework and peer review process has been developed and embedded.

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<sup>3</sup> The reviewer developed the Operational Assessment process for the UK fire and rescue service on behalf of HMG. This process is now owned and led by the LGA in conjunction with the National Fire Chiefs Council.



## **Collective assurance**

- 9.26 Providing assurance across thirty-three organisations is both complex and difficult. However, there are a number of ways this can be approached and it will be necessary to deploy a range of these.
- 9.27 Embedding the framework, as set out in this review, in each organisation to provide consistency and demonstrate transparency is an important step. This will ensure each organisation is outcome focussed, measuring itself against an up to date set of standards and enabling others to scrutinise and challenge their preparedness and decision making in relation to emergency planning and resilience activities.
- 9.28 The Local Authorities' Panel (LAP), working with London Councils, should establish a standard reporting format in order to report on collective assurance matters to CELC and the Leaders Committee. A standard set of headings should be developed that present evidence of continuous improvement and utilise key performance indicators and lessons identified through the testing and evaluation of live events and exercises. If a similar consistent format could be agreed within each borough, the accumulative results or reports across London could determine a collective view.
- 9.29 Within the framework, exercising and evaluation involving multiple boroughs will provide an opportunity to confirm good practice, identify and share lessons learned and build strong networks with each other and participating agencies. The enhanced local authority sub-regional structure discussed earlier in this report will ensure improvement plans are discharged accordingly.
- 9.30 The external peer review process should include the ability to review across multiple boroughs and may involve reviewing multi-borough arrangements through an exercise. This could take the form of a thematic review that focusses on a specific specialism or area of concern or it could adopt a scenario based approach whereby different specialisms in multiple organisations are reviewed to assess their combined contribution to a successful outcome. This approach could also assess the capacity to deliver and determine whether there is sufficient capacity within the 'system' to support a protracted event involving multiple boroughs whilst maintaining business as usual.
- 9.31 Evidence could be drawn from a number of sources that contribute to a judgment regarding collective assurance. An example would be to take evidence from local resilience forums and government departments that could complement evidence from across the London boroughs and when combined gives a strategic view of preparedness and capability.

**Recommendation 15** - The Local Authorities' Panel (LAP), working with London Councils, should establish a standard reporting format in order to report on collective assurance matters to CELC and the Leaders Committee. A standard set of headings should be developed that present evidence of continuous improvement, utilises key performance indicators and lessons identified through the testing and evaluation of live events and exercises.

## Complementary work

### Levels of assurance

- 9.32 In section 4 the review looked at the role of central government in assurance which included the development of a set of standards for local resilience forums. The Cabinet Office is also developing its approach in assessing departmental capability to inform its policy development in conjunction with the Resilience Capability Survey. Although this is not a method for assuring departments or Ministers, it could provide a holistic view of emergency planning and resilience capabilities across central government, local and regional resilience forums and local authorities.
- 9.33 Evidence from LRFs and government departments could complement evidence from across the London boroughs to support the collective assurance arrangements to Members and the Leaders Committee. The involvement of the LRF and Borough Resilience Forum (BRF) in assurance should be explored further and at the very least these forums should be used to share knowledge, build relationships and networks, test and exercise plans and to give partners an awareness of what the borough council responsibilities are; what they can do and importantly, what they can't do. The BRF could be particularly helpful in engaging and working with the local business community.
- 9.34 Recommendation 70 from the Lord Harris review supports this view:

*Local authorities should work with the London Resilience Forum to consider where effective partnerships might be built at a sub-regional, but supra-borough, level, ensuring that local knowledge and connections can be retained.*

### Case Study

#### NHS England – Assurance Framework

- 9.35 The *Riordan/Ney* review stated there is potential learning from the assurance framework used by NHS England. This review has looked at the framework and discussed it with the regional lead at NHS England (the framework is available to view if required). The assurance process is conducted annually and is based around 57 core standards with additional standards including Governance, Marauding Terrorist Firearms Attacks (MTFA) and Hazardous Materials (HazMat). The standards have been developed over a 5-year period and are still developing therefore it is difficult to

compare the results from previous years. It is envisaged the standards will eventually be locked down to provide a year on year comparison.

9.36 The framework uses a self-assessment process with evidence provided to support it and this is then reviewed by the emergency planning specialists from local or regional offices. This review takes place in a 'support and challenge' meeting and gives specialists the opportunity to challenge judgements. Judgements are broken down as follows:

- Fully compliant
- Substantially compliant
- Partially compliant
- Non-compliant

9.37 The assurance team who conduct these reviews is 12-strong working in three geographical areas across London. The team do have other responsibilities apart from assurance including; developing plans, providing training, organising exercises and events and business continuity planning. The assurance reviews run each year from April to September and consumes most of the team's time during that period. There has been a degree of resistance and challenge over the years regarding the process and the time it takes to complete but it appears the process has now been generally accepted.

9.38 The focus this year will be more on peer review when one service or organisation within the NHS will review the others self-assessment. For example, a major trauma centre will be peer review another centre with the intention of supporting improvement and the sharing of best practice.

9.39 The assurance review is presented to the Local Health Resilience Partnership (multi-disciplinary health partnership) annually with a 6-monthly update on progress; the partnership is officer led. Each organisation is encouraged to publish its results in the spirit of openness and transparency. The framework is a requirement from the Secretary of State through NHS England and the Department of Health therefore, in theory, departments or services not taking part or being judged as non-compliant could face intervention, although this has not happened to date.

#### **Quality assurance model**

9.40 There are hundreds, if not thousands, of quality assurance models in circulation and it is likely that each borough across London will be using differing and possibly, multiple models to support projects and initiatives. However, information and feedback gathered through this review has highlighted a number of areas that require further attention including the management of data and information, the identification and sharing of lessons learned through events and exercises and a recurring theme is the capacity and skills required to deliver capabilities.



9.41 The model in figure 3 is taken from integrated coastal management (ICM) process. The centre, in blue, is based on an adaptive management<sup>4</sup> approach and involves an information cycle, in green, and a capacity building cycle, in red. This model may be helpful in providing a consistent approach across the assurance framework and to focus attention on those areas that have caused significant concern throughout this review. Further detailed explanation may be required to ensure there is a common understanding of each element within the context of EP & R across London.

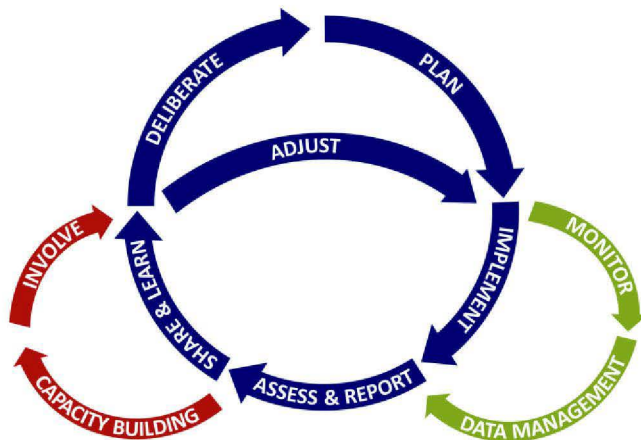


Fig 3. Developing an effective adaptive monitoring network to support integrated coastal management in a multiuser nature reserve, *Vugteveen et al, 2015*

<sup>4</sup> Adaptive management, also known as adaptive resource management (ARM) is a structured, iterative process of robust decision making in the face of uncertainty, with an aim to reducing uncertainty over time via system monitoring.

## 10 List of Recommendations

**Recommendation 1** – Across all Emergency Planning and Resilience activities, the ‘Recovery’ phase should be given the same priority as the ‘Preparedness’ and ‘Response’ phases. This includes activities associated with Governance, planning and setting standards, training, exercising, evaluation and assurance

**Recommendation 2** – When developing the assurance framework, close liaison with the Cabinet Office should ascertain their role in supporting assurance across London including ‘matching’ peer review teams, developing standards and training for elected members and senior officers.

**Recommendation 3** - Chief Executives and Senior Managers should champion the role of elected Members across their organisations and clearly articulate that role in a civil emergency including the preparedness, response and recovery phases.

**Recommendation 4** – A policy framework should be developed and published, signed off by the Leader or directly elected Mayor, Portfolio Holder and Chief Executive and should set out the Council’s statutory duties, responsibilities and expectations for the public in the event of a civil emergency.

**Recommendation 5** – The role and responsibility for political leaders, including the role of scrutiny, should be clearly defined and supported through induction programmes, training and development and exercises. Consideration should be given to mentoring opportunities to support newly elected or inexperienced Members by those who are more experienced.

**Recommendation 6** – the Minimum Standards for London should be refreshed and become focussed on outcomes and effectiveness rather than process. The standards should be restructured and have regard to the work being undertaken by the Cabinet Office. The new structure should include qualitative information regarding Governance, including the role of elected Members and scrutiny, community engagement including the voluntary and business sectors, Communications and Public Relations and Training, Exercising and Evaluation. The refreshed standards should also contain quantitative information which demonstrates the capacity to deliver the capabilities. This information should include clear roles identified, the number of people trained, the number of people exercised, the number of people required to respond and sustain an incident over a prolonged period of time. Consideration should be given to how the standards and EP & R more generally, links with other community initiatives such as Prevent, community cohesion and community engagement.



**Recommendation 7** – The Minimum Standards for London should be re-branded and renamed ‘Resilience Standards for London’. In conjunction with recommendation 6, which looks at the structure of the standards, the new document should be consulted upon through good engagement with all London Boroughs and their stakeholders. The Category 1 & 2 responders would be a good starting point for this engagement.

**Recommendation 8** – Directors, Head of Service and other senior managers need to be more engaged in EP & R across their organisations and be supported through training and exercising. They need to take ownership and be accountable for business continuity planning in their own Directorates and Services. Senior managers need to satisfy themselves that their own services are well prepared including how prepared are their staff, how much training have they had, how well developed are their plans, are plans tested, exercised and evaluated, are lessons learned and policy and procedures amended as a result.

**Recommendation 9** – Directors should be members of the local authority sub-regional groups to achieve greater accountability across boroughs and support improved engagement from fellow senior managers in their borough. The role of the sub-regional group should be enhanced to include, coordinating multi-borough exercises, scrutiny of self-assessments and peer reports, providing assurance of performance within the sub-region, identifying and sharing lessons learned and discharging improvement plans.

**Recommendation 10** – Review the current programme for exercising to ensure departments from across the organisational spectrum are involved and decide what exercises, if not all, should require mandatory attendance. All boroughs should ensure they are testing and exercising their business continuity plans. Decide on the most appropriate and accessible forum for sharing lessons identified and communicate this to ensure all relevant people are aware.

**Recommendation 11** - Self-assessment should continue to be used incorporating a judgement which is outcome focussed. There should be a willingness to publish the self-assessment and discuss it in a public forum through Member committees. Self-assessment should be used to complement peer review results that includes an improvement plan and a commitment to the public to improve.

**Recommendation 12** - The current process of internal peer review should cease and be replaced by an enhanced role for the local authority sub-regional groups led by people operating at Director level. The role should include the scrutiny and challenge of self-assessments, peer reports and judgements and to provide assurance of performance across the sub-region back to LAP and CELC.



**Recommendation 13** – The means by which London local government, comprising the thirty-two boroughs and the City of London Corporation, can individually and collectively assure their organisations preparedness, particularly their capacity and capability, through a credible, transparent, efficient and cost-effective approach should be independent external peer review. The peer review process should be one element of a broader framework and support a blended approach to assurance. Peer review should also be supported by a self-assessment against the revised and rebranded Resilience Standards for London.

**Recommendation 14** – Implement an interim arrangement for developing the assurance framework and for providing assurance until the framework and peer review process has been developed and embedded.

**Recommendation 15** - The Local Authorities Panel (LAP), working with London Councils, should establish a standard reporting format in order to report on collective assurance matters to CELC and the Leaders Committee. A standard set of headings should be developed that present evidence of continuous improvement and utilise key performance indicators and lessons identified through the testing and evaluation of live events and exercises.

### Scope of the review

#### PROJECT OBJECTIVE

To recommend the means by which London local government, comprising the thirty-two boroughs and the City of London Corporation, can individually and collectively assure their organisations preparedness, particularly their capacity and capability, through a credible, transparent, efficient and cost-effective approach.

#### GOVERNANCE

I will report to the Local Authorities' Panel via the Chief Executive of the City of London Corporation, John Barradell. The report including any evidence and reference material gathered and any associated presentations will be available to be scrutinised and challenged by the London local government Chief Executives and is ultimately produced for them.

#### ACCESS

As part of my research in preparing the report I will be required to engage with a number of people and organisations within the London local government family and a number of people and organisations outside of London.

The following list contains examples of people and organisations I may want to engage with:

- London Borough Chief Executives
- City of London Corporation Chief Executive
- Mark Sawyer, London Local Authority Chief Executive Liaison (Resilience)
- London Borough Emergency Planning Officers
- London Resilience Forum
- Borough Resilience forums
- Civil Contingencies Secretariat
- Department for Communities and Local Government
- Higher Education Establishments such as the Emergency Planning College, University College London, University of Coventry, University of Kingston

The above list is not exhaustive and it may be necessary to speak with additional or alternative organisations and specialists, as I deem appropriate.

I may also require timely and reasonable access to information and data, which may not be publicly available such as reports, minutes of meetings, reviews, evaluations and plans. I will liaise with Mark Sawyer to establish appropriate access.

## **LITERATURE REVIEW**

I will conduct a relevant and proportionate literature review to support my conclusions and recommendations and I will document any reference material accordingly.

## **INFORMATION GATHERING**

Reasonable and timely access will be required to people and organisations in the form of interviews, meetings and discussion groups.

## **LIMITATIONS**

There may be people and/or organisations where it is not desirable for me to engage with due to circumstances, which I am currently unaware of. In this case I will liaise with Mark Sawyer, London Local Authority Chief Executive Liaison (Resilience), for clarification before I approach any person or organisation not contained within the list above.

It is not my intention to approach any elected Members.

Any access to people, organisations, data or information, which is denied or is not of my making may cause delay to the delivery of the report or may result in evidence not being included and consequently may affect my conclusions and recommendations.

## **COMPARISON/CASE STUDY**

Where possible I will include a comparison or case study to support my conclusions and recommendations. Given the 20-day duration of this project, this will be completed by undertaking a desktop review and any limitations in drawing conclusions will be documented.

## **REPORT STRUCTURE**

My conclusions and recommendations will be delivered in a report and presented to the Local Authorities' Panel or their representatives as directed by Chief Executive John Barradell.

The report will be broadly structured as follows:

- Executive Summary
- Glossary
- Contents Page
- Introduction and Context
- Aims and Objectives
- Scope of the review
- Governance arrangements
- Literature review
- Methodology
- Findings and analysis
- Conclusions



- Recommendations
- Appendices

#### **DURATION OF THE PROJECT/REVIEW**

20 Days.

#### **START DATE AND END DATE**

The review will start at the beginning of January and end at the end of February.

# Stakeholders interviewed

Gill Steward	Chief Executive, Bexley
John Barradell	Town Clerk, City of London Corporation and Chair of Local Authorities' Panel
Carolyn Downs	Chief Executive, Brent
Mariana Pexton	Chief Officer, Strategy and Improvement Leeds City Council
Gill Mc Manus	Ministry of Housing, Communities and Local Government
Dr Robert McFarlane	Civil Contingencies Secretariat and Emergency Planning College, Cabinet Office
Amelia Coyne	Civil Contingencies Secretariat, Cabinet Office
Johnathan Dowdall	Civil Contingencies Secretariat, Cabinet Office
Andy Wells	Manager Civil Protection Service, Hackney
Peter Ng	Senior Emergency Planning Officer, Hackney
Kelly Jack	Resilience Manager, Croydon
Hari Waterfield	Emergency Planning Officer, Croydon
Malcolm Davies	Head of Risk and Corporate programme Office, Croydon
Sara Sutton	Director of Public Protection and Licensing, Westminster
Mick Smith	Head of Community Safety, Westminster
Andrew Pritchard	Consultant, Kensington and Chelsea
Barry Quirk	Chief Executive, Royal Borough of Kensington and Chelsea
John Hetherington	Deputy Head of Local Resilience Group
Manuela Roedler	Local Resilience Group
Mark Sawyer	City of London Corporation
Gary Locker	Head of Resilience, City of London Corporation
Paul Najsarek	Chief Executive, Ealing Borough Council
Alan Jones	PricewaterhouseCoopers
Major General Roger Lane	Roger Lane Consultancy
Commissioner Dany Cotton	London Fire Brigade
Deputy Commissioner Steve Apter	London Fire Brigade
Kim Dero	Chief Executive, Hammersmith and Fulham
Matthew Sullivan	Visiting Lecturer, Kingston University
Peter Boorman	Regional Lead for Emergency Preparedness, Resilience and Response, NHS England
Stuart Brown Lawrence Luscombe Charley Newnham Paul Robertson	PricewaterhouseCoopers

Martin Funnell MBE	Deputy Head of Resilience and Emergencies Team, West Sussex County Council
Mike Price	Mike Price Consultancy Limited (Standardisation project)
Local Authorities' Panel – 7 <sup>th</sup> February 2018	
Local Authorities' Panel Implementation Group – 24 <sup>th</sup> January 2017	
Minimum Standards for London Working Group – 29 <sup>th</sup> January 2017	
Observed Leaders Committee – 6 <sup>th</sup> February 2017	



### References

- 05/07/2016 [Ealing Borough Council - Emergency Planning Review Panel, 1st meeting](#)
- 22/09/2016 [Ealing Borough Council - Emergency Planning Review Panel, 2nd meeting](#)
- 06/12/2016 [Ealing Borough Council - Emergency Planning Review Panel, 3rd meeting](#)
- 02/02/2017 [Ealing Borough Council - Emergency Planning Review Panel, 4th meeting](#)
- 11/04/2017 [Ealing Borough Council - Emergency Planning Review Panel, Final meeting](#)

London Local Government's Collective Resilience Arrangements, Independent Peer Challenge. *Riordan and Ney, 2018*

Leaders Committee Papers. *London Councils, Feb 2018.*

Emergency Preparedness, A Task Group Report. *Brent Council, 2018*

A Councillors Guide to Civil Emergencies. *Local Government Association, 2017*

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MSL Assessment 2017 - Evidence Report. *London Resilience, 2017*

Recommendations for Local Government Emergency Planning and Resilience for the 2020's (EP2020). *Sawyer, 2016*

Minimum Standards for London Draft 2016.1. *London Resilience, 2016*

An Independent Review of London's Preparedness to Respond to a Major Terrorist Incident. *Lord Toby Harris, October 2016*

MSL Administrative Update and assessment Process Review. *London Resilience, 2015*

LESLP Major Incident Procedure Manual Version 9.4. *LESLP, 2015*

Developing an effective adaptive monitoring network to support integrated coastal management in a multiuser nature reserve. *Vugteveen, Pim, Katwijk, Marieke, Rouwette, Etiënn, Lenders, H, Hanssen, Lucien, 2015*

Guidance on Organisational Resilience BS65000:2014. *The British Standards Institute, 2014*

International Framework: Good Governance in the Public Sector. *Chartered Institute of Public Finance and Accountancy (CIPFA) and the International Federation of Accountants® (IFAC®), 2014*

Expectations and Indicators of Good Practice Set for Category 1 and 2 Responders. *Cabinet Office 2013*

Emergency Response and Recovery - Non-statutory guidance accompanying the Civil Contingencies Act 2004. *Cabinet Office, 2013*

National Recovery Guidance. *Cabinet Office, 2013*

Pitt review: Learning Lessons from the 2007 floods, An Independent Review by Sir Michael Pitt, 2008

### Example questions for leaders and portfolio holders consider

How engaged is the council in the LRF?

Are there sufficient officers at each level appropriately trained to participate in multi- agency coordinating groups?

Are all senior staff aware of what the council roles and responsibilities are in local resilience forum multi-agency emergency plans and is the council ready to deliver them?

Have arrangements been made to enable close working with other councils within the LRF in the event of an emergency (e.g. information sharing, shared communications plan, joint spokespeople, etc.)?

Does the LRF have an up-to-date risk register and does it fully reflect risks faced by the council and incorporate climate change risks? Is it sufficiently detailed and comprehensive, written in plain English and understandable to the general public? Is it readily available to the public?

Are there sufficient plans for preventing emergencies; and reducing, controlling or mitigating the effects of emergencies in both the response and recovery phases?

Do the emergency plans fully reflect the identified risks?

Do plans clearly identify vulnerable groups or businesses that are at particular risk?

When were business continuity plans last checked, updated and tested?

Is there a good risk management strategy in place with adequate systems and resources to implement it?

Is there sufficient up-to-date information on the website to enable residents to contact the council in an emergency during a normal working day and out of hours and does the website make clear to residents what they can expect from the council in a local civil emergency?

When was the website last updated? Is it fully up-to-date and does it fully reflect current arrangements and points of contact?

Does the council have arrangements to generate the resource to respond to calls from residents about short or no notice emergencies out of working hours, particularly during the holidays, e.g. over Christmas and the New Year?

Are senior members of staff suitably trained in the implementation of the LRF's emergency plans and ready to respond in the event of an emergency?



Are emergency contact numbers for all key personnel, including councillors, available and up-to-date?

Are councillors aware of their role in responding to an emergency and have they had a recent up-to-date communications brief on emergencies to enable them to fulfil their community leadership role and be well informed for any media contact?

Are up-to-date and fit for purpose emergency and business continuity plans in place and are they coherent with local resilience forum plans?

Have lessons learnt from previous emergencies across the country been identified and plans modified accordingly?

### Example questions for scrutiny committees to consider

How well is the council cooperating with other key organisations like the Environment Agency and the emergency services?

Have risks to council buildings and facilities (e.g. schools, leisure centres, libraries, residential care homes, day centres, etc.) been properly identified and are mitigations and fall back plans in place?

Is the council conducting active horizon scanning for new risks and working with the LRF to regularly update the risk register?

Is the risk register sufficiently detailed and comprehensive, written in plain English and easily understandable by the general public?

Is the council aware of the impact emergencies could have on local businesses and the local economy and does it have plans to mitigate the impact?

Does the council have the wherewithal to be able to give advice to the commercial and voluntary sectors in the event of an emergency?

Do plans include measures for preventing emergencies and for mitigating the impact of emergencies when they arise?

Do plans reflect lessons learnt from previous emergencies across the country?

Have climate risks and opportunities been built into local growth plans?

Has training been provided to councillors and has training offered been taken up?

What assurance is there that the council has developed and practiced appropriate emergency and business continuity plans and are they coherent with the local resilience forum plans?

When were the council's business continuity plans last tested and how frequently are such tests planned to be carried out?

When was the last time the council participated in an exercise and when is the next exercise planned?

When were response arrangements last reviewed to ensure that newly elected members and staff are fully briefed?

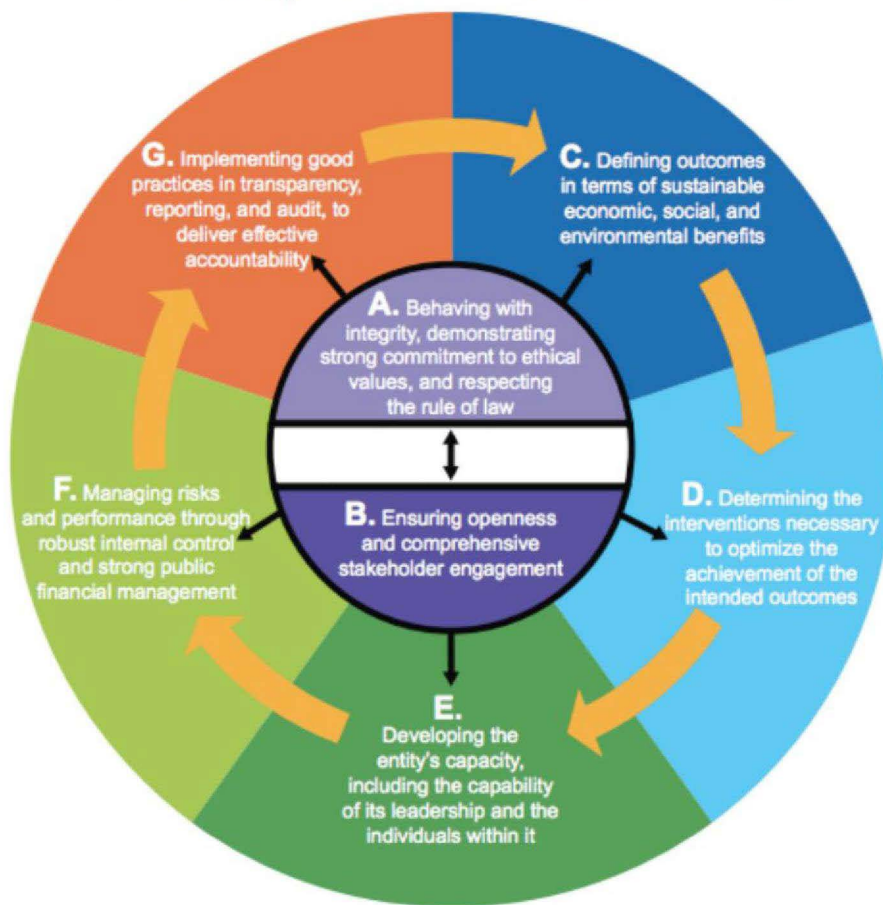
What arrangements does the council have for scaling up the staff resource to not only support the response, but also maintain the delivery of front line services?

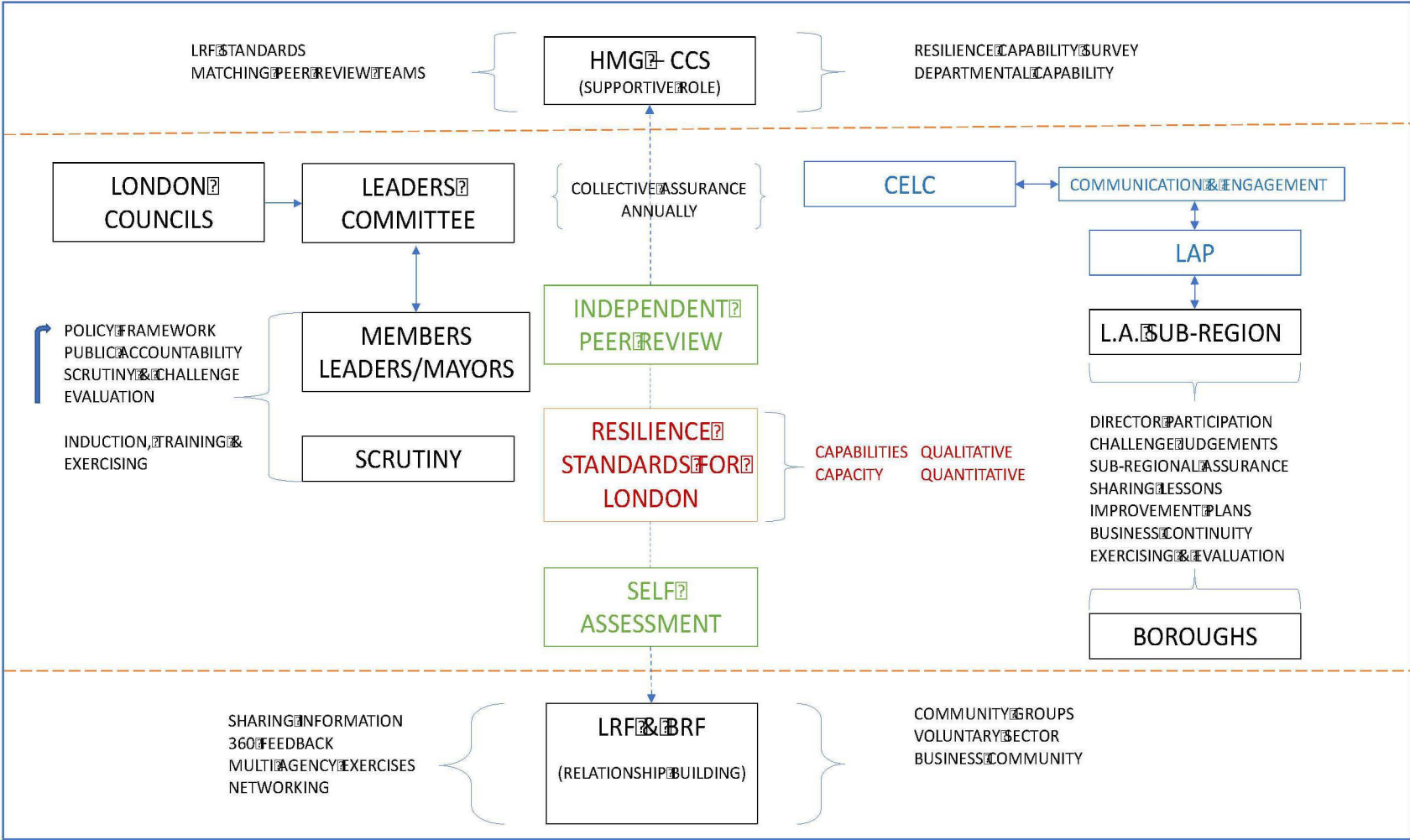
Which officers have been appropriately trained to participate in coordination groups and is this sufficient to ensure that the council can participate fully in responding to and recovering from emergencies?



Figure 1: Relationships between the Principles for Good Governance in the Public Sector

**Achieving the Intended Outcomes  
While Acting in the Public Interest at all Times**





### Biography – Sean Ruth QFSM

Sean is a senior leader with significant experience in County Council, Central Government and fire and rescue environments having operated at senior executive level including Chief Executive, Deputy Chief Executive and Executive Director of a large county council.

Up until June 2017 Sean was the Deputy Chief Executive in a large County Council operating with a £500m budget. Sean was part of the Executive Leadership team that delivered significant change, transformed services and delivered in excess of £200m savings.

Sean was one of three Executive Directors on the Executive Leadership team and led the Communities and Public Protection Directorate; he brought together a range of services including fire and rescue, resilience and emergency planning, business continuity, Libraries, Coroner's Office, a small public health team, trading standards, strategic partnerships and a number of community teams engaged in community development, engagement and co-production. Sean has national experience of quality assurance having led on the design and implementation of the Operational Assessment toolkit for the UK Fire and Rescue Service during a 2-year secondment to the Department for Communities and Local Government; he was a senior advisor to Ministers and civil servants on fire and rescue policy. He has also worked extensively with the Audit Commission and the Health and Safety Executive.

Sean was a strategic advisor to the National Joint Council (fire and rescue) from 2013 to 2017.

Alongside his corporate role Sean was the Chief Fire Officer for West Sussex Fire and Rescue Service from 2013 delivering a transformational change programme which included reducing the operating budget by 25%, reducing the establishment figure by 22%. Despite these significant reductions, the fire and rescue service has continued to see improved performance across a range of indicators through well-researched and robust evidence-based plans, matching resources to community risk and strong stakeholder engagement.