London Safety Plan (2017)

Summary
The London Safety Plan is the Authority’s Integrated Risk Management Plan (IRMP) as required by the government’s national framework for the fire and rescue service. The Authority approved a draft version of the London Safety Plan (2017) for public consultation on 24 November 2016 (FEP2678). Proposals contained within the draft Plan cover the period from 1 April 2017 through to 31 March 2021.

Consultation commenced on 5 December 2016 and closed on 30 January 2017. This report considers the results of consultation, outlines responses to the key points and themes raised during consultation and presents the final amended version of the Plan for approval.

Recommendations
That the Authority:


2. Agrees, subject to approval of (1) above, that the Commissioner be authorised to take such action as she considers necessary to publish and implement the Plan.
Background
1. The Authority has produced an integrated risk management plan (IRMP) since 2004 reflecting government expectations to show how the Authority is managing risk to the community, and how it proposes to deliver its services to address those risks. The London Safety Plan is the Authority’s Integrated Risk Management Plan (IRMP) as required by the government’s national framework for the fire and rescue service. The current Plan (Fifth London Safety Plan – LSP5) was extended in December 2015 (FEP2520) until such time as a new London Safety Plan is approved by the Authority.

2. On 24 November 2016, a draft version of a new Plan, covering a four year period (2017-2021), was presented to the Authority (FEP2678) and the Authority agreed the draft should be the subject of consultation.

3. This report provides an update on the communication, consultation and engagement activity on the draft Plan. It sets out the results of consultation and the themes which arose during consultation, providing a response to the points raised through that consultation. Some amendments to the draft Plan are proposed and a revised version of the Plan is at Appendix 1 to this report.

Statutory background
4. The Fire and Rescue Services Act 2004 (FRSA), among other things, requires the Secretary of State to publish a national framework for the fire and rescue service, and to review and update that framework regularly. The national framework sets out the government’s expectation for the service and the Authority must ‘have regard’ to its contents when planning and delivering its services.

5. The current national framework was published in July 2012. Unlike previous frameworks, no specific time period of currency for an IRMP is stated. In particular, the framework says that “Each fire and rescue authority must produce an integrated risk management plan that identifies and assesses all foreseeable fire and rescue related risks that could affect its community, including those of a cross-border, multi-authority and/or national nature. The plan must have regard to the Community Risk Registers produced by Local Resilience Forums and any other local risk analyses as appropriate.”

6. In addition, the priorities in the national framework are for fire and rescue authorities to:
   - make provision for prevention and protection activities and respond to incidents appropriately;
   - work in partnership with their communities and a wide range of partners locally and nationally to deliver their service; and
   - be accountable to communities for the service they provide.

Development of the Plan
7. The process for the development of the Plan was set out when the draft Plan was reported in November 2016. An inclusive approach was taken to develop the draft which included engaging with Members, senior managers, staff, staff side representatives and staff support groups. This inclusive approach has continued during and after the consultation phase to engage the widest possible audience with the Plan.
Incorporating the outcome of the Mayoral independent reviews

8. The outcomes of the Mayoral independent reviews conducted by Anthony Mayer CBE, and Lord Toby Harris were also outlined in the covering report to the draft Plan (report FEP2678). The report highlighted that both reviews had been accounted for in the drafting of the Plan. This was accompanied by a more detailed report (FEP2679) at the November 2016 meeting of the Authority, and a further report in January 2017 (FEP2695) demonstrating how the Brigade is intending to address the recommendations, both via the London Safety Plan and through other corporate projects/actions.

Communication and consultation on the draft London Safety Plan

9. The consultation on the draft London Safety Plan 2017 started on Monday 5 December 2016 and ran through to Monday 30 January 2017 – a period of eight weeks as agreed by the Authority (FEP2678).

10. The consultation was delivered primarily though a questionnaire hosted on the Talk London website, which is City Hall’s online community of 31,000 Londoners. This was signposted from the home page of the LFB website, social media accounts and all other publicity, including media stories, posters and direct emails. Additionally, a dedicated email address, freephone line and freepost address were set up to allow people to contact LFB about the consultation and request hard copies of the consultation questionnaire to be posted to them. This was set up specifically in consideration of people who have less access to the internet. Consultation responses in the form of letters and emails were also received and taken into account.

Consultation documentation

12. A consultation questionnaire was hosted on the Talk London website and was also promoted by Talk London with direct emails to their members.

13. Hard copies of the consultation document and relevant appendices were sent to anyone who requested the consultation material in this format via the freephone number or consultation mailbox. Hard copies were also available at the ‘drop-in’ sessions.

Drop in sessions

14. The Authority agreed seven ‘drop-in’ sessions should be held during the consultation period at five fire stations (one in each of the four LFB area and one in central London), plus one at the ‘pop-up’ LFB Museum in Lambeth and one at City Hall. The time, date and location of these sessions was published via the LFB website and shared locally via direct emails from LFB Borough Commanders, with posters advertising the sessions distributed locally. The sessions were promoted on social media, including the LFB’s 135,000 followers and Facebook event pages were set up which allowed people to help share and ask questions on what they were looking forward to seeing at the fire station. Interest in the open days was also tracked by using an event registration site called Eventbrite that allowed people to register (though not compulsory). The LFB press team contacted local journalists so that the meetings could be incorporated into news pieces regarding the consultation.
15. The consultation 'drop-in' sessions at fire stations were arranged with Borough Commanders and fire station staff. The stations also ran a range of different activities similar to those used at station and 150th anniversary open days in order to help the sessions appeal to local communities. A consultation element was then also present at each event which included staff from different departments being in attendance to answer any London Safety Plan questions and to talk about the Plan. Copies of the Plan and consultation form were available, together with videos about the main elements of the consultation, tablet-based presentation which people could use to sign-up to a mailing list to follow the consultation and to view or use the LFB postcode (assessment of local risk) tool developed for pre-consultation LSP engagement. Alongside this, the representatives from the Brigade’s fire safety team were also present to provide community safety advice and to distribute smoke alarms.

16. The 'drop-in' sessions took place as follows, in date order:

- Wednesday, 14 December 2016 Pop-up Museum 1400 till 1600
- Thursday, 15 December Surbiton Fire Station 1600 to 1900
- Monday, 19 December Leytonstone Fire Station 1600 to 1900
- Monday, 9 January 2017 City Hall 1400 to 1600
- Tuesday, 10 January Soho Fire Station 1600 to 1800
- Wednesday, 11 January Croydon Fire Station 1600 to 1900
- Monday, 16 January Tottenham Fire Station 1300 to 1600

17. Attendance was good with 224 members of the public plus Fire Brigades Union (FBU) representatives, Members from local councils or London Assembly, and press/media representatives. Appendix 2 includes notes of the issues raised at each of the meetings.

18. Following a request passed from local FBU representatives, an additional meeting was arranged at Kingston Fire Station largely about the proposal to move the second appliance from Kingston to New Malden fire station. This was held on Thursday 19 January and around 40 people attended including local residents, representatives from Ham House National Trust and several local politicians, plus FBU representatives. A presentation specifically on the move of the appliance was given by the Head of Strategy and Inclusion and there was an opportunity for
questions on the plans. Although scheduled for an hour, the meeting lasted for two hours because of the number of questions and issues raised.

Online meetings
19. Using lessons from the consultation on the Budget 2016/17, an online meeting was hosted via the LFB website to replicate a physical public meeting on 23 January 2017. The online discussion was designed for people who wanted to have their say, or get more information, but couldn’t get to a physical meeting to ask their questions. The London Fire Commissioner and Chair of the Authority took part in the online meeting, answering questions on the consultation. The LFB website page hosting the discussion received 491 unique views.

20. For the first time, Facebook Live was used to broadcast an interview in which the Commissioner talked about the draft LSP to encourage people to take part in the consultation. This received 8,966 views in total.

21. For more details on both of these online meetings see Appendix 2.

Internal communications
22. The aim of internal communications was to ensure staff understood the broad content of the Plan, the timelines involved, to direct staff to the consultation and encourage them to take part. All of our internal communication tools were used including Hotwire, Shout, Update, Commissioner’s Blog, Early Bird briefings (for HQ staff) and the Borough Commanders’ communication sessions.

Letters and direct emails
23. On the day the consultation launched, direct emails were sent from the Commissioner to London MPs, MEPs, London Assembly Members, and Chief Executives and Leaders of every London borough, as well as Chief Executives of other emergency services in London and neighbouring brigades. Emails were also sent from the Commissioner to key public bodies including the Association of British Insurers, London Councils, London First, Transport for London and NHS England.

24. Email notifications about the consultation were sent from the consultation team to members of the public who had previously requested to be kept informed following the consultation on the operational changes for budget 2016/17.

25. Borough Commanders emailed their local contacts to encourage them to take part in the consultation, and to help publicise the consultation and public meetings to wider public audiences.

26. In the final week of the consultation, all stakeholders who had been contacted at the launch of the consultation were emailed again to remind them the consultation was about to close and encouraging people to respond.

27. Throughout the consultation Talk London also sent emails periodically encouraging participation in the survey, including a final reminder just before the consultation closed.
Publicising the consultation

28. As well as the direct contact made with stakeholders and on the drop in sessions, an extensive programme of publicity for the consultation and of the ‘drop-in’ sessions was undertaken. This activity ran continuously throughout the consultation period as well as specific peaks of activity around the ‘drop-in’ sessions, the launch of specific content (e.g. videos) and in the final week before the end of the consultation. This included:

- Media releases
- Promotion on Twitter (135,000 followers) and Facebook (over 72,000 followers)
- Briefings for officers speaking to the media on other issues to also push the draft LSP – e.g. during interviews on the flooding events in early December 2016 and in the previous Commissioner’s farewell interviews and the new Commissioner’s initial interviews

29. Media coverage included The Evening Standard, LBC, BBC Radio 5 Live and numerous local newspapers. Full details of are set out in Appendix 2.

30. Requests were also sent to all London council communications teams to promote the consultation on websites and social media channels. London Councils also promoted the consultation through their weekly email newsletter and the GLA and Mayor’s social media channels also promoted the consultation and encouraged participation.
Review of the progress of consultation

31. Mid way through the consultation period there was a review by officers of the responses received (in terms of origin of responses rather than content) using the demographic information the consultation collected. This suggested that there were some groups that were under-represented in the people who had responded so far: women, Black, Asian and Minority Ethnic (BAME) and people with disabilities. It also highlighted a number of London boroughs where levels of response were disproportionately low – specifically, for example, responses from Kingston borough where the Plan proposed moving the second pump from Kingston to New Malden fire station.

32. To improve the responses from under-represented groups, a ‘paid for’ Facebook advertising campaign was put in place to target those specific groups with tailored messaging and bespoke video content to encourage the audience take part in the consultation. This had the direct result of driving people to the Talk London consultation page which saw these results:

- 1,220 click throughs\(^1\) from women adverts
- 3,612 click throughs from BAME adverts
- 499 click throughs from disability adverts

33. In addition, press/media work for the final weeks of the consultation was focussed on the underrepresented groups, with a press release going out alongside video content featuring the Commissioner calling for more women and minority groups to take part.

34. To increase the level of participation from specific boroughs, the social media strategy was changed to reference the names of the underrepresented boroughs in tweets. This had proved to be a successful tactic in previous work with the Twitter platform and was done in-house. Overall there was a much more even spread of participation from different boroughs in the final data – with Kingston moving from 12 responses at the midway point to over 80 by the time the consultation closed.

35. At the midway review, only 20 people taking part in the consultation had identified themselves as staff. A concerted effort was made to make sure staff understood that the consultation was as much for them as for the public using more direct messaging from the Commissioner on her Blog

\(^1\) the number of visitors to a web page (Facebook) who follow a hypertext link to a particular website (Talk London)
and a video interview posted on Hotwire. This saw an increase to 162 by the time the consultation closed.

Providing feedback to consultation respondents
36. Everyone who sent a response to the consultation and provided contact details, either email or postal address, received an acknowledgement of receipt of their consultation response. The same group will be contacted to let them know the outcome of the consultation.

Cost of consultation
37. The cost of the consultation is set out in the table below.

<table>
<thead>
<tr>
<th>Consultation elements</th>
<th>Cost (£) excl. VAT</th>
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<tbody>
<tr>
<td>Drop in sessions, including giveaways and equipment (e.g. iPads)</td>
<td>£1,854</td>
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<tr>
<td>Advertising (all costs including agency fee and paid for social media)</td>
<td>£1,920</td>
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<tr>
<td>Freephone line</td>
<td>£30</td>
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<tr>
<td>Printing of consultation documentation</td>
<td>£665</td>
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<tr>
<td>Consultation analysis (Tonic)</td>
<td>£9,995</td>
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<tr>
<td><strong>TOTAL</strong></td>
<td><strong>£14,493</strong></td>
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Petitions
38. One petition with 144 signatures was received which opposed the proposed move of the second fire engine from Kingston to New Malden fire station. The petition said "are: “We, the undersigned, call on the London 2017 Fire Brigade to keep both fire appliances at Kingston Fire Station. If New Malden needs better fire emergency cover it is not acceptable to provide this by reducing the fire cover in Ham, Petersham and Kingston and reducing the safety of our community. “

The response to consultation
39. The consultation resulted in 1,968 responses comprising:
   - 1,874 responses from individuals via the online survey
   - 94 responses by paper copy of the response form, hard copy letter, or email.

40. Of those responding online:
   - 1,498 were members of the public (76 per cent)
   - 162 were staff of the London Fire Brigade (LFB) staff (8 per cent)
   - 9 were elected members (0.5 per cent)
   - 32 responded on behalf of an organisation (1.6 per cent)
   - 267 respondents who entered their respondent type as "other", preferred not to say, or gave no answer (13 per cent)
41. The designation of responders is self-defined. For example, a member of staff could define themselves as a member of public or a member of staff. People could select to respond on behalf of an organisation although these may not have been formal responses from the organisation.

42. The majority of respondents were male (57 per cent) just over a third female (35 per cent), the others gave no answer or preferred not to say (17 per cent). This split between men/women is similar to that found with those using the Brigade’s social media opportunities where on Twitter, 63 per cent of the Brigade’s followers are men and 37 per cent are women. Similarly, on Facebook 64 per cent of the Brigade’s followers are men and 35 per cent are women.

43. 10 per cent of respondents reported some form of disability, and this is lower than the percentage of working age adults with a disability in London (16 per cent).

44. 10.4 per cent of respondents were BAME, compared to 42.57 per cent of the population in London. The largest number of respondents by far identified as White British, at 67 per cent. This compares to a White British population in London at around 57 per cent.

45. The following ten London borough councils submitted responses:
   - Barking & Dagenham
   - Bexley
   - Camden
   - Greenwich
   - Havering
   - Hillingdon
   - Islington
   - Lambeth
   - Kensington and Chelsea.
   - Sutton

46. As did these Brigade Trades Unions:
   - FBU
   - Unison
   - GMB

47. An external company, Tonic, was employed to provide an independent analysis of the responses. They looked at all 1,968 consultation responses submitted via Talk London and in hard copy. The Tonic analysis report is available as Appendix 3.

Lessons learned from consultation
48. Response levels to this consultation were good, at 1,968 respondents, compared to 1,478 people who responded to the consultation held over a similar period last year on the Budget 2016/17 which included proposals to permanently remove 13 fire engines from service. It could be surmised that this higher participation rate on topics which were notably less contentious was down to using Talk London to host the survey which allowed the Authority to access a significant community of interested Londoners. This is positive and reflects the benefits of using Talk London to get wider participation in consultations (at reduced cost). It is notable that response levels from staff were lower, with 162 staff (8 per cent of respondents) taking part in
this consultation compared to 328 staff (22 per cent of respondents) last year; anecdotal evidence suggests that this may be because staff were less concerned about the proposals in the draft LSP this time.

49. This consultation again showed the benefit of reviewing the demographics of respondents part-way through the process to enable targeting later communications to achieve a more representative response. The benefits of using video and new platforms such as Facebook Live were also shown by the number of people who were reached using these tools.

Consultation outcomes
50. In considering the views of respondents on the draft Plan, officers have taken into account:

- The answers to consultation questions
- Any comments supplied in support of those responses
- The comments in other written (letter/email) responses
- The issues arising at the drop in sessions

51. In the sections which follow there is a general overview outlining the preferred options from the questionnaire responses, followed by the key themes highlighted by respondents under those options, along with a response to those points.

Comments on the Plan overall
52. There were 369 (19 per cent) respondents who took the opportunity to make a comment on the Plan overall. The comments tend to be a ‘mixed bag’. There is support and gratitude for being invited to take part in the consultation and for the content of the Plan, combined with general support for what the Brigade does. This is set against an overhanging concern over perceived further budget cuts, and the feeling that the Plan is too long and complex.

53. 55 respondents pointed towards the Plan being accessible, clearly showing the way forward, and being well thought out. Given the efforts by officers to make the development of the Plan a more inclusive process, it is particularly gratifying to note one staff comment in particular, "Being an LFB employee, this plan feels more reasonable and caring than previous plans....".

54. 52 respondents reiterated their support for the Brigade in general and the challenging role that firefighters have. It is clear that the Brigade is still held in high regard by many members of the public, “The Fire Brigade offer a fantastic service....A big thank you for keeping us safe” reflects the sentiment of many of the comments here.

55. However, some respondents (43) were still concerned about budget cuts in the future, and a general concern that the Plan remains "entirely cost-driven". There is also concern over the proposed expanded role for firefighters (as proposed in the Plan) and uncertainty over whether these extra responsibilities would have to be funded from the existing budget. Naturally, the Plan has been written with the Brigade’s budget in mind. However, officers would like to assure these respondents that the aspirations in the draft Plan have been written with Londoners’ safety in mind.

56. Finally, a small number of respondents (14) felt that the Plan was too long and complex to understand for someone who might not be familiar with the fire and rescue service. There were some requests for an abridged version or an “executive summary”. The Brigade recognises these concerns and there are separate proposals to develop one page summaries, potentially for a range of audiences (e.g. staff, public, partner organisations, etc.) to emphasise the key messages
in the Plan in order to keep it as a ‘live’ document over the next four years. This is especially important for staff given the relatively low number of respondents (162) and the intention that the Plan should be owned by the staff who are set to deliver it. An easy-read version of the Plan will also be created and made available on the website.

Firefighters’ role in the community
57. Respondents supported the Plan’s proposals to expand the firefighters’ role in the community, with a total of 50 per cent (968 responses) either strongly agreeing or tending to agree. This is set against 38 per cent (737 responses) either having a tendency to disagree or strongly disagreeing. The support for this proposal wasn’t as firm as other proposals, and this is likely to be as a result of an ‘endowment’ effect seen in the consultation responses for previous London Safety Plans – i.e. the preference to keep the service the same as is currently provided.

58. Where respondents provided an answer as to what specific activities they felt firefighters could contribute to, school visits featured highly, with an emphasis on educating young people on fire safety and prevention, and the consequences of starting fires. Youth liaison work also featured with a perception that firefighters were looked up to by young people. It is also interesting to note that there was a belief that such activity isn’t taking place even though the Brigade carries out a significant number of school visits (over 900 in 2015/16 targeting over 85,000 pupils) and has dedicated youth programmes such as Fire Cadets and the LIFE (Local Intervention Fire Education) scheme (63 LIFE scheme courses were conducted during 2015/16).

59. Other suggestions centred on fire prevention and safety advice, checking alarms, fire detectors and means of escape, assisting the elderly, road safety and contributing to fire safety. Officers will take these suggestions forward as part of the Brigade’s planned prevention and protection work.
**Issue raised**

Firefighters already do enough; their primary role should be to fight fires, and other necessary tasks. Firefighters do not have a remit or qualifications to take on broader community outreach roles.

**Response**

This issue has been raised in previous consultations. It is clear that some respondents believe that firefighters are at full capacity already and are concerned that additional responsibilities would impact on their ability to respond in an emergency. There are other respondents, who are aware that staff spend a low percentage of their time at incidents, but who nevertheless would wish them to be dedicated to the response role to ensure their immediate availability.

From work conducted previously, the Brigade knows that fire engine crews are occupied, on average, around 7 per cent of the time at emergency incidents. The busiest fire engine in London (at Euston) is occupied 16 per cent of the time; at or going to and from incidents. In addition, staff spend time training, learning new skills, offering fire safety advice to local residents and businesses and familiarising themselves with any local complex buildings so they can fight any fires that happen safely and efficiently. However, we know that there is capacity to do more, and given the position of trust that firefighters hold with their local communities, we believe there is much more our crews can do, not just on fire safety, but with a wider objective to help people feel safer in London generally. This is why the Plan has aspirational objectives regarding fire safe and well visits, emergency medical response, and collaborative working with partners (amongst others) to provide London with the fire service that it deserves. There is a need to balance this with available capacity, and officers will keep this under review to ensure that the service is still operating effectively.

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**Opening up fire stations**

60. The consultation prompted respondents to tell us what other things they would like to see fire station spaces used for, and there were 767 responses (39 per cent) to this question. As with the firefighters in the community question, of the 767 responses, 89 (11.6 per cent) related to keeping fire stations as they are currently, and that fire stations should be used solely as fire stations. There were concerns about safety and security, and how opening up the space may impact on efficiency of the station. This was combined with a general feeling that there are already enough alternative spaces in the community such as dedicated centres for health services, social groups, etc. Some also questioned the suitability of fire stations for any other purpose.

61. However, there were also 378 responses out of 767 (49.4 per cent) where ideas were submitted for other things fire station spaces could also be used for. Once again, youth outreach suggestions were the biggest theme here (68 respondents), with a perception that as well as fire safety and prevention, training courses teaching young people about the dangers of crime, arson, unsafe driving and anti-social behaviour would be beneficial. This was also combined with suggestions that fire station space should be opened up to youth clubs, sports and exercise groups. The belief that firefighters are role models also featured: “I think firefighters are great role models and it would be nice for disadvantaged people to have a goal, whether it’s joining the fire brigade or just getting fitter.”
62. Exercise and fitness classes also featured prominently as a theme in the next largest group (58). Given the role of the firefighter and the need to stay fit, some felt that by emulating the firefighter, this could be both fun as well as educational.

63. Open days, spaces for meetings, activities for children all featured in respondents’ answers. Social care also featured as a theme, with some respondents (24) suggesting that fire station spaces could be opened up to provide for London’s homelessness population, especially during winter, by providing shelter at night, and warm spaces. The Brigade opened its doors on Christmas Day at six fire stations working in partnership with the Co-Op to provide dinner for over 100 most vulnerable members of the community, and officers would like to explore further opportunities to help those most at risk.

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<th>Issue raised</th>
<th>Response</th>
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<tr>
<td>Fire stations should remain purely as fire stations; safety and security could be compromised; concern over suitability of fire station spaces for anything else</td>
<td>Many fire stations are already used by the community and those built over the last few years are specifically designed with community use in mind. This provides an opportunity to share our safety messages more widely. Some of the older fire stations can be inaccessible to the public and this creates a physical barrier to community engagement. This can create a perception that fire stations are not very welcoming places for the public. The Brigade would like to explore how to open up fire station spaces safely, to encourage the community to engage with its firefighters, and events in the community generally, building a strong sense of local wellbeing and support. Officers believe that this can be done without compromising the efficient operation or security of the station.</td>
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Collaborating with other emergency services
64. Collaborating with other emergency services emerged as one of the strongest supported areas of the draft Plan with 1,614 respondents (86 per cent) agreeing with the proposals. Support tended to be general without specific indications of where collaboration efforts should be focussed, rather most acknowledged “it seems like a good idea.” Some respondents (62) were a little more cautious in their support, still accepting it was a good idea but concerned that it could lead to a degradation of services and that emergency services need to be “properly funded and staffed.” Other respondents (32) had a definite preference for sharing facilities, but not roles, and a smaller number (21) who were generally opposed to it.

65. There was also a preference to work more closely with the London Ambulance Service (46 respondents) and that sharing of buildings, facilities and equipment was a logical step forward. A few respondents (11) also pointed towards suitably trained firefighters acting as paramedics. However, the same sentiment did not extend to the police, with 21 respondents saying that LFB should not join with the police. This was also echoed by the Fire Brigades Union. There are concerns about the differences between the way in which the two organisations are seen by the public and that closer working could erode trust in the fire service.

66. Other respondents (13) felt that information sharing should be a core priority for collaboration, especially with regard to the NHS and mental health services to identify at risk individuals, even going so far as to say there should be a standard operating practice. Some respondents (13) also felt that collaboration could improve the financial situation for the Brigade.
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<td>The fire service should not join with the police</td>
<td>The Police and Crime Act places a statutory duty on the three emergency services to consider opportunities to collaborate. However, there is no intention in London that the police will 'join' with the fire service. LFB already works with the Metropolitan Police Service as an emergency partner, and with the joint statement of intent and the blue light collaboration team now established, work is underway to progress potential areas of collaboration. The joint statement points towards control rooms, prevention and response activities, support functions, inclusion and infrastructure as areas worthy of exploration. The Brigade understands the importance and impact of LFB’s good reputation in the community, and works hard to maintain this. Working with the police should not compromise this, and with a statutory duty, there are a number of areas where officers believe we can work effectively to help each service meet objectives, whether that is fire related, crime reduction or more generally to make London the safest global city. Additionally, the Brigade would like to add attending ‘persons collapsed behind locked doors’ incidents to collaboration proposals. These are currently attended by the police, and there are approximately 8,000 incidents in London per year. Officers feel that the Brigade can make a real difference here and has more sophisticated access equipment which will facilitate better outcomes for the people who have collapsed.</td>
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**Speed of response – backstop target**

67. Respondents were largely in support of changing the 'backstop' measure to get at least one fire engine to an emergency incident anywhere in London inside 10 minutes on 90 per cent of occasions, with 1,173 (64 per cent) in favour. However, there was some confusion as to whether changing the current target of getting at least one fire engine to an emergency incident inside 12 minutes on 95 per cent of occasions, to 90 per cent in 10 minutes, actually represented an improvement. Some respondents (100) had concerns over reducing the percentage time and others (70) felt that there was not enough information to be able to make an informed opinion.

68. There was also a concern from some respondents (57) that the change was being proposed merely as a bureaucratic exercise, that a change was not needed (35), and it could add unnecessary stress to firefighters responding to incidents (23).

69. Some respondents (72) also used this question to repeat concerns about fire station closures and fire engine reductions that have occurred over the past few years. These respondents felt that response times could not be expected to improve given the levels of reductions that have already taken place. This came through in consultation about the previous Plan and the subsequent budget proposals for 2016/17, and remains an area of concern.

70. One of the issues arising from this consultation question that came out both from the 'drop-in' sessions and from 89 respondents in the consultation was the perceived problems with traffic calming measures, cycle lanes, one-way systems, and congestion. This led one respondent to
assert that “unless hard decisions are made to reduce congestion, I fear that any response time targets will be mere aspiration.”

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<tr>
<td>Concerns over reducing the percentage the target time is met/not enough information available to make an informed decision</td>
<td>The Brigade recognises that the change is a complicated one to understand and the improvements may appear to be subtle (or as some respondents have stated), hard to discern without more information. To respond to these consultation concerns, we propose to introduce the new standard but will also retain the current standard (95 per cent with 12 minutes). We are open and transparent about our performance and the Brigade continues to publish London, borough and ward performance as part of our annual Statement of Assurance, and detailed data about attendance time performance in our annual Fire Facts document Incident Response Times. We also have a dedicated transparency page on the LFB web site here as well as a number of data sets on the London Data Store, including data for all incidents attended and resources mobilised with attendance times to those incidents since 2009 (and updated monthly).</td>
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<tr>
<td>Address problems with traffic and deal with new cycling schemes</td>
<td>There is a perception among some respondents that London’s traffic is getting worse and, road changes to support cycling, for example, are having an impact on the speed with which emergency vehicles can get to incidents. The Brigade works closely with local councils, and is consulted about traffic and road schemes because of any potential impact on attendance times, or access. It is, however, often difficult to predict the impact of schemes on our emergency response. For example, the Brigade has looked appliance response times in Waltham Forest which was one of three boroughs to receive TfL funding to improve cycling routes (also anecdotally known as ‘mini-Holland’ schemes). A review of attendance time performance for the borough and for the specific the postcode where the cycling scheme was implemented, does not show any impact on overall attendance times. Although crews locally may have the perception of being delayed, because of increased traffic on main roads, or having to use alternative routes, those delays appear not to be having any impact on attendance time performance and which is comfortably within the Authority’s average attendance standards. Overall London-wide attendance performance for first and second appliance is currently good and better in some areas than five years ago, despite the removal of stations and appliances, and increased traffic in London.</td>
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71. A few respondents (15) also used this section to make the case for using smaller vehicles as it is perceived these vehicles would be able to cope with traffic conditions better. The Plan already refers to exploring the possibility of making use of smaller vehicles. This will be determined by whether these vehicles can deliver a beneficial outcome for a number of operational change projects that will naturally arise from the Plan.
Moving the second fire engine from Kingston to New Malden

72. There were 1,820 respondents to this area of the consultation, with the largest response (836 – 46 per cent) in support of moving the second fire engine from Kingston Fire Station to New Malden Fire Station. This was set against 765 respondents (42 per cent) who neither agreed or disagreed with the proposal, and 219 respondents (12 per cent) who disagreed.

73. There were 435 respondents (22 per cent) who provided a reason for their response, and these responses were mixed.

74. The key themes emerging were that 82 respondents thought all stations should have at least two fire engines, and rather than removing the second fire engine from Kingston, an extra second fire engine should be allocated to New Malden. Some of the comments here also related to the closure of fire stations and removal of fire engines undertaken previously. This was balanced by a view from 75 respondents that they ‘trusted in expert opinion’ and if it was being proposed by experienced fire officers then it must be a sound recommendation. There were also 62 respondents who expressed support for the move.

75. Some respondents (58) said they were not qualified to comment and that they were not experts on the logistics of such a move. There was an assumption as with those respondents who trusted officers to make good recommendations that the proposal must be based on in-depth analysis. This was combined with a view from 44 respondents that more information on the move was required.

76. Other respondents (49) felt there were significant differences between Kingston and New Malden, with a perception that Kingston is a ‘busier’ place with large commercial and shopping centres, rather than the less populous New Malden. Other respondents (22) felt that the impact on other local areas, particularly at ward level, was not beneficial and that certain areas such as Ham, Petersham and Richmond would be negatively affected. Again, there was concern that future changes in road designs to improve cycle routes had not been taken into account.

77. The Fire Brigades Union is also opposed to the move and has provided a summary of concerns drafted by local FBU members. The Brigade’s response to the submission is provided later in this report under ‘Staff side responses’.

78. A petition with 144 signatures was also received from local residents in Kingston affected by the change. The petition was opposed to making the change. A second petition by local residents opposing the change has also been initiated since consultation closed. However, there was no official response from the Royal Borough of Kingston-upon-Thames, or the other boroughs impacted (positively and negatively) by the proposed move.
<table>
<thead>
<tr>
<th>Issue raised</th>
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<tbody>
<tr>
<td>The second fire engine should not be moved from Kingston to New Malden</td>
<td>While the move is expected to benefit greater numbers of people than it adversely affects, the Brigade notes the concerns raised by local residents who may be adversely impacted by the change. Two of the eight wards that would be negatively impacted are expected to experience a significant increase in the average time it will take a second fire engine to arrive. In Tudor ward, this increase is expected to be an average of 5mins 7secs and in Ham, Petersham and Richmond Riverside the increase is expected to be an average of 4mins 22secs. This would mean that those wards experience some of the longest attendance times for the second fire engine across London. Performance in Kingston is now better than has been historically. Second fire engine attendance performance in Kingston was within eight minutes on average in 2015/16 (at 07:44), for the first time. The second fire engine performance in Kingston in 2016/17 is likely to be much closer to the target (currently at 07:57). Whilst it will be difficult to continue to reliably deliver our second appliance London-wide target within Kingston without moving the second appliance to New Malden, given recent performance by crews, and local concerns about the move, the Brigade will delay any decision regarding moving the second fire engine at Kingston and will review this in a year’s time.</td>
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**Flood response capability**

79. The section on flood response was one of the most supported areas of the draft Plan with 1,589 respondents (89 per cent) agreeing that the Brigade should extend its flood response as outlined in the Plan. There was a concern (65 respondents) that flooding will become more prevalent in the future and that more training and funding should be made available to combat the threat (65 respondents). Some respondents (51) also agreed that preventative measures needed to be put in place and more preventative work in general.

80. A number of respondents also put forward that while the Brigade has a role to play in flood response and prevention, it is not solely responsible, and it is important that the Brigade works with and influences others to do more on this issue. 46 respondents felt that Thames Water were not doing enough to deal with floods caused by burst pipes with the recent burst water main in Islington in people’s memories: “Considering most of the recent floods in London have been caused by Thames Water, shouldn’t it respond to its own floods?”. Respondents also felt that there should be further involvement of the Environment Protection Agency (22) and that there should be more involvement in planning (20) and working with councils and property developers to prevent building projects in flood plains. Other agencies were also referenced by 13 respondents, such as the army and RNLI, who should also work with the Brigade.

81. As with other proposals in the Plan, 28 respondents also expressed caution that firefighters should not be overloaded with new responsibilities.
The Brigade has a role to undertake in flood prevention and response but so do others.

The Brigade is pleased to note the support from respondents in this important area. We also note the distinction that some respondents have made in identifying that the Brigade is not solely responsible for flood response and prevention. This is helpful as it clearly points towards a wider collaborative role and the Brigade will pursue its commitment to flood response working with and influencing others on this important issue to Londoners.

It is also important that we help Londoners understand what the threats from flooding are, and what action we will take to protect them, and other people at a national level.

Members will know that the Brigade attend three types of ‘flooding’ incident with the majority of incidents attended (about 85 per cent) to deal with water leaks within buildings (e.g. taps left running), with five per cent connected with burst water mains, and 10 per cent which are weather-related flooding. To this end, the Brigade will undertake to be more specific on what we plan to do regarding flood response and prevention, and this is likely to involve more consultation so that the Brigade continues to collect views and opinions on how and where it should operate its services.

Future Use of Fire Rescue Units (FRUs)

82. This was another strongly supported area by respondents with 1,371 (77 per cent) in agreement with the future use of FRUs proposals and the introduction of a target response time for attendance. However, in the second part of the question which asked respondents for other comments on the use of specialised FRU vehicles, it is interesting to note that there is some conflict over whether targets are a good idea or not. Of the 435 respondents who went on to provide a comment, 107 respondents felt it was not a good idea, against 59 respondents who felt that it was.

83. Once again, there were also 51 respondents who felt they needed more information, and with FRUs in particular, some respondents (30) felt that the situation was far too complex, given how there are different types of FRUs and that they are used for different types of incident. There was also a feeling that firefighters should be trusted (36 respondents) to get to incidents as quickly as possible, therefore targets are unnecessary. This was supported by a view that the proposals were politically or administrative motivated (by 15 respondents) by those who did not understand what the job entails.
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<tr>
<td>Conflict over whether there should be attendance targets or not for FRUs</td>
<td>Respondents comments show a conflict about setting attendance targets with some concern as to how they would be derived and questions over what the benefit would be. In order to move forward on this proposal, and in the light of the recommendations in the Mayer review, the Brigade will carry out further work based on the 14 FRUs that it has currently. We will start to report on London-wide attendance times for FRUs as this will help inform the position on whether there should be attendance targets, and indeed, what if any, these targets should be. The Brigade will also look at the optimising the best locations for FRUs. We will work closely with the representative bodies and the FRU staff themselves in developing any proposals.</td>
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**Charging for AFAs**

84. This was another strongly supported area of the draft Plan with 1,510 respondents (85 per cent) agreeing with proposals to change the way the London Fire Brigade charges for false calls to automatic fire alarms. Only 107 respondents (6 per cent) disagreed.

85. Analysing the supporting comments, it is apparent that some respondents have confused automatic fire alarms with 'hoax calls'. As such, there is a strong reaction among respondents here, calling for harder and more punitive measures against those who call on the services of the Brigade in this way.

86. 177 respondents felt that the threshold for charging should be lower than 10 call outs. Numbers put forward by respondents varied but these tended to be at a lower level. Some respondents (58) favoured a heavy fine for those breaching the threshold, and that fines should extend to manufacturers, installers and maintainers of alarms too. Some respondents (26) even felt that domestic homes or care homes should not be exempt from fines for repeated call outs to false automatic fire alarms.

87. However, other respondents (40) felt there should be some exemptions from charging and these included hospitals, care homes and universities. There was also a feeling that cases should be treated on an individual basis (32 respondents) and that even fines would cause danger (23 respondents) with concerns that lowering the threshold could have a "detrimental effect on fire safety....it could lead to individuals resetting or ignoring alarms."
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<tr>
<td>Threshold for charging should be lower than 10</td>
<td>When the policy to charge for automatic false alarm call outs at a threshold of 10 or more was introduced as part of the previous London Safety Plan, the intention was to change behaviours and to lower the number of false automatic fire alarms that the Brigade was being called to. It was never the intention, nor is the Brigade able to make profit from charging, we can only recover costs. However, officers believe the introduction of the charge has reduced the number of unnecessary calls. Officers recognise the importance of also working with businesses and institutions to educate responsible owners on the importance of fire safety and the need for appropriately maintained automatic fire systems. This approach supports the Mayor’s priority to be the most pro-business Mayor yet, and is a more progressive approach. However, the Brigade believes that charging for repeated attendances is a valuable measure in our work to reduce the number of these calls and encourage more effective fire safety. The Brigade will review the threshold for when a charge is made in order to maintain a balanced approach and will reserve the right to charge on a case by case basis, recognising the concern raised by respondents. This will be supported by an updated policy which will make it clear when a charge will be applied, and when it will not.</td>
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**Headline targets**

88. There was strong support for the proposed headline targets in the draft Plan with 1,322 respondents agreeing that they were the right ones for the Brigade to focus on. Where comments were provided by respondents (346) to further qualify their opinion, some respondents (43) wanted more certainty around the targets and that they lacked specificity in some of the wording and figures. There was also a feeling that some of the targets read more as admirable aspirations rather than targets.

89. Some respondents (43) used the question as another opportunity to express concern over the change in the backstop speed of response target proposal to 90 per cent in 10 minutes, and there were 29 respondents who once again had a general disagreement with targets overall. A few respondents (10) also questioned how targets would be achieved, again with a reference to recent station closures and fire engine removals.

90. Similar themes as earlier were also seen about broadening home fire safety visits to ‘safe and well visits’, and a concern that firefighters should not be expanding their role (27 respondents). Others (18) also felt it was impossible for the Brigade to achieve a lower rate than the national average for primary fires in London.
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<td>Some disagreement with targets; concern that targets are not SMART</td>
<td>The Brigade acknowledges the potential limitations with setting targets, but officers believe they support transparency of the organisation’s effectiveness and enable the public to see how we are performing. Notwithstanding that there are a few respondents who object to any targets, it is pleasing to note that the majority of respondents agree with the targets and the priority areas for the Brigade to focus on over the next few years. We acknowledge that not all targets were specified in the draft but where appropriate, they have now been defined for the final version of the Plan. The Brigade is also seeking to include some qualitative targets as part of its internal facing measures to gauge whether the organisation is behaving and operating in line with our principles and a behavioural framework that is currently under development. This follows the renewed ‘people’ focus of the Plan to make sure our staff feel supported, and that they can add value to what the Brigade does.</td>
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**Staff side responses**

91. Three formal responses to consultation were submitted by UNISON, GMB and the FBU. These responses are appended at Appendix 8. All three responses have welcomed the increased levels of effort that officers have taken to engage the representative bodies in the development phase of the Plan.

**UNISON consultation response**

92. The official UNISON response was received by the Brigade on 25 January 2017. The UNISON response acknowledges the effort made to consult support staff and their representative bodies and makes the point that although a large part of the Plan is concerned with operational issues, there are areas of interest to their members. These include concerns about what collaboration may mean for the employment of their members and the impact that the Integrated Equipment and Logistics Project may have. Concerns about this Project have been submitted by UNISON to the Resources Committee.

93. UNISON has expressed a concern over the proposal to equip crews with technical fire safety knowledge. Although the relevance of the proposal is recognised, UNISON is concerned for its members who currently working in fire safety and express a hope that no reductions are proposed. The union would like to be involved further in consultation on this issue as proposals develop.

94. UNISON also welcomes the proposals to support staff in their learning and development, and hopes that this will include support staff as well. And UNISON echoes the importance of developing an inclusive culture and confirms its commitment to feed into the Inclusion Board and other joint bodies.

95. **Brigade response**: The Brigade thanks UNISON for its timely response to consultation. In terms of the Plan’s proposals about increasing technical fire safety knowledge for crews, officers would
like to reassure UNISON that the aim of this is to improve safety in London rather than pave the way for staffing efficiencies. The Brigade will keep UNISON involved as this piece of work progresses. Similarly, the Brigade will continue to work with UNISON on collaboration and the outcomes of the Integrated Equipment and Logistics Project to make sure that any concerns are addressed. The Brigade is pleased by UNISON’s support for the learning and development proposals and an inclusive culture, and we look forward to working with UNISON representatives to move this work on.

**GMB consultation response**

96. The official GMB response was received by the Brigade on 27 January 2017. The GMB response highlights many of the themes that have been raised by UNISON. Again, GMB acknowledges the effort made to consult support staff and their representative bodies. GMB also outlines the importance of training and development for FRS staff, and the need for a genuine commitment to inclusion for the recruitment and hiring of staff.

97. GMB raises equipping crews with technical fire safety knowledge as a concern for existing fire safety staff, and makes a wider point about the negative impacts that the budget reductions have already had on FRS staff. GMB also makes a request for continued involvement as the Plan’s aspirations become firm commitments.

98. **Brigade response:** The Brigade thanks GMB for its timely response to consultation. As above, officers would like to reassure GMB that equipping fire crews with more fire safety knowledge is intended to improve safety in London and the Brigade will also keep GMB involved as this piece of work progresses. The Brigade looks forward to continuing to work with GMB both on inclusion matters and as outcomes from the Plan are delivered.

**FBU consultation response**

99. The official FBU response was received by the Brigade on 30 January 2017. The FBU response makes several observations across the whole of the Plan, as well as including an appendix produced by local FBU representatives in Kingston regarding the movement of the second fire engine from Kingston fire station to New Malden fire station.

100. The full FBU submission is available at Appendix 8 (along with the other trade union responses). The key points may be summarised as follows:

**Generally supportive**

101. As with the other unions, the FBU has welcomed involvement throughout the development of the Plan. The FBU continues to support the principle of equal entitlement across London to the Brigade’s response services. It supports working closer with the London Ambulance Service given the trial of co-responding and national negotiations on the matter. The FBU is in favour of the Brigade’s aim to increase its flood response capability and would like it to be a statutory duty for fire and rescue services. It is also in favour of setting attendance targets for FRUs and aerial vehicles, that placement of vehicles should be optimised, and that there should be a third training centre.

**Areas of concern**

102. However, the FBU has concerns over some areas of the draft Plan. This includes a note of caution about national collaboration moves. It is expressly concerned about linking the fire service more closely with the police, arguing that such a link could harm the humanitarian and independent nature of the fire service if it has a closer association with law enforcement. The FBU is concerned that it could compromise the Brigade’s position in the community and the
efforts to engage the community more in the work of the fire service. Equally, although the FBU
does support closer working with the London Ambulance Service, it is opposed to any attempt to
merge control rooms.

103. The FBU is also opposed to any different crewing arrangements, including alternate or shared
crewing as put forward by the Plan. This opposition also extends to day crewing or changes to
the current shift system. The FBU opposes the proposed second fire engine relocation from
Kingston to New Malden and has submitted a lengthy response from local FBU representatives
regarding their opposition to the move.

Other points

104. The FBU made two further suggestions in relation to attendance targets:

- to introduce a new attendance target for high rise incidents, proposing a target of six minutes
  for the first and second fire engines to attend, and eight minutes for the third and fourth fire
  engines (6,6,8,8).
- to introduce a percentile measurement for attendance proposing a target for a first fire
  engine to arrive in six minutes 75 per cent of the time.

Brigade response to FBU – general points

105. The Brigade thanks FBU for its timely response to consultation. The Brigade welcomes the
opportunity to work closer with the union on a range of matters in the plan. In terms of the areas
where the FBU has concerns, the Brigade is hopeful of implementing working arrangements
whereby FBU representatives sit on operational change boards, for example, so that more
information can be shared and that union representatives are involved in decision making.

106. Specifically the Brigade will continue to work on proposed targets for FRUs and other
vehicles. We will ensure the representative bodies and relevant staff are involved in that work.

107. The Brigade is proposing to carry out a review of aerials with the FBU and staff to look at
specific issues around ensuring they are optimally located, the introduction of attendance
standards and how vehicles are deployed. The Brigade notes the FBU opposition to day
crewing and changes to crewing in general. Officers would still like to retain the option to pilot
or trial crewing changes as outlined in the Plan. However, from discussions with the FBU during
Plan development, the Brigade would like to explore whether there is potential for a wider
operational review in terms of facilitating more flexible working arrangements. This could
appeal to existing staff, as well as staff who’d like to work for the Brigade in the future.

108. There is no proposal for a specific attendance standards for high-rise buildings, but officers
will seek to work together with the FBU to look at their concerns around high rise incidents.
However, the proposed FBU attendance standard of 6,6,8,8 to high-rise fires could not be
met with existing resources, it would require many additional fire engines and could require
additional fire stations. The introduction of different standards for these fires would run counter
to the principle of equal entitlement, (where the Brigade seeks to get the first and second
appliances to any type of incident anywhere in London), which is supported by the FBU
elsewhere in their response.

109. The Authority did not propose any change to its attendance standards of a first appliance in
an average of six minutes, and a second in an average of eight minutes; it is not recommended to
agree to the proposed change to the first appliance standard for a first fire engine to
arrive within six minutes on 75 per cent of occasions. However, the Brigade will introduce reporting of performance on a percentile basis, alongside our existing reporting arrangements.

Brigade response to the FBU – move of the Kingston second fire engine to New Malden

110. **Station grounds:** Much of the case made in the FBU appendix references station grounds, and how they will be impacted by the change. However stations grounds are no longer used for mobilising to incidents. From November 2015, mobilising has been based on the location of the nearest appliance to the incident.

111. **Timed runs and route planners:** The appendix refers to the importance of timed runs. However, the Brigade replaced the use of timed runs in 2004 and has since used modelling to determine location of resources. The modelling takes into account the likely location of serious incidents (such as fires that need two or more fire engines) and simulates the Brigade attendance to assess the impacts.

112. **Ham, Petersham and Richmond Riverside ward and the 5 minute increase:** The appendix states that average attendance is between 10-13 minutes. Whilst this may happen on occasions, the Brigade’s figures show the average in 2015/16 was 5m:28s. The modelling predicts an increase in the average attendance time of 4m:22s, and this would result in this ward having one of the longest average second fire engine attendance times in London.

113. **Local risks in Kingston and increased attendance times:** The appendix highlights that there are historic buildings in Ham, along with schools, a university and other significant buildings across the borough such as shopping centres and large department stores. Additionally, with a populous ward in Canbury, deprivation in Norbiton, and the number of incidents in Grove, all these areas would be impacted by the change. The Brigade’s Assessment of Local Risk 2016, shows that the boroughs of Kingston and Richmond have (comparatively) some of the lowest ‘concerns’ and ‘consequences’ of all the London boroughs. The concerns raised here are not resulting in a high number of incidents or casualties.

114. **The impact of co-responding:** The issue of co-responding and the impact it will have on attendance times is also raised in the appendix, with a suggestion that the co-responding trial has skewed figures in the areas it is in operation. While co-responding is being piloted, resource planning is not taking account of co-responding incidents. The Brigade agrees that the impact of co-responding will be an important factor regarding any decision to roll it out across London, but on current data, co-responding is having little impact on attendance times London wide or locally. As fire engines generally have a low usage rate, they have been able to absorb the additional work without too much impact.

115. **The move does not address the worst attendance times which currently occur in Kingston:** The appendix makes a repeated case that the plan to move the fire engine does not address the worst attendance times in the borough and that some wards will have slower attendance times as a result of the move. The Brigade acknowledges that some wards would benefit while others would not, however, the Brigade cannot and does not aim to meet its attendance targets at ward level in London.

116. **The modelling fails to take into account three proposed cycle superhighways and their impact:** The appendix raises concerns that cycle superhighways will worsen attendance times and this has shown to be a concern by other respondents too. The Brigade has looked at the impact of cycle superhighways that have been introduced elsewhere in London and they have not resulted in any discernible impact on attendance times.
Consideration should be given to other measures to improve performance: The appendix asks the question whether other measures have been considered without moving a fire engine. Officers are keen to explore other measures to improve performance with local staff.

Other organisational responses

There were 32 organisational responses and this included ten responses received from local authorities. Responses from local authorities were generally supportive of the draft Plan and repeat many of the themes in support of the Plan proposals also raised by respondents to the online survey.

The organisational responses also included Surrey Fire and Rescue Service who offered to share their experiences in terms of co-responding trials, implementing information technology changes, operational set up including vehicle and crewing arrangements amongst other areas, and the Brigade would be happy to share experience and learning across these topics. Russell Pearson, the Chief Fire Officer at Surrey Fire and Rescue Service also complemented the Brigade on “an excellent plan and supporting set of documents.”

Proposed changes to the Plan

Some minor editing changes have been made to reflect updated positions (e.g. The Policing and Crime Bill is now an Act). However, there have been some key changes in response to consultation on the Plan.

Moving the second fire engine from Kingston to New Malden

While the move is expected to benefit greater numbers of people than it adversely affects, the Brigade notes the concerns raised by local residents who may be adversely impacted by the change. Two of the eight wards that would be negatively impacted are expected to experience a significant increase in the average time it will take a second fire engine to arrive. In Tudor ward, this increase is expected to be an average of 5mins 7secs and in Ham, Petersham and Richmond Riverside the increase is expected to be an average of 4mins 22secs. This would mean that those wards experience some of the longest attendance times for the second fire engine across London. Whilst the Brigade can not plan its response service on a ward basis and can not hope to deliver its London-wide attendance standards at the ward level, officers note the concerns of residents in the affected wards and will work with them to explore options for addressing those concerns. Officers also note the efforts made by local crews to improve average attendance performance in the Kingston area.

The FBU response to the consultation also suggested that other measures could be explored to manage local risk without moving a fire engine. Of course, crews and local managers will always ensure that appliances turn-out and travel to emergency incidents as quickly as possible. A key element in the speed of arrival at emergency incidents is the crew ‘turn-out’ time from stations once mobilised. The performance of individual stations and watches is monitored closely by station and borough managers to ensure that performance is as good as possible. Whilst it is not yet clear what those ‘other measures’ might be, officers are keen to explore other measures to improve performance with local staff.

Officers have considered the concerns raised about the proposed move of the second appliance and have reviewed recent performance. Second appliance attendance across Kingston was within 8 minutes on average in 2015/16 and is now predicted to be within 8 minutes on average in 2016/17. This is an improvement over the previous four years, where performance exceeded 8 minutes. Whilst it will be difficult to continue to deliver our London-wide target within Kingston without moving the second appliance to New Malden, given this recent
performance, and local concerns about the move, the Brigade will delay any decision regarding moving the second fire engine at Kingston and will review this in a year’s time.

**Attendance standards**

124. In response to consultation, the Brigade will keep the existing ‘backstop’ measure of getting a fire engine anywhere in London in 12 minutes on 95 per cent of occasions (alongside the new target of getting a fire engine anywhere in London in 10 minutes on 90 per cent of occasions). This has been reflected in the revised final version of the Plan.

**Crewing arrangements**

125. The Plan now acknowledges the opposition to day crewing by the Fire Brigades Union and has been amended as follows:

- As part of this plan, London Fire Brigade will consider options such as - day-crewed looking at piloting a different working arrangement, using an additional fire engine In preparing for the pilot, LFB will consider where the day-crewed fire engine should be located. This will include the 'best' location based on current attendance performance. This pilot will form part of the Brigade’s work on the flexible deployment of resources, as well as broadening the appeal of being a firefighter to a wider section of the community, and to current personnel who may wish to work a different shift system. The Brigade notes the Fire Brigades Union’s opposition to day crewing in particular, and LFB will explore and work with staff side representatives to look at the impacts of any potential flexible deployment arrangements.

126. Similarly, the proposals to explore alternate crewing for aerials and operational support units has been amended to:

- During the lifetime of the London Safety Plan, the Brigade will explore both alternate and shared crewing options for aerials (vehicles which can reach high up or over a wide area) and operational support units, to see if these options have any merit and if they can deliver further efficiencies. The Brigade will work with staff side representatives on any crewing change proposals.

**Indicators and targets**

**Headline targets**

127. The draft Plan included a number of headline targets and these were the subject of consultation (see above). Consultation confirmed those headline targets and the Authority is asked to agree them as part of the Plan. The headline targets, with historic performance data, are set out in appendix 5.

**Other targets**

128. For this Plan, the intention is to focus on the headline targets. Alongside our headlines targets we are also developing a suite of internal facing indicators and measures that are helpful to us manage and run the organisation. We appreciate that some of these are not of great interest to the public. In any event, when finalised, we will publish performance against these indicators, where they have targets, and to publish other numbers to show 'direction of travel'.

129. These more internal facing targets are largely focussed around the five principles set out in the London Safety Plan, namely Inclusion, Safety, Sustainability, Accountability, and
Collaboration. In addition to the measures focussed on our principles, we also have a few targets which help us maintain an efficient and effective professional organisation.

Head of Legal and Democratic Services comments
130. The production of a Safety Plan for London is a requirement of the National Framework issued by the Secretary of State under section 21 of the Fire and Rescue Services Act 2004. Section 21(7) of the Act requires fire and rescue authorities to have regard to the Framework in carrying out their functions. The framework requires the Authority to have integrated risk action plans which are to be the subject of formal consultation.

131. In setting out its management strategy and risk based programme for enforcing the provisions of the Regulatory Reform (Fire Safety) Order 2005 within the Plan, the Authority must also act in accordance with the Regulators Code. The national framework also requires authorities to have effective business continuity arrangements in place in accordance with their duties under the Civil Contingencies Act 2004.

132. The draft Plan complies with the National Framework and all statutory requirements and advice.

Director of Finance and Contractual Services comments
133. This report recommends that the London Safety Plan (2017) is approved. The Plan includes a number of areas where a pilot or trial is recommended to test new ways of working. Any costs arising as part of this process, over the lifetime of the plan, would be funded from the existing London Safety Plan earmarked reserve of £5m. Any ongoing costs arising, or savings delivered, from new ways of working will be addressed through the budget process in future years.

134. The 2017/18 Budget report also includes a proposed draw on the LSP Reserve of £150k in 2017/18 to fund work with fire cadets and also, a proposed draw on funding of £330k for a pilot extended version of Home Fire Safety Visits. The pilots will require 10 FRS B.

Sustainable development implications
135. One of our principles is to ensure that sustainability runs through all our activities. The Plan represents an important public facing commitment to that principle through the Sustainability Strategy, and sets out our key performance improvement priorities, measures and targets in this area. Furthermore, the community safety priorities, which focus on reducing the number of attendances at incidents, together with the review of how we use certain vehicles will reduce the risks arising from unnecessary vehicle movements and our carbon footprint.

136. Sustainability analysis also forms a key strand of the development of every London Safety Plan. The proposals arising from this London Safety Plan have been evaluated through the sustainable development impact assessment process.

Staff Side consultations undertaken
137. Staff side consultation has taken place in developing the Plan, and has continued both during and after the consultation period. This involvement has been integral to the development of the Plan, and is something that both staff side and officers are keen to pursue as the Plan is delivered. Discussions with staff side have included informal meetings with representatives on early direction, the sharing of London Safety Plan presentations regarding content, circulation of a draft version of the Plan, and provision of information to help with consultation responses. The final Plan also contains a separate area on industrial relations and how we propose to improve in this area going forward.
138. There is also a dedicated section in this covering report detailing the consultation responses provided by UNISON, GMB and the FBU, and the Brigade’s response to them. The trade union responses can be seen in full at Appendix 8.

Equalities implications

139. The London Safety Plan sets out how the London Fire Brigade intends to use the resources allocated to it, with regard to the three aims of Prevention and Protection, Response and Resilience, and People And Resources. The five principles provide the underlying values by which these aims are to be delivered.

140. Commitments concerning, for example, collaboration, well-being in the community, opening up of fire stations, strategic partnerships, and co-responding, may require a change in the ways of working for some staff but should not result in a detrimental impact relating to their protected characteristic. The impact on the safety, well-being and inclusion of services users, however, is considered to be positive, and as now can be targeted at communities who are more at risk or harder to reach.

141. Commitments concerning the well-being, recruitment and development of staff recognise the need to maintain and develop actions to improve diversity in the workforce, and should have a positive impact on staff who share protected characteristics.

142. Equality analyses have been submitted as part of the Plan to evaluate commitments through the equality analysis process.

List of Appendices to this report:

2. Publicity and drop in sessions
4. Aims, risks and commitments
5. Four year headline targets
6. Equality analysis
7. Sustainable development impact assessment
8. Staff side responses to consultation
LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985

List of background documents

2. Anthony Mayer Review of Resourcing of the London Fire Brigade and Lord Harris Review of London’s Preparedness to Respond to a Major Terrorist Incident - FEP 2679

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<tr>
<th>Proper officer</th>
<th>Commissioner</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contact officer</td>
<td>Susan Ellison-Bunce</td>
</tr>
<tr>
<td>Telephone</td>
<td>020 8555 1200 Ext. 30061</td>
</tr>
<tr>
<td>Email</td>
<td><a href="mailto:susan.ellisonbunce@london-fire.gov.uk">susan.ellisonbunce@london-fire.gov.uk</a></td>
</tr>
</tbody>
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