LONDON FIRE BRIGADE

Agenda item: 2.4

Report title

Operational risk information: LFB response to national operational guidance

Meeting	Date
Corporate Management Board	27 February 2013
Report by	**Document number**
Head of Strategy & Performance	043/13

Summary

DCLG issued operational guidance on 'operational risk information' in April 2012. This paper considers the content of that guidance and the extent to which LFB is compliant with the guidance. An earlier version of this report was considered by the Operational Directorates Coordination Board (ODCB) on 4 December 2012. The report also recommends piloting a version of the 'Strathclyde' building information plate with a London borough housing provider, as another means of providing information to assist crews at the incident scene.

For decision

1) CMB is asked to note Brigade compliance with the national guidance on operational risk information.

2) CMB is asked to agree the following actions (and leads):

	Action	*Lead (plus other HoS involved)*
a)	Work with the Joint Emergency Services Interoperability Programme (JESIP) to ensure that work is progressed nationally to establish standards for the sharing of information/data between brigades and between category 1 and 2 responders. [pages 7, 11, 17]	**Head of Operational Resilience**
b)	Continue with short-term tactical work to share operational risk information with neighbouring brigades and emergency services in London. [pages 7, 8]	**Head of Strategy and Performance** with Head of Operational Resilience
c)	Consider again whether there would be merit in incorporation of relevant fire safety regulation data in the ORD, and the extent to which there are benefits of information gathering direct from a 'responsible person' and/or others. [pages 10,12, 14]	**Head of Strategy and Performance** with the Head of Fire Safety Regulation

	Action	*Lead (plus other HoS involved)*
d)	Consider adding community, heritage and economic impact as planning considerations to the information gathering protocols and (where appropriate) to Policy 800 and the risk matrix.[page 13]	**Head of Operations, Prevention and Response** with the Head of Operational Resilience/ Head of Strategy & Performance
e)	Progress arrangements to link the ORD with other key systems, where necessary, including improvements to the interface with Station Diary. [pages 8, 12]	**Head of Strategy and Performance** with other relevant heads of service
f)	Consider whether the set of common map symbols, developed by the Cabinet Office with Ordnance Survey, to promote interoperability between emergency responders, should be adopted and implemented in the Brigade. [page 11]	**Head of Operational Resilience** with Head of Strategy and Performance.
g)	Agree that an operational assurance audit/review take place to identify the consistency with which stations identify sites/buildings that might present an operational risk or hazard, and compliance with Policy 800 (and the risk matrix). The audit/review to take place after new section 7(2)d training has been put in place and is delivered. [page 14]	**Head of Operations, Prevention and Response** with Head of Operational Assurance
h)	A pilot project be initiated to work with local housing providers in some London boroughs to install the 'Strathclyde' style building information plate. [pages 17-19]	**Head of Operations, Prevention and Response** with Head of Operational Assurance

Strategic and handling issues

The inquest into fire at Lakanal commenced during the preparation of this report. During preparatory work for the inquest and from dealing with issues arising from the inquest, a number of issues related to incident pre-planning, and the capture and use of operational risk information have arisen. This report does not attempt to deal with these issues, nor to predict whether there will be any recommendations arising from inquest which might impact on the Brigade. The outcomes from the inquest will clearly considered in some detail when they are available.

Matters still for resolution by CMB

None.

Head of Legal and Democratic Services comments

The proposals set out in this report are consistent with the Authority's obligations under health and safety and fire and rescue services legislation. While the subject of the report includes compliance with guidance, and therefore no legal obligation to follow it, any departure from the guidance needs to be carefully risk assessed as justifiable in the circumstances.

Director of Finance and Contractual Services comments

The Director of Finance and Contractual Services has reviewed this report and has no comments.

Consultation

Name / Role	Method consulted
Head of Operations, Prevention and Response (comments from Dave Brown, John Elwell, Richard Binder) Head of Operational Procedures Head of Operational Resilience (comments from Tim Cutbill, Martyn Wilson), Head of Operational Assurance (comments from Graham Ellis, David Lindridge) Head of Strategy and Performance (comments from Lee Drawbridge, Clive Eustice, Anna Lockwood), MDT Governance Board representatives (comments from those above)	ODCB meeting on 4 December 2012. By email on ODCB version of report and CMB version.

Introduction

1. This report explains the national operational guidance on *'operational risk information'* which was issued by the Department for Communities and Local Government (DCLG)/Chief Fire and Rescue Adviser's Unit (CFRAU) in April 2012. It is clearly necessary to review this national guidance and consider whether or not the Brigade's existing arrangements need to be amended in line with national guidance. It is clear that the responsibility for application of the guidance lies with each FRS and it is for each FRS to decide whether to adopt and follow the guidance in part or in full. A copy of the guidance can be found on the DCLG web site here. An earlier version of this report was considered by the Operational Directorates Coordination Board (ODCB) on 4 December 2012.

2. This report examines the contents and requirements of operational guidance document *Operational Risk Information* against LFB arrangements. It considers the extent to which the Brigade is already compliant with the guidance, or has in place equivalent arrangements, and the extent to which further work is required. The report seeks to identify any significant differences between the guidance and LFB arrangements, and highlights any LFB policy gaps or shortcomings in order to highlight any opportunities for improvement. This report makes a number of recommendations which will provide organisational assurance that LFB arrangements are in line with national guidance in this area.

Background

3. In October 2010, the Health and Safety Executive (HSE) issued *'Management of Health and Safety in the GB Fire and Rescue Service'* in response to a number of high profile accidents and inquests. The report consolidated and summarised findings from investigations within eight Fire and Rescue Services. CMB considered the report in April 2011 and the extract concerning operational risk information is in appendix A.

4. Within section 3.4 of the report *'Provision of Risk Critical Information'* there was a recommendation for the production of national guidance for the classification of risk premises and the provision of risk information. The section refers specifically to risk critical information and the need for it to be accurate, timely and suitable.

5. As a result of the HSE report, the CFRAU commissioned Fire and Risk Management Support Services Ltd (a company chaired by ex CFO(Buckinghamshire) Damian Smith) to develop the guidance. A consultation process took place before the guidance was issued. Guidance was issued by CFRAU in March 2012 as fire and rescue service operational guidance - *Operational Risk Information*. LFB is acknowledged within the document for their assistance in providing regional briefings.

6. In his speech to the CFOA conference on 20 September 2012, the Fire Minister, Brandon Lewis, specifically mentioned the need for FRSs to engage in multi agency planning to strengthen the ability to respond and recover from disruptive events. The Fire Minister also made reference to the new National Framework requirement to identify and assess the full range of foreseeable FRS related risks.

LFB policies relating to operational risk information

7. The Brigade's Operational Risk Database (ORD) replaced the Central Risk Register (CRR) in April 2011 and is the main database which holds location-based operational risk information. The ORD links to the premises/sites detailed in the outside duties visit schedule in the Station Diary and particularly, the details of premises that station personnel visit on a regular basis. Appropriate information and a tactical plan (when required) is added to the ORD by station personnel via Station Diary. In addition, the ORD also holds information derived from centrally managed datasets (some obtained externally). All the information held in the ORD is made available to crews via icons on maps displayed on appliance Mobile Data Terminals (MDTs) and can also be accessed by the subsequent incident commanders through the systems available on the Command Units. See appendix B which explains the purpose of the ORD. In addition, ORD information is also available using an address search via a desktop application for any LFB user.

8. A number of LFB policies deal with operational risk information, the MDTs or the ORD as follows:

   - **Policy 665** – Digital main scheme radio (includes information on how to use the MDT)
   - **Policy 748** – Mobile data terminals (MDTs) (includes the use of MDTs to access information).
   - **Policy 800** – Information gathering / contingency plans. This is the main policy relating to the collection of operational risk information, including the risk matrix.

9. Two other policies specifically deal with incident ground decision making and the use of information, although neither currently explicitly mention the operational risk information available from the ORD, nor use of the MDTs to access information en-route to and at the incident. These policies are:

   - **Policy 341** – Decision making model.
   - **Policy 342** – Dynamic risk assessment.
   - **Policy 541** – Command Support at incidents
   - **Policy 722** – Command Support System

What the national guidance says

10. The purpose of the guidance is explained as *"...robust yet flexible guidance on developing and maintaining a consistent approach to managing, processing and using strategic and tactical operational risk information that can be adapted to the nature, scale and requirements of the individual Fire and Rescue Service."* And *"... to provide consistency of approach that forms the basis for common operational practices, supporting interoperability between Fire & Rescue Services and other emergency responders ... to support safe systems of work ... and enhance national resilience."*

11. As with all national guidance, the document says *"It is a matter for each individual Fire and Rescue Service whether to adopt and follow this operational guidance. The onus of responsibility for application of guidance lies with the user."* The document says that it is anticipated that the guidance will promote common principles, practices and procedures that will support national resilience and interoperability and enable the Fire and Rescue Service and other emergency responders to resolve operational incidents safely and efficiently.

12. The key points from each section of the guidance are set out below, together with a commentary on the equivalent LFB position. (note: section 1 (preface) and section 2 (foreword) make no substantive points)-.

Section 3 – Introduction

13. Emphasis is placed on section 7(2)d of the Fire and Rescue Services Act 2004 to make arrangements for obtaining information needed for its purposes. The document stresses that the national framework places a requirement on all FRAs to have in place effective arrangements for gathering risk information and making it readily available to operational crews. *[Note: this was a requirement of the FRS National Framework 2008–2011 which was current at the time the guidance was published. The 2012 National Framework has no similar requirement.]*

14. The guidance refers to a CFOA national study (in 2003) into the provision of mobile data which examined the roles that support incident ground operations. In particular it emphasises that information needs to be relevant, timely and accurate to ensure effective information is exchanged.

15. The guidance introduces a model approach which it calls *Provision of Operational Risk Information System (PORIS)*. To provide a strategic framework that is compatible with other relevant data and information systems such as the Incident Recording System (IRS), Fire Service Emergency Cover (FSEC) toolkit and generic risk assessments.

16. Of specific interest are the following points:

Guidance reference	**Substantive point**	**LFB position**
para 3.10:	The CFOA national study (2003) into mobile data terminals (MDTs) states that "*... the provision of too much information could put the recipient in' information overload' which may be equally as serious as under provision of information.*"	The avoidance of 'information overload' is at the heart of the decisions made about what data should appear on the Brigade's MDTs. Crews of appliances are most likely to use the MDT en-route to an incident and the amount of information that can be assimilated during that time will be limited. LFB send a dedicated command unit (CU) to serious incidents in accordance with Policy 541, and the CU will have access to ORD and other information via the Command Support System (although not Farynor fire safety data). The information presented to, say, a watch manager on the first attendance could, potentially, be different to that presented to the Brigade Commander taking over the incident commander role at an escalating fire. The availability of data on an MDT does not guarantee that crews will access it. Data about the usage of the MDT is captured and it is proposed that this should be made available as part of the MDT data warehousing/reporting project which is expected to start delivering by end April 2013. The aim is to make a range of self-service reports available which can be used, amongst other things, for performance management. Some sample MDT usage data has been extracted will be considered by the ODCB.
para 3.13	Individual FRSs are free to develop their own systems ... departure from the principles contained within this guidance should only be taken following a risk based assessment ... which clearly illustrates that the legal responsibilities have been met.	LFB has already developed its own arrangements which are similar in many respects to those outlined in the guidance. In addition all LFB policies are reviewed on a regular basis to maintain the currency and their relevance to national guidance and legislation.

Guidance reference	Substantive point	LFB position
para 3.22:	The FRS Information Technology strategy should also include formalised data sharing protocols with other Category 1 and 2 responders.	LFB policy 621 deals with information sharing generally and information/data sharing is covered by the LFB Information Strategy. In practice the LFB routinely shares information both in a proactive and reactive manner when supporting multi-agency pre-planned events and responding to emergencies. The LFB has established protocols in place for sharing information when developing multi-agency event plans and is a key partner within the London Resilience Team (LRT), which includes many of the non-emergency service organisations. During emergencies information is shared at both the 'Silver' and 'Gold' level of Command and we have proven protocols for working within a multi-agency context within the MPS's Special Operations Room. In addition, when the London Local Authority Coordination Centre (LLACC) is in operation staff from the Brigade's Emergency Planning department have responsibility for collating and sharing information across the 32 London boroughs and the City. See also the comment against para 5.6/5.8 below.

Section 4 – Legal Framework

17. This section of the guidance details the specific legislation and regulations that place responsibility on each FRS to gather risk information and make it available for operational crews.

Section 5 – Strategic framework

18. This section deals with an FRS's strategic responsibility for ownership and to establish the 'policy' for the management of operational risk information as part of an integrated approach to manage risk and provide safe systems of work. Items of specific interest are:

Guidance reference	Substantive point	LFB position/comments
Sections 5.6/5.8	Reiterate the need for sharing of risk information between FRSs and other organisations.	Effective interoperable working would need to be on the basis of an agreed national approach and between all emergency responders. There would be benefit in concluding information sharing arrangements with each of our seven neighbouring brigades. So, there is a tactical approach that seeks to find ways of sharing as much information as possible as quickly as possible, with a longer term, more strategic, goal of finding a way of sharing information according to an agreed and common format. Common data standards would need to be in place to ensure data sharing between all responders and this needs national leadership if it is to be effective. Individual brigades could not achieve the data sharing envisaged by the guidance. There is a Cabinet Office project, Direct Electronic Information Transfer (DEIT), which formulated some sound principles around this and is continuing now. Some work has also been undertaken by CFOA through the Joint Emergency Services Interoperability Programme (JESIP) initiative on interoperability and it will be important to be involved in, and keep in touch with, this work. Some initial meetings have been held with some neighbouring brigades to discuss the sharing of risk/hazard data held in the ORD; further work is needed to agree actual arrangements for data sharing. The key to effective sharing is consistent geographic referencing; this is covered in more detail below. The new mutual assistance agreements with neighbouring brigades include a specific clause about sharing hazard information and the need to put in place arrangements to make this information readily available en-route to an incident to support safe systems of work. In June 2011, LFB wrote to all neighbouring FRAs informing them that their emergency crews providing mutual assistance to the LFB request hazard information via our control room on their dedicated talk group. Sharing of information with neighbouring brigades is not easily delivered. It is one thing to have a clear strategic direction and a willingness for this to happen but the actual practicalities for making it happen should not be under-estimated. The lack of a common data platform, inconsistency in data quality, different approaches to geo-coding of data and the availability of resources (both people and finance) to make it happen, are key constraints in the short-term. It is not clear whether the current national initiatives (e.g. JESIP) will deliver practical arrangements for sharing other than a common standard. Sharing may not progress without adequate national funding (although in the current climate this may not be forthcoming).

Guidance reference	Substantive point	LFB position/comments
para 5.10	Strategic managers must ensure that policies and procedures developed for managing all aspects of operational risk information are consistent and supportive of data protection and information system security.	LFB has a wide range of policies as detailed earlier in this paper.
para 5.11	The management of operational risk information must also take into account the existing and future needs for interoperability and mutual aid between neighbouring FRS' and other Category 1 responders.	See comment against paras 5.6/5.8 above. As already mentioned, some initial discussions have taken place about data sharing with neighbouring brigades. The significant issues are (a) geographic referencing of the data in a way that is useful to others, and (b) the consistency and quality of LFB data. There is extensive liaison, including the sharing of premises risk information, with other Category 1 responders in London via a variety of arrangements, including the via ILOs. This expresses the need for a consistent approach with way of sharing data. Giving responsibility to achieve this to each FRS will not achieve the objectives set out in national guidance without some national coordination and common data standards (as outlined elsewhere). Working within the framework of the JESIP will help to progress this.
para 5.12	To be effective, new management systems should integrate with existing systems.	The Brigade's ORD is linked to the Station Diary outside duty visit schedule. Station Diary is linked to other Brigade system (e.g. IMS, StARS, ITR). Potential further links with the Farynor fire safety system have been identified. It is also likely that the ORD will be linked to the new mobilising system. Sharing should not just be within a service, but externally with other emergency responders. Some work nationally was completed in 2010 (by the Home Office) which showed how LFB operational information from our Command Support System could be shared with the MPS command planning system. This work was transferred to the Cabinet office sponsored National Resilience Extranet, so was available to all Category 1 and 2 to allow the sharing of files that were classed as 'restricted'. Cabinet Office ministers have recently (January 2013) confirmed their commitment to continuing the NRE service beyond 2013, when the contract with the existing service supplier expires. The NRE team is working with suppliers to develop requirement and recommendations for the future service and are planning to hold stakeholder workshops in the near future to provide an update on this work and gather further input from the resilience community.

Section 6 – Data and information management – continual improvement

19. The main points to consider in these sections are:

Guidance reference	Substantive point	LFB position/comments
Para 6.2	Recommendation that FRS should consider ISO 9001 compliance to ensure appropriate health and safety management.	The Head of Operational Assurance (HoOA) says that the relevant standard for health and safety management is OHSAS 18001; ISO 9001 is the general quality management standard. OHSAS18001 is a total health and safety management system – and recording of the reactive safety data (e.g. accidents/injuries) is only a very small portion of it. The HoOA would not recommend that the Brigade works towards compliance with this standard now, although we could aim for compliance within a few years. It would be an expensive process. The aim is undertake the RoSPA Quality Safety Audit (QSA) process in the first instance.
Para 6.3	Development and implementation of the risk information management system must be a shared process and consider the end user. The system should be owned and led by a member of the senior management team.	The development of the LFB ORD and its feed to the MDT involved all key stakeholders. Accessing data via the MDT involved station users. Issues related to the ORD and MDTs are overseen by the Operational Directorates Coordination Board (ODCB) chaired by the Deputy Commissioner.
Para 6.4	An initial status review should be conducted to provide information of the scope adequacy and potential gaps within current systems.	This report attempts to identify how the Brigade's current arrangements meet those set out in national guidance. No further review is proposed.
Para 6.5	Arrangements should be made to review non-conformity, either as a result of training, at incidents or through regular supervision... lessons learned should be communicated so they benefit the whole organisation. Findings should also be shared with other FRSs and emergency responders.	The Brigade has a sophisticated process in place to identify performance issues via the Incident Monitoring Process, accident investigations, etc. and the tools available to remedy identified issues (e.g. via Ops News, training packages and courses and the PDP system). The whole process is overseen by the ODCB involving all the key strategic managers.

Section 7 – Security of information

20. Section 7 of the guidance deals with information security. It points to the guidance produced by the Centre for the Protection of the National Infrastructure on information assurance, risk management and accreditation of information systems.

Guidance reference	Substantive point	LFB position/comments
Para 7.5	Site specific information for assets which are part of the Critical National Infrastructure (CNI) will require particular care in dealing with security of the information that will be required for dealing with an emergency.	See comment under para 7.8 and para 7.10 below.
Para 7.8	Arrangements for the security of operational risk information must be consistent with the Protective Marking Framework.	All information held on the ORD is unprotected in terms of the LFB's Protective Marking Framework (policy 619). The MDT is an unsecured device and is accessible without the need for a logon ID or password. It is therefore not appropriate to include any data that would require a protective marking (protect and above). As explained under para 7.9 below there are arrangements for crews to access further (sensitive) information.
Para 7.9	Site specific information may need to be security assessed to ensure it is suitable for use via MDTs.	Whilst all risk information is held on the ORD there are some restrictions are in place on what data is displayed on the MDT. ORD data including what may be described as 'sensitive' information, is available for all LFB users (including Control Officers) to view via the on-line Hazard information search. Therefore, no sensitive information is available via the MDT. Crews are alerted to ask for more details when needing to access such data for particular premises (i.e. 'yankee' hazards) and Control Officers can provide more information. The facility could be expanded to deal with any other sensitive information. For example, crews have been discouraged from recording building or gate access codes on the MDT record.
Para 7.10	Alternative arrangements need to be made where the FRS is not provided with site specific information due to security restrictions.	We do from time to time come across premises where site specific information is so sensitive that it would not be appropriate to use normal systems such as the MDT (e.g. embassies). In such cases we remind a responsible person of their duty to provide us with information but this can in the form of a 'grab bag' which is only made available in the event of an emergency. Another solution is the provision of premise information boxes (policy 513) which allows information to be stored securely onsite and crews can access using a security key when needed.

Section 8 – Practical considerations

21. This section of the guidance looks at practical matters.

Guidance reference	Substantive point	LFB position/comments
Para 8.1 to 8.4	Standard terminology and symbology should be used to ensure effective interoperability between emergency responders and the sharing of data.	The JESIP work programme includes common symbology to support interoperability and the Brigade would seek to use this. See para 5.6/5.8 (above) about JESIP. The Civil Contingencies Secretariat in Cabinet Office, working with MOD and Ordnance Survey, has created a set of common map symbols, to promote interoperability between emergency responders. Work is now underway to make these symbols available, at no cost to end users, in a technical format that can be downloaded and used within existing Geographical Information Systems (GIS). This will be examined to understand the extent to which other responders will be adopting it and how it can be implemented in the Brigade.
Para 8.5 to 8.11	Consideration should be given to the production of unique premises identification and that data is synchronised where necessary. The unique identifiers used by the Local Land and Property Gazetteer (LLPG) and the (proposed) National Address Gazetteer are mentioned as examples.	The Brigade already has a corporate gazetteer based on the National Land and Property Gazetteer (NLPG). The Brigade is also committed to migrating to the successor AddressBase (National Address Gazetteer) product from Ordnance Survey (OS). The corporate gazetteer is already integrated with the Farynor system and a new project will extend the integration to all location-based Brigade systems including the ORD.

Guidance reference	Substantive point	LFB position/comments
Para 8.12	Information should be gathered or reviewed directly through inspection or site visits, or indirectly by collecting information from responsible persons, occupiers, owners or other agencies. Procedures should be in place for gathering and reviewing such information.	Gathering information from inspections and site visits is a key part of the process of identifying premises-based operational risk as set out in LFB policy 800, although this deals only the gathering of data by station staff. Whilst PN800 does not exclude the collection of information from, say, responsible persons this form of information gathering is not specifically mentioned. However, the MDT governance board is made aware of potential other data sources, particularly those that could be obtained directly from responsible persons, occupiers, owners or other agencies. Some work has been undertaken to attempt to gather information directly from other organisations (e.g. for electricity sub-stations within buildings) although there have been problems obtaining the right quality of data (particularly with accurate geo-coding to allow it to be mapped properly on MDT maps). Also, in order to keep the ORD current, a main principle about data is that it is capable of being kept up-to-date and that would need to be a principle that underpins data collection. There is a view that if the Brigade is provided with information by a third party could we be criticised for not making it available to crews. An example of this is the data that is provided, via the web site, about asbestos risks. The MDT governance meeting has considered this but has rejected adding such records to the ORD because (a) the potential presence of asbestos sin buildings is a generic risk which crews need to consider; (b) the data is by no mean comprehensive and having some data may give crew a false impress that the ORD is comprehensive; and (c) the lack of any arrangements to maintain the data and keep it current. The ODCB endorsed this approach. However, there may be benefits of information gathering direct from the responsible person or others, without a site visit and the opportunities to do this could be explored further.
Para 8.13	Fire safety and operational data capture should be integrated and to take account of the plans of other Category 1 and 2 responders and other agencies.	Fire safety data (including data from fire safety engineering) is not routinely added to the ORD. Addresses with recognised fire safety engineering solutions are highlighted to crews on the MDT as part of the mobilisation message (although these details are not on ORD); a fire safety officer is ordered to a confirmed fire to these buildings. An early decision was taken during the development of the ORD that this would not add value to the existing data derived from station outside duty visits. There is an existing arrangement for fire safety inspecting officers to alert stations when they believe a regular visit to a particular site or building may be of benefit to operational crews. A electronic way of achieving this exchange of data between the Farynor and Station Diary systems is an agreed enhancement that may be possible with Station Diary re-build due to commence in 2013.

Guidance reference	Substantive point	LFB position/comments
Para 8.13	The guidance provides a suggested template for gathering information; it is 19 pages and predominantly related to premises fire safety and operational response matters.	The Brigade has already developed a template to capture data for the ORD. There is little attention within the national guidance template for planning in relation to four of the six risk groups previously highlighted in the PORIS model (i.e. environmental, community, heritage and economic). The national form also fails to provide initial incident commanders with tactical plans for the dynamic and risk critical early stages which could therefore lead to the information overload that its implementation was meant to avoid. LFB ORD provides for the inclusion of tactical plans. The national form makes no mention of other agencies on the form or significant mention of recovery / restoration to normality.
Para 8.15	Operational risk information can be used at many levels of planning.	ORD data is widely available throughout the Brigade via the desktop version and via the Command Support System (CSS) on the Command Units.
Para 8.16	Where operational risk information is captured, stored and displayed by use of electronic systems, data should be structured to give immediate access to key information and prevent information overload.	The data is available via a map interface on the MDT with each site/building with risk information available shown by an icon and the CSS. This provides ready access to any risk/hazard information. The desktop access to the ORD provides for a proximity search (within X metres) by address.
Para 8.17	One of the challenges is how to process a very large number of sites in order to identify those where the availability of accurate, relevant and timely information may be of value at any reasonably foreseeable incident. Many buildings or risks may not require detailed site specific information in order to expect a safe and successful outcome to operational interventions.	The current process, as outlined in LFB policy 800, is regarded as adequate to identify the key buildings that are likely to present operational risks. The onus is on stations to identify risks on the station ground and to schedule regular visits (if required). The risk matrix in policy 800 provides a way of determining if a site/building should appear on the ORD and the frequency of revisits. Operational News in February 2013 will also include a specific article on recording information relating to complex buildings that are likely to cause difficulties to operational staff in the event of an emergency.

Guidance reference	Substantive point	LFB position/comments
Para 8.20	External sources of information are detailed as Health and Safety Executive, planning and building control, authorities, health authorities, local strategic partnerships, transport and utility companies, the Environment Agency and English Heritage.	Some external data sources are included in the ORD. This includes the location of medical gas cylinders in domestic properties using data supplied by the NHS, and police premises provided by MPS. Some work has been undertaken to obtain the location of electricity sub-stations, although the quality of the data was not adequate for addition to the ORD. The Brigade already has details of all the listed buildings (and structures) in London (some 40,000), although there does not seem any justifiable reason to add them all to the ORD. The risk-based nature of the data collection process, and the risk matrix under policy 800, should determine those that need a regular visit and which need to appear on the ORD.
Para 8.22 to 8.25	The document signposts use of the Fire Service Emergency Cover (FSEC) toolkit that can flag buildings that are risks to firefighters, risks to the environment, heritage risks, critical national sole supplier and of exceptional value.	The Brigade does not use the FSEC toolkit.
Para 8.25 to 8.27	The guidance highlights that much information on buildings is held on fire safety databases. FRSs must ensure that protocols exist for easy and immediate access to this internal information for operational use and arrangements for obtaining and sharing information form external organisations.	The Brigade view on the inclusion of fire safety regulation data is covered under para 8.13 above. This decision could be reviewed to determine whether there would be advantages in inclusion of some or all data. S&P have ready access to data from all Brigade systems.
Para 8.28	Periodic audit is a useful means to enable a deeper and more critical appraisal of the operational risk information systems… and whether the system has been properly implemented and maintained and is effective in meeting organisational policies.	There are inconsistencies in the approach taken by stations about what is included on the ORD and the quality of data capture and usage is variable. Policy 800 (and the risk matrix within it) is designed to improve this over time. It will be useful for the Head of Operational Assurance to review/audit how stations identify sites/buildings that might present a risk or hazard, and the consistency of approach against Policy 800. Such an audit/review should take place once the new training (see comments against para 9.3/9.4 of the guidance) is in place and has been delivered. The Head if OPR believes that it would be useful to synchronise the service standard (on Operational Contingency Planning) with any review to ensure that the Service Standard is fit for purpose.

Guidance reference	Substantive point	LFB position/comments
Para 8.29	Performance indicators for qualitative and quantitative monitoring of performance may be used as part of an on-going review process of the operational risk management system.	The Head of OPR already has local PI data on the 7(2)d visits undertaken by station and watch. See para 8.28 (above) concerning a more qualitative approach.
Para 8.30	There should be a clearly defined protocol for the management of all risk data ... with easy access to all internal data sources.	The purpose of the ORD is defined (see appendix B). Guidelines on the types of data to be included on the ORD is being developed. S&P have ready access to data from all Brigade systems.
Para 8.30 to 8.33	The FRS must decide what information should be given to operational crews attending an incident. The findings of the 2003 CFOA study into mobile data is referenced.	The decisions leading to the ORD effectively determine what the Brigade considers operational crews should have when attending an incident. The MDT/ORD governance board routinely considers and decides on request for data to be added to the ORD (subject to a decision by the ODCB when a conflict exists). See appendix C. Although the national guidance focusses on the delivery of operational risk information via electronic means to crews en-route to incidents, there are a variety of other ways in which attending crews can gather information about the premises being visited, alongside generic risk assessment.

Section 9 – Competency and training

22. Section 9 is intended to assist in achieving a consistent approach within FRSs and between them, and ensure a continuing emphasis on quality founded on common understanding and underpinning knowledge. The guidance states that operational risk information should be incorporated into training to allow personnel to develop their skills in using the information in the operational environment and that it should be recognised as an essential element of Personal Development Systems.

Guidance reference	Substantive point	LFB position/comments
Para 9.3 and 9.4	The provision of timely, accurate and relevant information is highly dependent on the competence of all those involved in the risk information process.... The assessment of operational risk is recognised as an essential element of the IPDS and the associated NOS.	HRD instructed Babcock to put together a new training package (to be published early in 2013) on 7(2)d visits (supported by an Operational News article) and identifying locations that might present a risk and how to record such information on the ORD. An outline of the content of this training package is set out in appendix E.

Guidance reference	Substantive point	LFB position/comments
Para 9.12	Operational risk information should be used during all training and exercises to ensure that operational personnel are able to develop their skills in using the information in the operational environment.	The MDT is available for access by crews when carrying out station based training activities and appliance commanders familiarise themselves with its functionality. All incident command exercises utilise a Command Unit vehicle, which enables the IC team to access all of the available information sources.

Section 10 – Provision of Operational Risk Information System (PORIS)

23. The guidance introduces and suggests the PORIS model for the provision of operational risk information based on risk groups and a staged approach. It notes that individual FRSs are free to develop their own systems following a risk based assessment which clearly illustrates that their legal responsibilities have been met. The PORIS risk groups and five stage approach is set out in appendix D.

Guidance reference	Substantive point	LFB position/comments
para 10.5	The PORIS takes account of the need to identify and assess information, and its relevance to the operational pre-planning and management of risk to six risk groups: • Firefighter safety • Individual and societal • Environment • Community • Heritage • Economic and other	LFB policy 800 looks at sites based on an assessment which covers: • Mandatory inclusions • Operational risk to firefighters • Risk to occupants • Building specific risks (staff, public and firefighters) • Environmental The model does not detail initial identification of sites or suggest how to prioritise at stage 1 which is clearly established within LFB policy detailed later within this report.

Guidance reference	Substantive point	LFB position/comments
para 10.10	The PORIS is based on a five stage process – Stage I – review information held. Stage II – gather additional information (e.g. by site visit). Stage III – information from stage 1 and stage 2 assessed to determine level of risk. Stage IV – determine the appropriate risk management process to be applied to reduce or manage the risk in one or more of the six risk groups. Stage V – providing the operational risk information for use by Incident Commanders and other functional roles.	LFB policy 800 specifies a four stage process: Stage 1 – identification of sites using a Premises Risk Assessment form, based on assessment covering the five risk areas. Stage 2 – information gathering (which can be from a number sources and agencies). Stage 3 – Risk assessment, using a risk matrix, crews will have established a total risk score for the premises which will then determine an ORD entry, visit frequency, whether onsite specific training and /or a site tactical plan is required. Stage 4 – adding data to the Operational Risk Database (which feeds the MDTs).

24. The Brigade's arrangements are fairly similar in approach to those set out in national guidance. The view is that LFB arrangements are robust, realistic and pragmatic and that they have a number of benefits over the 'PORIS' method which is largely aspirational and lacks the ability to filter workloads in the early stages and specific detail in key areas. A key issue for station staff is that the workload of premises to be visited and the frequency of visiting, is manageable within available resources. The risk matrix in Policy 800 is intended to support the priority for, and frequency of, visits, and acts as a filter about the sites and premises that should be on the ORD.

25. The main benefit of LFB arrangements are identification and initial rating of premises at Stage 1 enabling filtering of workloads and allowing a focus on risk critical sites/premises. The total risk score at LFB Stage 3 additionally identifies frequency of visits, training plan and tactical plan requirements.

National interoperability

26. Many of the recommendations in national guidance relate to interoperability between the emergency services, not just in London, but nationally. The Director of Operational Resilience and Training is of the view that LFB is likely to get more leverage on this issue if it is progressed via the Joint Emergency Services Interoperability (JESIP) programme. LFB is currently aiming to secure a seat on the JESIP working group so hopefully we can have more influence going forward.

Providing risk and hazard information to attending crews

27. The response (above) to para 8.30 to 8.33 in the national guidance referenced other means, aside from electronic delivery of information via MDTs and similar, that can be used to forewarn attending crews about potential risk and hazards present in buildings and other places attended as an emergency. These other means include:

- **HazChem plates:** LFB policy 44 (Conveyance, marking and packaging of dangerous substances) describes the requirements for marking hazardous substances transported by road, rail, water and air. The standards described in the policy will alert attending crews to particular hazardous chemicals that might be present when dealing with a transport incident.
- **Workplace safety signs:** The Health and Safety (Safety signs and signals) Regulations 1996 (revised in 2009) sets out the requirements for provision of workplace safety signs. Various LFB policies reference these and such signs provide a visual prompt about potential risks or hazards to fire crews when dealing with emergencies at particular buildings or sites.
- **Premises information (Gerda) boxes:** LFB policies 513[1] (Premises information box systems) describes the arrangements in place for premises information boxes) deal with

The 'Strathclyde' building information plate

28. In Strathclyde, a system of building information plates are available on all residential high-rise buildings in the region and provide fire crews (and other emergency responders) with valuable intelligence about building construction, water supplies and access. A sample plate (which is yellow with black text) and a plate in-situ on a building are at **appendix F**. The information contained in pictogram or lettering covers:

    - Name of building / address (top)
    - Number of floors and height of building in metres (upper left)
    - Number of lifts and floors served (middle left)
    - Number and location of rising mains. Number of hose lengths from "E" entrance to DRM inlet (lower left)
    - Type of unit within building (M=maisonette F =Flat etc. and internal layout depicted by arrow)Hose lengths from DR outlet on floor below at bridgehead to furthest flat entrance door. (upper right)
    - Number of staircases and location on diagram (E =entrance) (middle right)
    - Location of Fire Hydrant and number of hose lengths to entrance (lower right)

    The signs are permanently screwed into position above the main entrance doors.

29. Such information would be invaluable to London crews when attending incidents like those at Salamanca Square and Lakanal, and would augment operational risk data held on the ORD. Some work was undertaken in 2006 or 2007 with Hackney Homes who had agreed to install information plates on all their high-rise residential properties; they were prepared to cover the cost of manufacture and fitting. Hackney Homes could see the value in providing such information to attending fire crews and other agencies and, at approximately £65 a plate, were willing to introduce the plates. As far as can be ascertained, the project was not progressed further.

30. During the discussion on the national guidance on operational risk information, at the Operational Directorates Coordination Board (ODCB), it was concluded that the Brigade should work with a housing provider on a pilot implementation of the information plates in one London borough. The proposal would be to adopt a format for the information plate which is similar to that used in Strathclyde but potentially with a "remarks" section where unusual information could be recorded.

31. Following consultation with Area DACs, the boroughs of Camden ,Tower Hamlets and Lambeth have been suggested as suitable places where a pilot scheme could be run to trial the use of building information plates. The trials would see LFB funding the supply and fitting of the plates, supported by social housing providers and local authorities in the three boroughs. An initial workshop is planned with Lambeth partners in the coming weeks to agree details of the first trial. It is envisaged that the three pilots will be underway by late Spring 2013, with an initial review planned for Autumn 2013. Borough Commanders , liaising closely with housing providers, will identify high rise residential social housing blocks, and especially those with complex or unusual design features or layout. Should the trials prove a success, LFB

[1] Policy 530 (Gerda key) also deals with accessing premises information boxes.

would be advocating that the cost, updating and maintenance of the Building Information Plates should become the responsibility of the local housing provider.

32. The BIPs would have benefits for other emergency responders. The plan would be to inform and educate the local LAS crews about the three pilots, with a view to allowing them to readily identify lifts and staircases on arrival at scene. Likewise, local Police could be provided with basic details for their benefit. During the pilots, it is envisaged that Station Managers and/or Borough Commanders would provide a direct brief to their counterparts in LAS/MPS. If the trial is a success and goes London wide, then more formal arrangements could be put in place to educate and inform the wider LAS/Police communities in London.

Conclusion

33. LFB arrangements in place for the gathering of risk information appear to be robust and largely in compliance with the national operational guidance issued in April 2012. It is not considered necessary or practical to make significant adjustments to current arrangements. A few issues are highlighted for some further action and recommendations are made. An action plan will be developed and progress will be reported to the Board in six months time.

34. Whilst there can be no argument that risk critical information on premises should be available to first attending responders there is clearly a balance to be struck in order to ensure the currency, quantity and quality of the information and the impact on time and other areas of service delivery in collecting and maintaining the information. For the Brigade, it is also important to acknowledge that for many incidents, a Command Unit will also attend which also has access to information.

35. The Board will recognise that it is not possible to know all relevant details about every building in London; there are some 3.3 million residential buildings and nearly 300,000 non-residential buildings in London. Even if that was possible there would be enormous difficulties maintaining the accuracy of the information going forward. The approach needs to be risk based albeit that this does rely on individual perceptions of risk but guided by extant LFB policies, including the risk matrix.

36. Some information required will already be known to the Brigade from fire safety inspections/audits or other Category 1 and 2 responders. It is recommended that consideration be given to understanding the advantages of adding this information to the ORD, so it can appear on MDTs and the CSS.

37. It is recommended that a version of the 'Strathclyde' building information plate be piloted in a London borough to provide crews with essential information about the building that will needed when dealing with an emergency incident.

HSE Report: "The Management of H&S in the GB Fire and Rescue Service" (October 2010) – extract from CMB report in April 2011

Risk Information – Compliant

HSE recommendations and expectations

It is important that the risk critical information provided to an Incident Commander is accurate, timely and suitable (i.e. easily understandable and applicable to the incident). Services need to ensure that their systems to capture and maintain risk critical information are robust to allow appropriate information to be used and understood at the point of use.

All services should ensure that:

- *They provide adequate training for staff gathering and assessing risk critical information*
- *There is a system in place to actively collect relevant risk critical information*
- *They monitor the effectiveness of these arrangements*
- *Risk critical information is kept up to date and is in a suitable format*
- *Incident commanders are able to access the information to inform their command decisions*

The production of national guidance on the classification of risk premises and the collection and dissemination of risk information is recommended.

Authority position

Following the fitting of Mobile Data Terminals (MDT) on frontline appliances (early 2010) which are supported by a robust database (Operational Risk Database) the provision of instantly accessible safety critical information to Incident Commanders has now been greatly enhanced. As risks are identified by crews the information is added or updated on the database ensuring that it is current and readily available during incidents. This process forms part of the regular mandatory outside duty visits that are undertaken, maintained and updated by station personnel.

Training is undertaken as part of all Officer Development Courses. Computer based training packages have been produced and have been mandatory for all officers at station. There is also a range of comprehensive 'help' materials on the Brigade's Intranet with supporting telephone help desks provided by Information Management.

Risk Information quality assurance processes are in place with monitoring of all new or updated information carried out by Stations Managers, Predetermined Attendance Section (For risk information) and the Operational & Event Planning Team (For Operational Plan information)

Guidance in relation to the information required to populate the MDT database has been given to stations by the Operational & Events Planning Team & the Fire Safety Regulation team. A template was provided giving detailed instructions on the operationally important information required to assist crews forming the first attendance at an incident. Stations complete these templates electronically and they are then uploaded on to the MDT.

Regular station visits, updated risk information which is robustly quality assured and regular downloads from the ORD to MDTs ensures that the level of risk information available to front line crews and incident commanders is as current as reasonably possible. This now enables Incident Commanders to make the best informed command decisions based on quality risk information.

Training in building construction is provided to trainees during their initial training and covers firefighting in basements, high rise, firefighting in buildings, sandwich panels, gang-nailed roof trusses, signs and symptoms of collapse.

There are several training support packages available to stations through the Training Support Icon, including those provided in conjunction with Operational News. Packages include:

- Modern methods of construction
- Signs and symptoms of collapse
- Roof structures
- Sandwich panels

This training is station led with no formal assessment.

Notwithstanding the above, other more generic training support packs have been created for station staff (Operational professionalism – Focusing on the basics), which also include links to relevant policy notes on the computer desktop. Information has also been communicated to staff through internal communications messages (e.g. high rise firefighting, 26/11/08, fires in large buildings with high ceilings, 01/09/06) and Operational News (Nos 6 & 8).

Purpose of the ORD

The Operational Risk Database (ORD) holds details of premise based hazards that may impact on a safe and effective operational response. The ORD will be the main source of information to provide incident/appliance commanders with information about potential hazards at incidents and allow them to put in place safe systems of work. These hazards may not generally be associated with a particular type of premise or, where they might be expected, the extent of the hazard or its location may not be obvious.

Where appropriate, the ORD will detail any specific measures or actions (e.g. a contingency plan) that might need to be put in place to deal with an incident (to address the identified hazards).

Data on the ORD will be derived mainly from premises based hazards identified by station personnel as part of outside duty activities (as set out in Policy 800). Data on the ORD may also be obtained from other internal or external data sources. For data to be included in the ORD it will, at minimum, need to:

- Have full location (geographic) information about the identified hazard.
- Be kept current and relevant by either a regular updating process (e.g. links with the Station Diary outside duty master schedule), or by regular re-supply arrangements with internal or external sources (supported where appropriate by formal data sharing agreement and/or a Memorandum of Understanding).

ORD data will be available via (a) the appliance Mobile Data terminal (MDT); and (b) a desktop computer application.

The lead for the ORD will be Strategy & Performance Department.

Policy 800 (Information gathering/contingency plans) deals with the collection of risk/hazard information; Policy 748 deals with the use of risk/hazard information in connection with incidents via the MDT.

Definitions:

Hazard is something with the potential to cause harm. This can include articles, substances, plant and machinery, methods of work, the working environment and other aspects of work organisation.

Risk is the likelihood of potential harm from that hazard being realised. The extent of the risk will depend on:

- the likelihood of the harm occurring;
- the potential severity of that harm, i.e. of any resultant injury or adverse health effect;
- the population that might be affected by the hazard, i.e. the number of people who might be exposed.

Terms of reference for ORD/MDT governance board

To oversee all matters related to the use of Mobile Data Terminals (MDTs) including associated feeder systems (for example, the Operational Risk Database – ORD) and other data sources. In particular to:

- Devise, and commission, training and awareness initiatives, and oversee delivery.
- Oversee software/system upgrades and changes, and determine development priorities.
- Oversee those policies and procedures related to the use of MDTs and the collection o/use of data available on the MDTs.
- Devise and monitor key performance indicators on the availability, currency and use of MDTs.
- Oversee system maintenance and support arrangements.
- Oversee and determine the data sets to be available to crews via the MDT.
- Generally providing organisational assurance regarding the quality of data and use of MDTs (including the ORD).

Membership

Operations and Mobilising
Operational Resilience
Operational Procedures
Information & Communications Technology
Strategy & Performance/PDA
Strategy & Performance/Information Management
Human Resources & Development
Fire Safety Regulation

The Provision of Operational Risk Information System (PORIS)

RISK groups

Firefighter safety
The direct impact on the safety of firefighters (or other emergency responders working under the direction of the Fire and Rescue Services) who may be affected. Encompassing fatalities, injuries, illness or injury or damage to health.

Individual and societal
The personal safety of persons other than firefighters, or other emergency responders working under the direction of the Fire and Rescue Services, who may be directly affected (fatalities, injuries, illness, or injury or damage to health) or indirectly affected because of the strain on the health service.

Environment
The consequences from an onsite event which would result in contamination or pollution of land, water or air with harmful biological / chemical / radioactive matter or oil, flooding, disruption or destruction of plant or animal life.

Community
Encompassing the social consequences of an event, including availability of social welfare provision; disruption of facilities for transport; damage to property; disruption of the supply of money, food, water, energy, or fuel; disruption of an electronic or other system of communication; homelessness, evacuation, avoidance of behaviour; and public disorder due to anger, fear, and / or lack of trust in the authorities. **The Provision of Operational Risk Information**

Heritage
Recognition of the value placed by society on the site's cultural and historic presence as part of the fabric of the national and local community. Encompassing where possible the net economic cost, including both direct (e.g. loss of artefacts, goods, buildings, structures, etc.) and indirect (loss of business, tourism, etc.) costs.

Economic and other
Encompassing the net economic cost, including both direct (e.g. loss of goods, buildings, infrastructure) and indirect (loss of business, increased demand for public services) costs. Also, risks, other than those identified in the remaining risk groups (see above), listed that are judged of importance to the national or local economy.

A five stage approach

Stage 1: Site Risk Analysis:
a) review information (internal / external) held relating to a site.
b) prioritise.
c) make critical information available to crews.

Stage 2: Data Gathering
a) capture additional relevant information (site visit)

Stage 3: Site Specific Risk Analysis
a) Risk assessment to determine level of risk presented for each of the risk groups.
b) establish visit frequency and review periods.

Stage 4: Risk Management
a) develop risk management controls in conjunction with other agencies.
b) provision of appropriate knowledge and training.

Stage 5: Information Distribution
a) delivery of accurate, relevant and timely information to crews.

Appendix E

Computer-based training package for 7(2)(d) visits – specification (Operational News February 2013)

All Operational Staff require knowledge of what is required when carrying out a 7(2)(d) visit, including those at high rise premises.
This specification was created collaboratively between LFB stakeholders and BTL.

By the end of the session, candidates will be able to:

1) **State what a 7(2)(d) visit is and why the London Fire Brigade have a responsibility to conduct them.**
   - 1.1 Define 7(2)(d) as per Fire and Rescue Services Act 2004
   - 1.2 Explain the benefits of 7(2)(d) visits for personnel in station ground familiarisation
   - 1.3 List the benefits of 7(2)(d) visits in preplanning on arrival tactics
   - 1.4 State the importance of sharing the information gathered from 7(2)(d) visits within the London Fire Brigade and with relevant agencies

   This objective will comprise module one, which will consist of two screens.
   - The first will outline the Fire and Rescue Services Act 2004.
   - The second will emphasise the three key purposes of 7 (2)(d) visits: Familiarisation, Pre – Planning and Information Sharing. Links to Policy 800 – Information Gathering.

2) **Demonstrate the process used to determine the premises which require 7(2)(d) visits.**
   - 2.1 Identify the two components of a Premises Risk Assessment
   - 2.2 State where the Premises Risk Assessment is located
   - 2.3 Apply a Risk Based Approach to three premise type examples and decide their 7(2)(d) visit frequency

   This objective will comprise module two, this will consist of two screens.
   - The first will be visual representation of a Premises Risk Assessment and the Risk Grading Matrix, with hotspots highlighting where they can be found and how they should be used.
   - The second will have 3 – 4 different premises shown, the user will apply the Risk Based Approach to each of the premises, using the information they have via hotspots, to determine its risk score and visit frequency. E.g. LU station, Large Textile Manufacturers with over 500 staff, High rise flats (10 floors) with traction lift and vandalised exterior, Asylum seeker refuge centre with residential facilities, domestic terraced house.

3) **Identify the types of information to be recorded at a 7(2)(d) visit and explain how this data informs a tactical plan.**
   - 3.1 Identify the pre planning information to be recorded from the 7(2)(d) visit scenario
   - 3.2 Identify the risks and hazards present in the 7(2)(d) visit scenario both outside and inside the premise
   - 3.3 Correct and amend the existing recorded data on the MDT for the scenario

   This objective will comprise module 3 and will consist of 2/3 screens:
   - The first will show the existing MDT for the premises to be visited
   - The second will be a virtual tour of a large, complex high rise premises in a busy London Street. The user will have to identify all of the external factors to be recorded on a 7(2)(d) visit before they can commence. External factors may include: Hydrant locations, Parking for pumping & aerial appliances, Means of access and egress from the building, Areas containing hazardous material, Hazardous processes, Radio reception difficulties and communication facilities

Once the factors have been identified the user will take a virtual tour of the internal layout of a building (Salamanca Place was selected) where again they will have to identify all of the factors to be recorded on a 7(2)(d) visit before they can progress with the training package.
Internal factors may include:

- Length of hose runs from dry rising main outlets
- Rising main inlets, outlets, drain valves & access to sprinkler rooms
- Location of Fire Control Room
- Location of information available on site
- Plans for AFA systems and fire suppression systems
- Evacuation arrangements
- Fire fighting shafts and protected lobby areas
- Location and function of the fire lifts and lift machinery
- Plans of floor layouts and fire resisting compartmentation
- Additional security measures – e.g. entrance lobbies or front doors in residential properties
- Areas containing hazardous material
- Hazardous processes
- Fire engineered solutions for the particular premises
- Means of ventilation and smoke control
- Plant rooms and air conditioning installations
- Radio reception difficulties and communication facilities

This section to also include what should be done in the event of broken/ not working fixed installations. Plan, report to PDA and risk critical report to RMC for SFSO.

The third / first slide will then ask the user to identify information in the original MDT that require amendments.

Strathclyde fire and rescue guidance plate