

Witness statement of: Sabrina Cohen-Hatton
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GRENFELL TOWER INQUIRY

WITNESS STATEMENT OF SABRINA COHEN-HATTON

I, Sabrina Cohen-Hatton, will say as follows:

1. I make this statement for the purposes of Phase 2 of the Grenfell Tower Inquiry (“GTI”).
2. In preparing this statement, I have endeavoured to identify documentation or the source of the documentation that may assist the Inquiry. Any documentation that I am able to access and which has not, to the best of my knowledge, previously been provided to the GTI is exhibited to this statement. If any further information becomes known I would be happy to provide a further statement if required.
3. I am willing to attend the GTI to answer questions or provide any further assistance that may be deemed appropriate.

Introduction

4. I have been the Chief Fire Officer of West Sussex Fire and Rescue Service since 1 September 2019. I have also chaired the National Command and Control User Group (“NCCUG”) since 2019 and I am a member of the National Operational Effectiveness Working Group, having been a member of both since 2013.
5. I began my career in the South Wales Fire and Rescue Service in 2001, where I undertook various operational roles from firefighter to Watch Manager. Between 2008 and 2012 I performed various middle manager roles, including Borough Commander in Operations and roles in Community Safety such as the National Operational Lead of Young Dragons and the Fire and Rescue Youth Engagement Lead. Between 2012 and 2013, I acted as Assistant Fire and Rescue Advisor to the Welsh Government.

6. In 2013, I was seconded from the South Wales Fire and Rescue Service to become a member of the National Operational Guidance (“**NOG**”) Programme (also referred to as “**NOGP**”). I led core elements of the programme by drafting elements of the new Incident Command guidance and acting as lead author of the Command Skills guidance. I also led a detailed piece of research exploring the human factors associated with Incident Command to provide an evidence base for the revised NOG. I have set out further details of my involvement in the NOGP in response to Query 3 below.
7. I was seconded to head up a research programme on Incident Command for the Chief Fire Officers Association (“**CFOA**”), which was the precursor to the National Fire Chiefs Council (“**NFCC**”). I led the national strategic research into the psychology of Incident Command. Our research informed the Command Skills section of the NOG, which aimed to improve Incident Command decision making strategies. I provided advice to a number of bodies on risk-critical decision making.
8. For reference, officers are assigned a rank at the LFB and then hold specific portfolios or references within that rank. I held a variety of portfolios and references during my time at the LFB and I have set out these to the extent they are relevant below. I was appointed as a Deputy Assistant Commissioner (“**DAC**”) in the LFB in February 2015 and undertook a three-month induction. I was appointed Head of Development at the LFB in June 2015. My responsibilities included leading the Personal and Organisational Development directorates, included within which was a team that acted as the conduit between LFB departments that commissioned new training and the external training provider.
9. In March 2016, I was appointed as North West Area DAC at the LFB. I was responsible for all aspects of service delivery in the 9 boroughs of North West London, including 28 Fire Stations, a Community Safety Team and an Area Support Team.
10. In June 2017 (shortly prior to the fire at Grenfell Tower), I was appointed as DAC of the Operations Review Team. I was responsible for the oversight and assurance of all operational activity in the LFB, including the governance of the Dynamic Intelligent Operational Training system. I was a core member of the NFCC National Operational Learning Board and the LFB representative on the Board (responsible for integrating National Operational Learning into LFB practices).

11. In November 2017, I was seconded from the LFB to be the Inspection Development Lead/ Chief of Staff for Her Majesties Inspectorate of Constabulary and Fire and Rescue Service (the “**Inspectorate**”). My responsibilities were divided between servicing the Inspectorate as the Chief of Staff and leading developments to the inspection process.
12. Shortly prior to my appointment as Chief Fire Officer of West Sussex Fire and Rescue Service, I was seconded from the LFB in 2019 to act as Interim Deputy Chief Fire Officer at Surrey Fire and Rescue Service for a brief period.
13. Whilst serving in the Fire and Rescue Service, I achieved a number of higher educational qualifications on a part time basis, including, Bachelor of Science (Honours) Psychology, PhD Doctor of Psychology and achieving Chartered Psychologist status. In 2013 I was appointed as an Honorary Research Associate at Cardiff University, an Honorary Research Fellow in 2016 and an Honorary Fellow in 2018 in recognition of my contribution to fire (fighter) safety at a national and international level. I also achieved further Fire and Rescue Services qualifications such as Master of Arts focused on International Fire Service Development, the Accredited Wales Strategic Assessment and Development Centre, Wales Multi-Agency Gold Incident Command course and London Multi-Agency Gold Incident Command Course.

Consideration of National Operational Guidance at the LFB

14. By way of context, there was a central policy team at the LFB that considered implementation of NOG. As the policy owners, the Operations Review Team and Operational Assurance Department had ultimate ownership for any policy changes to the extent these related to Incident Command. My role of considering Incident Command initiatives (including any associated with the NOG) would have been in addition to my day-to-day roles and responsibilities at the LFB. My involvement was to support the Incident Command training review due to my involvement in drafting the NOG, expertise in risk-critical decision making and my position on the NCCUG and National Operational Effectiveness Working Group (“**NOEWG**”). As an additional project, I was also involved in the revalidation of Incident Command due to my relevant skills and continued my involvement in this project in my successive roles at the LFB to ensure continuity.
15. In addition to the actions taken below in relation to the NOG and other Incident Command initiatives, I had extensive responsibilities at the LFB. For example, as North

West Area DAC from March 2016 until June 2017, I was responsible for all aspects of service delivery in the 9 boroughs of North West London, which served nearly 3 million people, 28 fire stations, 1300 staff, a community safety team and an area support team. For context, the North West Area of London is larger than some Fire and Rescue Services.

16. The LFB is the largest Fire and Rescue Service in England and it presents unique challenges due to its unique metropolitan profile. Subsequently, there are a number of stages under which any changes are considered and potentially implemented.

National Operational Guidance for Incident Command, 2015

Query 3: Please summarise and explain the involvement that you and/or any other individual within the LFB had, on behalf of the LFB, in drafting the National Operational Guidance for Incident Command that was issued in 2015.

17. By way of background, the LFB was hosting the NOGP on behalf of CFOA and the Local Government Association (“LGA”). All three bodies funded the programme which included the review of Incident Command.
18. I was a member of the NOG project team for Incident Command, whilst serving in the South Wales Fire and Rescue Service; I was not serving in the LFB at the time. I was formally seconded to the NOG team to draft the new Incident Command Guidance. The revised NOG for Incident Command was published in 2015 and the deadline for implementation of the revised NOG was 1 January 2016. I transferred to the LFB during the publication stage of the revised NOG and the drafting of the guidance was completed before my transfer. Nevertheless, in order to assist the GTI, I have set out my knowledge of the drafting process of the NOG below.
19. Between 2013 and 2014, the NOG team reviewed the Incident Command guidance. The team consisted of individuals from a number of Fire and Rescue Services, including (in addition to myself):
 - a. Simon Pilling as Chair (Chief Fire Officer (“CFO”) at West Yorkshire Fire and Rescue Service);
 - b. John Baines as Vice-Chair (Assistant Chief Fire Officer of Tyne and Wear Fire and Rescue Service);

- c. Philip Butler undertaking a literature and legislation review (Group Manager at the LFB);
 - d. Adrian Brown (Area Manager in the East Sussex Fire and Rescue Service);
 - e. Andrew Bowers (Area Manager in the Hampshire Fire and Rescue Service);
and
 - f. Simon Barry undertaking a review of leadership (Temporary Group Manager at the West Midlands Fire and Rescue Service).
20. Any guidance drafted through the NOGP would have been reviewed by NOG Governance and signed off by the NOG Strategic Board. To the best of my recollection, the Board consisted of Chief Fire Officer Roy Wilsher (CFOA), Commissioner Ron Dobson (LFB) and a representative from the LGA.
21. The revised NOG guidance was published in August 2015. The deadline for implementation was 1 January 2016. To the best of my recollection, following the publication of the NOG in 2015, CFO Wilsher wrote to all Chief Fire Officers in his capacity as the CFOA Director of Operations, endorsing the revised NOG, the research itself, and the “Future of Incident Command” report and its associated recommendations. A copy of the covering letter is exhibited to this statement (Exhibit SCH/1).
22. I would expect Fire and Rescue Services to undertake a gap analysis of the recommendations in the NOG against their current policies, as recommended by the NOGP.
23. In addition, the NOEWG endorsed the Future of Incident Command report prior to its publication and progressed a number of national work streams that reflected the recommendations within it. A copy of the NOEWG Business Plan for key areas of work to be progressed in 2017 - 2018 is exhibited to this statement (Exhibit SCH/2). Section 3 of Annex A of the Business Plan includes national work streams that reflect the recommendations in the Future of Incident Command report and these are set out below for ease of reference:
- a. Explore a wide range of methods to replace elements of incident command lost through the decline in operational incidents, giving consideration to methods such as tactical decision-making exercises and other forums to share experiences.

- b. Review methods of debriefing to ensure they are appropriately informative.
- c. Embedment of the Decision Control Process (DCP) in training and operations.
- d. Consider a formalised and recognised national process to qualify or licence individuals to practice incident command across the sector.
- e. Develop an incident command peer review process for organisational assurance.
- f. Develop a behavioural marker scheme for Incident Commanders in line with operational guidance.

Research on Command Skills

- 24. As part of the NOG review work, I led a section on human factors of Incident Command (titled "Command Skills"). Command skills are non-technical skills considered necessary to act effectively as an Incident Commander. Examples of command skills include situational awareness, decision making, communication, leadership and resilience.
- 25. I also led research to better understand the nature and operational effectiveness of decision making. As part of the research, we considered the effectiveness of normative models such as the extant Decision-Making Model ("DMM"). The review of the effectiveness of such models later prompted the development of the Decision Control Process ("DCP").

Research undertaken during NOG review

- 26. During the NOG review, I proposed that research should be undertaken in conjunction with Cardiff University whereby data would be collected from a range of Fire and Rescue Services on how Incident Commanders made decisions, in line with the extant models. I led the research team that accompanied Incident Commanders for 24 hour periods over 6 consecutive days, for a period of 6 weeks. We recorded footage of the entire incident from the perspective of the Incident Commander using helmet cameras. We developed a cognitive interview which we performed on Incident Commanders, following their attendance at incidents along with psychometric tests. The research team then analysed the data and drafted a research paper on the responses of Incident Commanders. The research included participants who were Level 1 (Crew Manager and Watch Manager) and 2 (Station Manager and Group Manager) Incident

Commanders. The research found that there was no statistical difference between the levels of Incident Command that would necessitate further research or undermine the findings.

27. The research paper was accepted for publication and was formally published in the Human Factors research journal in 2015. The research found that decision making often did not follow the sequence of phasing found by normative models (such as the DMM) which were conveyed in current operational guidance. Such models assume that decisions are made analytically, where options are considered, evaluated and activity is planned. Instead, most decisions (around 80%) appeared to rely on intuitive processes. The basis for such action might be more reflexive and automatic, affected by previously established associations that have developed between cues in the environment and associated experiences, such as actions taken, and the resulting outcomes. These more intuitive influences, although triggered by a specific cue in the environment, might or might not be appropriate to the entirety of the given operational environment when considered in line with all other factors. However, the influence of these associations can be very powerful. A commander may fall into a decision trap. These processes were not considered or accounted for within the DMM. It is also true that the levels of situational awareness were relatively low and there was little evidence of consideration of the consequences of action. Our research suggested clearly that operational training and guidance needs to recognise and consider the influences of these different processes. A copy of the research paper is exhibited to this statement (Exhibit SCH/3).
28. The DCP was developed to recognise both the analytical and intuitive processes of the human brain. Decision Controls were developed for Incident Commanders to enable them to focus responses on operational goals; to encourage them to push their situational awareness up to the highest level and consciously consider the potential consequences of these actions; and to explicitly ensure that the benefit of a decision outweighed the risk. These techniques are designed to minimise the potential for unexpected consequences that might occur when decisions are made intuitively. Furthermore, our research showed the decision control process didn't slow down decision-making. It recognised and supported intuitive decisions, in a way that protected against decision traps, where previous decision models had failed to do so. This is also an important consideration to assist with learning when scrutinising a decision post-incident, as the different decision types (analytical and intuitive) lead to different decision-making considerations and behaviours.

Research undertaken during secondment to CFOA

29. As set out above, I was then seconded to CFOA (the precursor of the NFCC) to lead national decision trials exploring the effectiveness of the DCP compared with the DMM. The primary driver for this work was to improve the safety of firefighters and of the public by supporting commanders making decisions in uncertain and dynamic circumstances. The trials were intended to assess whether the assumed benefits of the DCP were effective in practice. The trials involved training 84 Incident Commanders, half with the DMM and half with the DCP. A copy of the research paper is exhibited to this statement (Exhibit SCH/4).
30. The Incident Commanders then applied either the DCP or DMM in a number of scenarios including: virtual reality simulations of incidents, mock incidents at the training ground at the Fire Service College, and in live burns in the Hampshire Fire and Rescue Service. The incidents trialled varied depending on risk, pressure, time and fire behaving unexpectedly. This also enabled us to explore how different training contexts affected the decision-making process given that incidents are reducing, and therefore so is experience, and training is a key method of supplementing experience.
31. Our conclusion from the trials was that Incident Commanders were more likely to be goal orientated and had better situational awareness when the DCP was applied, rather than the DMM. These factors taken together are likely to help to reduce the circumstances in which decision inertia can occur by reducing uncertainty, (through improving situational awareness) and helping commanders to focus on operational goals to reduce an over-focus on accountability anxieties which can hamper decision making.
32. I was subsequently part of a working group to refresh the Joint Emergency Services Interoperability Programme (“JESIP”) doctrine. We included the work in relation to the DCP in the re-fresh of JESIP so that the findings of our research were extended to support multi-agency responses and multiple control services. Section 8.1.6 of the JESIP Joint Doctrine sets out the decision controls and would be used by all commanders involved in multi-agency incidents, up to Level 4 (strategic commanders). A copy of the Joint Doctrine is exhibited to this statement (Exhibit SCH/5).

Incident Literature Review 2014

33. GM Butler undertook a literature review in 2014 to establish the work themes of the NOG Incident Command Project.

34. GM Butler produced a briefing note to AC Cotton and DAC Ellis (dated 15 December 2014), a copy of which is exhibited to this statement (Exhibit SCH/6).
35. I did not have formal involvement in the production or presentation of GM Butler's briefing note. However, GM Butler's literature review was used as the basis for the NOG and I was therefore familiar with the literature review and the application of the review with the activities we subsequently undertook with the NOG.
36. GM Butler sets out a number of recommendations in the briefing note, including that, where a policy does not exist for a critical aspect of Incident Command, the LFB directs Babcock to include it to develop appropriate training. To the best of my knowledge, Babcock will only base their training on published LFB policy.
37. GM Butler lists a number of these critical aspects that should be included in training, including but not limited to:
 - a. Consideration of human factors for incident command, or the Command Skills to be included in NOG for Incident Command.
 - b. The Decision Control Method as it is to be included in NOG for Incident Command.
 - c. Operational Discretion for which a draft policy note exists and it is to be included in NOG for Incident Command.

Query 4(i): action that was taken and/or considered in relation to the Decision Control Process that was introduced by the National Operational Guidance.

Prior to Publication of the NOG

38. Prior to the publication of the NOG, on 7 April 2015, GM Butler sent an email to James Dalgleish, AC Dave Brown, AC Cotton and DAC Ellis regarding draft text to be used to direct Babcock to include or exclude aspects of Incident Command. A copy of the e-mail is exhibited to this statement (Exhibit SCH/7). GM Butler's e-mail notes,
 - a. *"The LFB recognises that at present it is awaiting the production of national guidance before it develops any policies that relate to a number of key features of incident command that will form part of the National Operational Guidance of Incident Command... In recognition of this and the importance of the*

anticipated changes within the national guidance, it is necessary that the Incident Command Training Review ought to include the following:

- i. Command Skills, i.e. the human factors of incident command that describe how to be an effective incident commander to reduce the likelihood of human error. Specifically:*
 - a. Leadership*
 - b. Decision Making*
 - c. Situational Awareness*
 - d. Teamwork*
 - e. Personal Resilience*
 - f. Interpersonal Communication*
- ii. The Decision Control Process, i.e. the revised Decision-Making Model which includes the addition of decision controls and reflects the decision making methods used by incident commanders.*
- iii. Revised definitions of Tactical Modes: Offensive and Defensive; and the removal of the Transitional Mode to be replaced with communication of the tactical modes in each sector, whenever they are different.”*

- 39. The Incident Command Training Review with Babcock should include the DCP and refers to the DCP as a “revised DMM”.
- 40. In addition, on 12 August 2015, I received an e-mail from Group Manager Lee Drawbridge attaching a report titled “National Operational Guidance - Incident Command. Provisional Impact Review”. Copies of the e-mail and report are exhibited to this statement (Exhibits SCH/8 and SCH/9). Page 3 of the report refers to the DCP as “*an illustration of how Incident Commanders think and will therefore be a useful tool for selection and development but should not lead to wholesale changes in the DMM or other policies*”. The report was not recommending that the DCP be implemented. As set out in the exhibited e-mail, I responded to GM Drawbridge’s e-mail by clarifying that the DCP was a fundamental piece of National Guidance as opposed to an illustration; this was not the spirit in which the DCP was intended and our research had identified benefits to the DCP. I also suggested that the Future of Incident Command

recommendations were considered as part of the working group. As set out in the exhibited e-mail, AC Cotton asked to discuss the DCP with me, following which I briefed my recommendations to her.

41. Ultimately, I was informed that it would not be incorporated into the LFB's Incident Command policy at that time, although I cannot speak to the decision making around this as I was not party to it. I am also unsighted on how, or whether, the Future of Incident Command recommendations were formally considered by the LFB at this time.

Following Publication of the NOG

42. Fire and Rescue Services are notified that revised NOG has been published and it is then each Service's responsibility to review the NOG, undertake a gap analysis and present it to their relevant Management Board.
43. To the best of my recollection, the LFB's Operational Assurance Department was responsible for considering the implementation of the revised policy changes as a result of the NOG for Incident Command. At the time of the publication of the revised NOG in August 2015, the duty holders were Dany Cotton as AC and Graham Ellis as DAC. I recall that GM Butler also assisted the department when he returned to the LFB and was seconded to Babcock for a period. My role at the time did not have any responsibility for the consideration or implementation of the NOG or the DCP, therefore I was not formally involved. However, due to my involvement in developing the DCP, I had limited internal discussions at the LFB regarding the implementation of the DCP. I have set out these discussions, to the best of my recollection, below.
44. I understand that a paper was drafted titled "National Operational Guidance - Incident Command", which was presented to the Corporate Management Board ("CMB") by AC Cotton. I did not receive this paper in a formal capacity, however I was able to access the paper via the LFB's Share Point site whilst I was drafting a briefing note to Steve Apter in 2017. I would expect that the paper was presented to the CMB. A copy of the paper is exhibited to this statement (Exhibit SCH/10). Any questions regarding the discussion of the paper would be more appropriately directed at individuals that attended the meeting of the CMB.
45. I understand that by May 2017, the LFB view remained that it would not move away from the DMM, however, the LFB acknowledged that improvements could be made to the DMM.

46. An e-mail from GM Drawbridge (dated 05 May 2017) to the NCCUG explains that the:
- a. *“LFB have made a strategic decision not to move away from the Decision Making Model (DMM) as it is felt that there is insufficient evidence to support this when balanced against the business change implications... However, we do acknowledge that the DMM could be improved to take account of recent doctrine changes and to improve understanding”.*
47. A copy of the e-mail is exhibited to this statement (Exhibit SCH/11).
48. I became Head of the Operational Review Team in June 2017 and then had responsibility for Incident Command Policy. Upon commencement of my role, I began to draft a paper titled “Decision Making Model Policy Review” for the Director of Safety and Assurance, Steve Apter, in relation to the scheduled DMM policy review. In order to prepare the report, I liaised with Rachel Wetheridge, the NOG Implementation Lead, at the LFB. It was encouraged that the DMM should be reviewed to reflect the NOG. A copy of my report and covering e-mail is exhibited to this statement (Exhibit SCH/12). The report recommended the adoption of the DCP. To the best of my knowledge, Steve Apter later presented these findings to the CMB and it was suggested that the DCP should be adopted. I am unable to speak to the reasons for not implementing the DCP.
49. The report references the two pieces of research conducted that both informed and tested the revised NOG. The research found that:
- a. The DMM did not account for the processes by which most command decisions are made;
 - b. Most command decisions were reflexive and intuitive, rather than reflective and analytical;
 - c. Situational awareness levels were relatively low; and
 - d. Operational experience changes the way decisions were made.
50. These findings were considered in a revised model - the DCP. Following which, the DCP was tested on CFA/NFCC sponsored National Decision Trials and the following benefits were identified:
- a. Representation of both intuitive and analytical decisions;

- b. More goal directed activity when the DCP was used in direct comparison to the DMM; and
 - c. Significantly greater levels of situational awareness when the DCP was used in direct comparison to the DMM.
51. To the best of my knowledge, it was agreed that the DCP should continue to be developed for implementation at the LFB. On 22 November 2017, at a meeting of the CMB, it was noted that the implementation of the DCP should continue (subject to an Equality Impact Assessment). For clarity, I was no longer at the LFB at the time. A copy of the CMB minutes is exhibited to this statement (Exhibit SCH/13). I cannot speak of the extent to which the DCP was progressed further and any additional queries would be more appropriately directed at a current member of the LFB.

Query 4(ii): action that was taken and/or considered in relation to the concept of Operational Discretion that was introduced by the National Operational Guidance.

52. I was not formally involved in actions that were taken or the consideration of the concept of Operational Discretion that was introduced by the NOG. I therefore cannot speak to action that was taken or consideration of the concept of Operational Discretion.

Query 4(iii) action that was taken and/or considered in relation to any or all of the four future challenges for incident command that were identified in Part 4 of the CFOA paper 'The Future of Incident Command', published in August 2015 (namely: the declining operational experience of ICs; the need to avoid risk and decision inertia; the need to ensure robust systems for the selection, assessment and development of ICs; and the need to improve decision-making under the pressures of complex and major incidents).

53. A number of initiatives were taken forward to address the challenges identified in Part 4 of the CFOA paper that relate to Incident Command. I have set out below the following initiatives relevant to these challenges:
- a. Training of Incident Commanders: As set out below, it was proposed that trainers should have the appropriate knowledge and experience of human behavioural factors that impact specific levels of Incident Command, and the precise pressures faced by each command level. This addressed the "need to avoid risk and decision inertia", "the need to improve decision-making under

the pressures of complex and major incidents”, and “the need to ensure robust systems for the selection, assessment and development of ICs” identified in the CFOA paper;

- b. Personal Development Plan review: As set out below, a review of the way in which areas for development were identified in operational staff and their skills developed at the LFB was intended to “ensure robust systems for the selection, assessment and development of ICs” and “the need to avoid risk and decision inertia” as set out in the CFOA paper; and
- c. Revalidation of Incident Command: As set out below, it was proposed that a process should be introduced to revalidate Incident Commanders’ training in light of the identification of “declining operational experience of ICs” and the “need to ensure robust systems for the selection, assessment and development of ICs” identified in the CFOA paper.

I have addressed each initiative in chronological order.

(A) Training of Incident Commanders

- 54. Prior to my arrival at the LFB, a review of Incident Command Training was initiated (formal training provided upon promotion and refresher courses). The Incident Command Project Board (“ICPB”)¹ was the governing board for this review. Upon my arrival at the LFB in 2015, I was invited to be co-opted onto the ICPB to support the Incident Command Training review due to my involvement in drafting the NOG.
- 55. One of the teams in the department that I ran, project managed the relationship between the commissioning department and Babcock Training Ltd. (“**Babcock**”). I understand that Babcock ensured that training provided was in line with current LFB policy and, in the absence of an amendment to the LFB’s policies on Incident Command, would not revise training. The commissioning department within the LFB was responsible for signing off on the training. To the best of my recollection, AC Cotton and DAC Ellis were the individuals responsible for confirming the training requirements and specification in Operational Assurance. For clarity, I did not have direct responsibility for the content of training and was not able to influence the content of training significantly. Nevertheless, AC Cotton agreed that I could present the

¹ To the best of my recollection, this may previously have been called the Incident Management Project Board

concept of Decision Controls to Babcock and refer to it during discussions around decisions made during training. However, this was not a full implementation of the DCP into training. In addition, Babcock trained their Incident Command trainers on human factors so that they had a better understanding of these.

56. I would expect these decisions to be included in ICPB meeting minutes and have set out relevant extracts of ICPB meeting minutes that I have been able to identify below.

- a. ICPB meeting 15 July 2015: I highlighted the importance of ensuring that Babcock trainers were upskilled as per FOIC recommendations. In addition, it was noted that my team carried out work on “Fit to Train” requirements for Babcock trainers, which set out the minimum requirement for trainer experience and competence. Finally, the minutes reference an external provider (Optimus) providing a proposal to train the Babcock trainers on human factors.

A copy of the meeting minutes is exhibited to this statement (Exhibit SCH/14).

- b. ICPB meeting 2 February 2016: In the meeting, I provided feedback on a Babcock training pilot that I observed on 26 January 2016. Included in that feedback was that trainers were not using decision controls in their coaching discussions. It was discussed that trainers would benefit from some further input on situational awareness and how it can be incorporated into training. It was also discussed that it should be ensured that Babcock trainers are “Fit to Train”.

A copy of the draft meeting minutes is exhibited to this statement (Exhibit SCH/15). I understand that the LFB has been unable to locate a final version of these minutes.

- c. ICPB meeting on 28 November 2016: In the meeting, the board discussed that trainers should have the appropriate level of experience for the candidates that they are matched with. This is to ensure that instructors are matched appropriately to candidates and, in particular, can discuss the decision-making process at an appropriate level.

A copy of the meeting minutes is exhibited to this statement (Exhibit SCH/16).

57. I continued to request that Babcock trainers were using Decision Controls as training prompts. Finally, I handed this work stream to DAC Peter Critchell in October 2017

before I transferred to the Inspectorate in November 2017 and any further queries would be more appropriately directed at him.

(B) Personal Development Plans Review

58. I commissioned a review to consider the use of the Personal Development Plan ("PDP"). Copies of two reports to DAC Ops, both dated 22 July 2016, are exhibited to this statement (Exhibits SCH/17 and SCH/18). Personnel could receive an "IMP point", often referred to as a "development point", as a result of feedback on their performance at an operational incident, which could then be reflected in a PDP. The review found that over 90% of the PDPs issued in 2015-2016 related to underperformance. Significant negative connotations existed with PDPs, the receipt of which was often perceived to be punitive. This could make the process of meaningful learning challenging. In addition, the review indicated that people who had received a PDP from an IMP point felt that this had a negative impact on their future operational performance and, in particular, this may increase risk aversion and decision inertia as anxieties over receiving an IMP point may distract from the operational goal at hand. Both the National Operational Guidance for incident command, and the CIOA Future of Incident Command report identify that additional stress and excessive focus on accountability anxieties can have a negative impact on operational decision making, and these phenomena have been linked with risk aversion.
59. On 19 August 2016, I e-mailed AC Dominic Ellis, Peter Groves and GM Drawbridge following discussions regarding the PDP and IMP issues. In the e-mail, I set out the agreed next steps, which include drafting a PDP policy based on a model whereby everyone has a "development portfolio" or CPD to capture areas of development. The e-mail proposes that a PDP policy should be progressed and launched by April 2017. A copy of the e-mail is exhibited to this statement (Exhibit SCH/19). To the best of my recollection, the Personal Development team (in Training and Development) was responsible for developing a PDP policy.
60. As a result, in September 2016 I recommended to the Director of Safety and Assurance that the process should be less punitive and a lifelong learning log should be created to encompass a holistic plan for development as well as maintaining and developing skills for future roles. A copy of a report dated 20 September 2016 is exhibited to this statement (Exhibit SCH/20).

(C) Revalidation of Incident Command

National Report for the Command and Control User Group

61. By way of context, I prepared two national reports (for the NCCUG and NOEWG) regarding the declining experience of Incident Commanders and setting out the benefits of revalidation. These national reports were work streams in the NOEWG's business plan. The report on how services can address the decline in operational experience was shared with and endorsed by the NCCUG in the latter half of 2017. I understand that it is planned that the report is published on the NOG website (UKFRS) as the site develops and discussions are ongoing. A copy of the report to the NCCUG is exhibited to this statement (Exhibit SCH/21).
- a. Appendix 1 (page 31) of this report, re-states the relevant recommendations previously set out in the Future of Incident Command report. It should be noted that the recommendations are still being progressed on a national level and the changes in Incident Command and associated training have continued to evolve gradually since publication of the NOG in 2015. The report on the benefits of revalidation was endorsed by both groups and the recommendation to feed the principles of revalidation into the most recent review of the NOG for Incident Command (2019) was agreed. Revalidation principles have been included in the updated draft guidance, which is due for publication imminently.

Revalidation of Incident Command at the LFB

62. It was proposed that the LFB should introduce a process whereby Incident Commanders' competencies were revalidated to ensure that they had sufficient operational knowledge and experience to respond competently at incidents. As Head of Development, I was responsible for reporting to the CMB on the progress of the implementation of a process for revalidation. I have set out my knowledge of the status of the implementation below.
63. I prepared a number of reports to the CMB and the Commissioners Group regarding the implementation of a process for revalidation of Incident Command. I have set out below these reports and, where possible, the accompanying minutes of the meetings in which these reports were presented. In addition, the process for revalidation of Incident Command was discussed at meetings of the ICPB and I have included the minutes of two meetings below.

Updates on 17 November 2015 and 16 December 2015

64. In November and December 2015, I provided an update on the implementation of a revalidation process to the Commissioners Group and CMB. Copies of my reports are exhibited to this statement (Exhibits SCH/22 and SCH/23).
65. In order to prepare the reports, I requested that GM Butler carried out research on what other Fire and Rescue Services were doing nationally to assess the competence of Incident Commanders (ranks of Station Manager upwards). The research determined how many hours of command experience Incident Commanders' in LFB gained on average in a year. This was relatively low, ranging between 1.5 hours and 5.3 hours per annum between the ranks of SM and AC. It was concluded that Incident Commanders' experience should be supplemented with additional training where they did not attend sufficient incidents to apply their command knowledge and skills. A minimum number of hours spent performing incident command per annum was recommended, that would include experience at incidents supplemented by training.
66. In the reports, a process for revalidation is proposed to include:
- a. A log of Continuous Professional Development to demonstrate the consistent application of command knowledge and skills in the workplace and a minimum number of command numbers.
 - b. A knowledge test to ensure an officer's technical and procedural knowledge is up to date and at a level appropriate for their rank; and
 - c. An incident command exercise to demonstrate that the appropriate level of command skills are maintained and that technical knowledge can be applied.
67. The November 2015 report to the Commissioners Group notes the following:
- a. There has been a reduction in the number of times officers have been required to undertake the role of incident commander. This means that the opportunity to practice the skills required for incident command under the realistic pressures of an incident have also reduced.
 - b. Previously, there has been an emphasis on gaining practice through operational incidents. However, the Future of Incident Command report has identified that, given the reduction in incidents, this is unlikely to provide enough opportunity to practice command skills and learn tactics necessary for incident command.

- c. A revalidation process is proposed to ensure that Incident Commanders are able to perform at the required level.
- 68. The December 2015 report:
 - a. Provides further details on the process for the revalidation of Incident Command.
 - b. Sets out a method providing an auditable trail of Incident Command practice and development, and encourages continuous improvement.
 - c. Recommends that the CMB agree the introduction of a formalised revalidation process to ensure that all operational officers are assessed on their command competency. An implementation timescale is set out in paragraph 93, page 16 of the December 2015 report.
 - d. Proposes that the revalidation process is implemented in two stages: the knowledge tests and incident command exercises in April 2016 and the minimum number of command hours/ CPD from April 2017. For reference, we commissioned and built an online recording system in around May 2017 for staff to log CPD and incident hours. The recording system was not live before my departure from the LFB.
- 69. In the December 2015 report, the CMB agreed the following recommendations:
 - a. A formalised incident command revalidation process;
 - b. The establishment of a cross-directorate working group by the Head of Development and Training in coloration with the Operations Directorate and the Operations Review team to progress the implementation;
 - c. Agree the implementation of the revalidation process in two phases;
 - d. Agree that the implementation of the revalidation runs as a project under the corporate governance arrangements.
- 70. A copy of the CMB meeting minutes on 16 December 2015 is exhibited to this statement (Exhibits SCH/24).

Updates on 24 February 2016

71. On 24 February 2016, I provided two further updates to the CMB on the implementation of revalidation ("**February Update I**") and the assessment of Incident Command skills for promotion ("**February Update II**"). Copies of the reports are exhibited to this statement (Exhibits SCH/25 and SCH/26). A copy of the minutes of the 24 February 2016 CMB minutes is exhibited to this statement (Exhibit SCH/27).

February Update I

72. The February Update I provides an update on the implementation of the revalidation of the Incident Command process. The report recommends the following:
- a. The use of Big Learn for knowledge tests;
 - b. The delivery of annual knowledge tests on Incident Command maintenance courses, subject to appropriate approvals;
 - c. The proposal to use maintenance courses to revalidate where appropriate;
 - d. The planned transformation of the Implementation Working Group to a Revalidation Governance Group following the conclusion of the corporate project in 2016.
73. In addition, the report notes at paragraph 19 that Babcock anticipated that the timescales for the delivery of all Incident Command training courses were brought forward, but Babcock anticipated that this may slip.

February Update II

74. The February Update II provides an update on the process for the revalidation of Incident Command to provide organisational assurance that officers are performing at the required level, and an auditable trail of Incident Command practice and development. The report recommends the following:
- a. The option to allow access to Incident Command related training and development courses applicable to the command role above the role they were currently performing;
 - b. To assess competence at the level above the command level currently operating at in readiness for promotion, thereby reducing the number of

Incident Command exercises for promotion processes required. As an interim measure there would be a decreasing number of Incident Command exercises for promotional processes accepted; and

- c. Authority for action required for the implementation of the recommendations is delegated to the Head of Development and Training.

75. To the best of my recollection, it was proposed that Incident Commanders should be able to access courses for the Incident Command level above theirs so that they could become familiar with training for higher levels prior to attending a promotion assessment. Previously, the first time Incident Commanders would practice attending an incident at a higher level was often during the promotion assessment. Only 25% of candidates at SM and GM level, rising to 36% at DAC level, were passing their Incident Command assessment during the Incident Command process, suggesting that there was a clear need for further training before their promotional assessment.

Update on 8 June 2016

76. On 8 June 2016, I updated the CMB on the revalidation of the Incident Command process. A copy of the report is exhibited to this statement (Exhibit SCH/28). A copy of the minutes of the CMB meeting on 08 June 2016 is exhibited to this statement (Exhibit SCH/29).
77. The report notes the following:
- a. The Revalidation of Incident Command working group (consisting of representatives from Development and Training, ORT, Central Operations, Operational Policy and Information Management) has been meeting regularly and enjoyed good engagement from senior stakeholders.
 - b. Whilst all milestones are currently on track, it is noted that the proposed timeframes may change depending on the “*incident command course review machinery*”.
 - c. It is proposed that the revalidation is introduced initially to DAC and AC ranks, with other roles following as the revised Incident Command maintenance courses are launched.
78. The revalidation activity was recorded as a project. A copy of the SDAI paper is exhibited to this statement (Exhibit SCH/30). The SDAI paper notes the following:

- a. The evidence/ information to indicate the potential impacts are the CFOA report, "The Future of Incident Command" and the National Operational Guidance for Incident Command.
- b. Changes associated with the revalidation process will be implemented through a cross-directorate implementation working group, ensuring that all potential negative or positive impacts are fully considered prior to a change being introduced.

Update on 1 September 2016

- 79. On 1 September 2016, I provided a further update to the CMB on the implementation of the revalidation of Incident Command competence. A copy of the report is exhibited to this statement (Exhibit SCH/31). A copy of the minutes of the CMB meeting on 1 September 2016 is exhibited to this statement (Exhibit SCH/32).
- 80. The report sets out three areas of "significant progress", including:
 - a. Knowledge Test question sets have been developed for all Levels of Incident Command (Level 1 - 4). The knowledge test is currently being piloted using Big Learning system.
 - b. Stretch objectives for each level of command are currently being scoped by the implementation working group, and will be fed into the incident command course review prior to the development of level 2 and above scenarios.
 - c. A draft policy for the Revalidation of Incident Command is attached. The policy has been through a peer consultation and a Heads of Service consultation process with feedback being positive. It is noted that the final draft is presented.
- 81. A copy of the draft policy is exhibited to this statement (Exhibit SCH/33).
- 82. The draft policy notes that a mark of below 50% or a failure of a retest will result in a referral to the Incident Command Development Panel ("ICDP"). It was proposed that the ICDP would consist of representatives from Operations, Development and Training, ORT and Human Resources. The role of the ICDP is to provide an additional level of support and scrutiny in assisting individuals to reach the required standard. The methods of intervention available to the ICDP include:
 - a. Incident command courses;

- b. Intensive development plans;
 - c. Operational monitoring options; and
 - d. Operational shadowing options.
83. As a final resort, Incident Commanders could be removed from operational duties if it was deemed that they present a serious safety risk. However, this decision would be referred to a Director or their nominated Deputy in light of recommendations of the panel.

Update on 10 January 2017

84. On 10 January 2017, I drafted a further update on revalidation of Incident Command. A copy of the report is exhibited to this statement (Exhibit SCH/34). To the best of my recollection, this was provided to the Commissioners Group (a less formal meeting that happens in between CMB meetings. Minutes are not taken of these meetings).
85. The report notes the following:
- a. the draft policy note is being amended to reflect a greater focus on using the “assessable” elements as an opportunity to form the basis of a Training Needs Analysis for the commander to focus personal training.
 - b. the implementation process is dependent on Babcock’s timescales and ability to develop and deliver revised Incident Command Maintenance courses. It is noted that these are being developed as part of the Incident Command Training review and are estimated to be available to pilot by April 2017 (although this may be ambitious).
 - c. The report recognises that the revalidation element was applied retrospectively to the current Principle Officer Exercise as a pilot, and several challenges were identified with the current format of the Exercise which will be fed into the review.
86. The report also notes that a library of tactical decision exercises (“TDEs”) has been established, with an initial suite of 10 TDEs developed by the North West Area. TDEs are based on operational scenarios that can be run as a desktop exercise or on a command unit using role players. The Future of Incident Command report recognised that whilst TDEs do not provide an opportunity to practice all of the command

exercises; they provide a useful opportunity to share learning of tactics, and to supplement some of the knowledge of incidents that has been lost due to the decline in operational experience. I commissioned a database of TDEs to be developed to support the additional hours and CPD for commanders.

ICPB meeting on 23 February 2017

87. As set out in a number of the ICPB meeting minutes in section A (Training) above, revalidation was a discussion point at a number of the ICPB meetings with Babcock previously. In a meeting of the ICPB on 23 February 2017, I raised my concerns that the implementation of a revalidation process was being pushed back further. Cara Kelly (Babcock) explained that revalidation requirements will need to be detailed in TCAPs in order that Babcock commence work on introducing revalidation. At the meeting, a number of different delivery methods for revalidation assessments were also discussed, however, an agreement was not reached. A copy of the meeting minutes is exhibited to this statement (Exhibit SCH/35). Section 6 of the meeting minutes contains action points for which I was responsible. I have provided an update on each action point below:

- a. *“SCH to confirm the requirements so that PD can submit a TCAP to Babcock to recover the revalidation training requirements”:*
- b. *“SCH to discuss these considerations with Steve Apter and directors and feed this information into a TCAP”:*
- c. *“SCH to arrange a meeting with DACs and ACs and invite Babcock to present the level 3&4 proposals”:*

I have provided an update on these action points in relation to the ICPB meeting on 22 August 2017 (see paragraph 90 below).

Update in March 2017

88. In March 2017, a briefing note to explain the current position of the revalidation of Incident Command implementation. A copy of the briefing note is exhibited to this statement (Exhibit SCH/36).

89. In summary, the briefing note states the following:

- a. The Revalidation policy was shared with representative bodies and content agreed in the third quarter of 2016/17. The next step was to formally consider it at the Brigade Joint Chair Health Safety and Welfare Committee, prior to its publication. A paper on the governance of assessors has been agreed with Central Ops to create a robust and sustainable assessment process involving a yearly appraisal process that will encompass feedback taken from the assessment.
- b. Knowledge tests that place the individual at the scene of a range of incident types have been designed and quality assured ready for piloting.
- c. TCAPs had been submitted to Personal Development for the assessment element of revalidation, which included training requests for levels 1-3.
- d. The CPD log system in the format of a web based application has been designed and presented. CPD logs will provide a platform to collect information directly from an Incident Commander and will include a dashboard display to track logged hours.

ICPB TCAP review meeting on 22 August 2017

90. At the ICPB TCAP review meeting on 22 August 2017, it was noted that the TCAPs for the revalidation process were almost ready to be submitted formally to Babcock. In addition, it was also confirmed that a stakeholder group for Levels 3 and 4 training would be established with Steve Apter as the sponsor, assisted by AC Mills and me. I would extend the consultation beyond the group and then feedback information. A copy of the meeting minutes is exhibited to this statement (Exhibit SCH/37).

Status of revalidation process

91. The development of the training by Babcock had not progressed to the point at which we could implement a revalidation process at the time at which I left the LFB, and so I handed over the responsibility for the process to my successor DAC Peter Critchell. As I am no longer employed by the LFB, I am unable to speak to the status of the implementation of a revalidation process.

Further involvement in Incident Command initiatives in 2017

92. As set out above, I moved to become DAC of ORT in June 2017. Following the fire at Grenfell Tower, the LFB focussed on addressing the challenges identified by the fire,

and this took primacy over planned activities and ongoing Incident Command initiatives. In November 2017 I was seconded to the Inspectorate and ceased to be responsible, or involved in, any LFB activities. Peter Critchell succeeded me as DAC in the ORT team.


Use in evidence

93. I am content for this statement to be disclosed to the GTI for use in evidence.

Statement of truth

94. I believe that the facts stated in this witness statement are true. I confirm that I am willing for the statement to form part of the evidence before the GTI and to be published on the GTI's website, save for any redactions applied by the GTI.

SIGNED by SABRINA COHEN-HATTON

A handwritten signature in black ink, appearing to read 'S Cohen-Hatton', enclosed within a simple oval border.

Date: 14 May 2020