



THE ALL-PARTY PARLIAMENTARY GROUP
ON HOMELAND SECURITY

"Raising awareness of homeland security and national resilience issues and reaching consensus on national security policy"

Improving Efficiency, Interoperability and Resilience of our Blue Light Services

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Foreword

By Rt Hon Francis Maude MP

We all depend on resilient and effective emergency services. The police, fire and ambulance services are genuine life-savers, responding to an extraordinary range of incidents on an hourly basis. They do a brilliant job in what are often extreme circumstances, and think little of responding well above and beyond the call of duty.

There are many ways in which collaboration and coordination can and should be enhanced. These needs have been highlighted for example in the 7/7 inquest. There are various initiatives under way and imaginative approaches have been developed locally in areas such as Gloucestershire. In addition we see a range of different models around the world.

In Britain we need to examine constantly how we can do things better. Money is very tight, and technology is opening doors that have long been closed. So it makes sense for us to be open-minded to change. This paper is a thorough and imaginative study, exploring some ways to innovate and develop. I commend the authors for breaking ground that can no longer be treated as untouchable.

Francis Maude is a British politician and is the incumbent Minister for the Cabinet Office and Paymaster General. He is responsible for delivering cross government efficiencies and savings and civil service reform. From May 2005 to June 2007, Francis held the position of Chairman of the Conservative Party and in June 2007 he was appointed Shadow Minister for the Cabinet Office and Shadow Chancellor of the Duchy of Lancaster.

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Executive Summary

Improving the interoperability of our resilience capability is long overdue. Yes, the London 2012 Olympics, the largest and most complex event the nation has hosted, was incident free. But this was thanks to years of preparation for a time-limited event with additional resources and structures that have now largely been dismantled or are at risk of being dismantled.

More tellingly, over the past decade incidents of all scales have demonstrated persistent policy, cultural and technical shortcomings in the ability of different departments and agencies to work together despite the professionalism and dedication of individual staff. Tragedies at Kings Cross, Hillsborough Football Stadium and Buncefield, the large scale floods of 2007, the terrorist attacks of 7/7 and 21/7, and the shootings in Cumbria and Northumbria in 2010 each offered lessons to be learnt – and usually very similar ones – but in practice recommendations have never been fully implemented. The one exception is responding to a complex terrorist attack. The very real threat of a single event with such devastation and complexity, such as marauding firearms or CBRNE attacks, has necessitated the development of discrete capabilities and approaches with additional funding.

In the aftermath of the London Olympics, which exposed gaps in overall response and recovery capability, resulting in bespoke, but temporary, resilience procedures, this paper considers the significant financial and operational efficiencies to be gained with simpler and stronger ministerial leadership, streamlining of government policy formulation and unambiguous inter-agency operational command at both national and local levels. It builds on work led for the Conservative Party by the then Shadow Security Minister, Baroness Neville-Jones, whilst in Opposition, and published in the Party's National Security Green Paper *A Resilient Nation* (January 2010).

The government has started looking at the issue of interoperability again through the formation of a dedicated **Joint Emergency Services Interoperability Programme**, but this work is unlikely to tackle the strategic and policy level questions so often overlooked and is separate from related initiatives such as the Next Generation National Resilience Extranet and Emergency Services Mobile Communications Programme. Overall UK resilience remains wanting as a result. Although coordination for emergency planning is overseen by the **Cabinet Office Civil Contingencies Secretariat**, this Secretariat has no power to challenge or test resilience systems that currently sit in other Government departments or independent forces.

Section 3 reviews how we currently manage varying scales of emergencies and considers how current strategic planning is challenged by the absence of any single authority able to make time-critical decisions. It illustrates how our three emergency services all answer to separate government departments, automatically requiring the need for three different ministers and supporting civil servants, which promote independent policy agendas, logistical support and training structures, financed by separate funding streams. It also illustrates how the 'Lead Government Department' approach, whereby different departments are allocated responsibility for preparing for and managing the response to different crises, can result in plans of variable quality and with little cross-government visibility of requirements. In some areas, such as mass casualty, there are in fact no agreed plans in place for local agencies to familiarize themselves with.

Section 4 looks at how this complex ministerial accountability impacts the blue light services' operational performance. Only when COBR (the top level civil contingencies committee which leads responses to national crises) is sitting, with all agencies represented (and subordinates listening in live), are decisions efficiently actioned in real time and inter-agency/ministerial ambiguities resolved instantly. Once the meeting breaks, any senior, cross department, agency decision making resorts to the cumbersome and vague process of inter-departmental communication. Without a 'CDS' figure sitting above and coordinating the police, fire and ambulance services, each agency remains focused on its own objectives rather than the collective. Despite the introduction of policy and legislation, including the Civil Contingencies Act 2004, and guidance, such as the Cabinet Office Paper: *Responding to Emergencies - Concept of Operations*, the silo mentality prevails in key areas such as organisation, planning, training, personnel, infrastructure, doctrine, concepts, information and logistics. As the diagram shows (see diagram 1),² interoperability is therefore the small overlapping area of collective commitment, rather than the core inter-agency objective.

Section 5 considers in more detail how operational interoperability functions in relation to the three blue light services and how accountable each service is to the different government departments. It looks at ways of challenging the siloed mentality through improved accountability and the creation of a Chief of the Emergency Services, similar to the role performed by the Chief of Defence Staff who sits above the Royal Navy, Army and RAF.

Section 6 analyses how the police, fire and ambulance services could individually and collectively improve their performance and interoperability. A failure to untangle this convoluted web of interoperability has meant that single service advances in structures, processes and technology have deterred any government from attempting to consider even the smallest overhaul. Yet the longer we wait the ever more complicated it becomes to achieve as services develop more embedded processes and technology.

The creation of a **National College of Emergency Service Excellence** would offer more cost effective and collaborative training and allow the UK to develop a world class tri-service establishment. Were all three services to buy into a single location for basic, intermediary, advanced, specialist and all tri-service training, improvements in technical interoperability, protocols and best practice would follow.

Section 7 considers how Britain might follow other countries such as the United States in developing a single **Emergency Response Service** through a merger of the Ambulance and Fire Service. Advancing the ideas in Sir Ken Knight's report on FRS efficiencies this chapter

1 Chief of Defence Staff, Professional Head of the Armed Forces (Royal Navy, Army and Royal Air Force)

2 RUSI paper: Combined Effect: A new Approach to Resilience



looks at the steps which might be taken towards a merged service;³ including a pilot scheme based in the county of Dorset where the two services are already pioneering new methods of collaboration following experience gained during the Weymouth based 2012 Olympic Games.

Finally, **section 8** looks at how the disparity in funding for counter-terrorism compared with other, more traditional, emergency planning has had the unintentional consequence of creating a parallel tiers response which leans on not dissimilar yet ring-fenced assets. It considers how the influx of funds and capability could be better shared if counter-terrorism was not seen in isolation of other forms of contingency planning.



2

Recommendations

NATIONAL

1. Ministerial responsibility for all blue light services brought into one single department, preferably a new **Department of Homeland Security**.
2. Civil Contingencies Secretariat responsibilities bolstered with powers to challenge resilience planning by other government departments and transferred to a new Department of Homeland Security.
3. Establishment of a 'CDS' style **Chief of the Emergency Services** who sits above the police, fire and ambulance authorities with a similar strategic and coordinating role. This senior officer (and supporting staff) should be able to draw on dedicated funding to facilitate the implementation of national standards and requirements across each emergency service.
4. Establish a joint **National Operations and Coordination Centre** building on the infrastructure and experience of the National Olympic Coordination Centre, which has the ability to monitor locations, move blue light assets around the country and tie into Local Resilience Forums.
5. Creation of a single fire and single ambulance authority for England and Wales with hubs of responsibility based on regional boundaries. This would act as a stepping stone towards a full merger of the two services to create an **Emergency Response Service**.
6. Merger of training (to include emergency planning) for the blue light services through the creation of a **National Collage of Emergency Service Excellence** - which would cover all courses from basic (single service) training to gold commander.
7. Successor to Airwave made mandatory for all Category 1 and 2 responders and spectrum issues to be managed on a cross-government basis.
8. Ensure greater coherence between the Joint Emergency Services Interoperability Programme, Next Generation National Resilience Extranet and the Emergency Services Mobile Communications Programme.

9. A single Parliamentary Select Committee (possibly formed through membership of other committees) to scrutinize the work of the blue light services.
10. Develop a cadre of experts across government building on the work of the **National Co-ordination Advisory Framework**. Resilience is a specialist area, and career structures should be built within the Civil Service to develop experts in resilience in each Lead Government Department.

LOCAL

11. **Local Resilience Forums** given a legal status, with the power to direct members and funding taken from savings made through merger of fire and ambulance services. LRFs should assume the functions of Strategic Coordinating Groups and be renamed Civil Contingencies Units. The quality of planning by these units should be independently assured; options include central oversight by a beefed up CCS and peer review.
12. Appropriate professional qualification for emergency planning made mandatory for Local Council Chief Executives and other key representatives who sit on LRFs.

3

Emergency Services Landscape

Observe any traffic accident and the efficiency and ease with which the three blue light services work together is clear to see. The services are accustomed to a localised style of response to a small-scale emergency. But the advent of a more complex threat challenges the traditional style of response.

With the majority of incidents managed at a community level and with each service being governed independently of each other (both locally and nationally), it is no coincidence that all three services have matured not only quite separately from each other, but geographically within each service discipline. Specialist joint teams have developed for the most challenging of threats. These teams are small and meet specific challenges. Their scale is such that resolving something like a marauding firearms attack would still be difficult. There is a requirement to ensure interoperability is “rolled out” on a much larger scale.

Today, a serious incident will require a large number of agencies to work together – the emergency services as well as private sector operators of critical infrastructure – and therefore requires better integration within and between these different organisations. **The Joint Emergency Services Programme (JESIP)**⁴ has done much to advance blue light interoperability, through a shared ethos, reducing bureaucracy and improving situational awareness. But the historical and out of date structures remain and emphasis has been placed on IT and sharing of non-real time information rather than the working relationships between the people using it.

A. THE 43 POLICE FORCES

Although the government has introduced major reforms such as the formation of a **National Crime Agency**, the 43 police forces across England and Wales will continue to enjoy a high level of autonomy in how they operate and spend their allocated funding, particularly given the election of Police and Crime Commissioners. The role of the Commissioners is to appoint the Chief Constable, identify local policing priorities, report annually on progress, and set out the force budget and community safety grants.

The head of the Metropolitan Police, often referred to as ‘Britain’s top policeman’ is, in constitutional and legal terms, no different to any other Chief Constable. Consequently, the

4 <http://www.jesip.uk>

Metropolitan Police has no locus in the national coordination of police resources other than where specific agreement has been reached with the Mayor of London, other Chief Constables and the Home Office (e.g. the National Co-ordinator of Counter Terrorism Investigations).

The independence of constabularies and the absence of a fully functioning centralised operations and coordination centre means there is a built-in delay for any police force being made aware of assets which might be needed at short notice and available in a neighbouring police force. This was starkly illustrated in the Raoul Moat shootings which took place on 3rd July 2010. Northumbria Police eventually requested firearms assistance from Cleveland, Humberside, West Yorkshire, South Yorkshire, Cumbria and the Civil Nuclear Constabulary three days later. Yet it transpired there were armed officer units a few miles away from the area on the day of the shooting, but across the constabulary border.

Responsibility for coordinating the 43 police forces sits within **ACPO** (the Association of Chief Police Officers), which “brings together the expertise and experience of chief police officers, providing a professional forum to share ideas and best practice, coordinate resources and help deliver effective policing which keeps the public safe”.⁵ In reality, the organisation lacks the authority to tell any individual constabulary what to do. Operationally, ACPO is responsible for the **National Police Information Coordination Centre (NPoCC)**⁶ (previously the **Police National Information Coordination Centre, PNICC**), which acts to affect a strategic response during serious incidents such as heavy flooding and terrorist attacks, and handles support to overseas crises involving British nationals. However, it is not fully staffed and is only activated on a contingency basis. In other words, PNICC is reactive and therefore adds little value in the context of fast-moving threats. It remains to be seen whether NPoCC addresses these issues.

Whilst the Chief Inspector of Constabulary’s recent report acknowledged savings and efficiencies could be gained through greater collaboration with other forces or the private sector for different functions⁷ – both frontline and support functions – collaboration is not guaranteed within the policing landscape. In any event, collaboration on certain functions will only improve joint working between forces at a slow rate through the gradual accumulation of shared experience. More can be achieved by fundamentally changing the governance structures and training for police forces.

B. INTRODUCTION OF POLICE AND CRIME COMMISSIONERS

The landscape has become even more complicated for the police service with the election of Police and Crime Commissioners. Will the Commissioners, in practice, have regard to national capability requirements and interoperability with other forces and services? In principle the answer seems to be ‘yes’. Section 77 of the Police Reform and Social Responsibility Act 2011 empowers the Home Secretary to issue a Strategic Policing Requirement to which Police and Crime Commissioners *and* Chief Constables are ‘required to have regard’ in exercising their respective roles.⁸ The Strategic Policing Requirement requires the new Policing and Crime Commissioners to hold Chief Constables to account for developing (or having access to) capabilities to respond to ‘critical incidents, emergencies and other complex or high impact threats in the National Risk Assessment’. In addition, the draft Requirement states that ‘Chief Constables and Crime Commissioners must have regard to the need for consistency in the way that their forces specify, procure, implement and operate in respect of [...] public order,

5 <http://www.publications.parliament.uk/pa/cm201213/cmselect/cmeduc/137/137vw38.htm>

6 <http://www.acpo.police.uk/About/PNICC.aspx>

7 <http://www.hmic.gov.uk/media/increasing-efficiency-in-the-police-service.pdf>

8 www.homeoffice.gov.uk/publications/police/pcc/strategic-policing-requirement?view=Binary

police use of fire arms, surveillance, technical surveillance, response to Chemical, Biological, Radioactive and Nuclear (CBRN) incidents'. The Strategic Policing Requirement goes on to state that 'there is a need for police forces to fully consider their consistency with other emergency services and other partners'. These are welcome noises, but two issues remain. First, what minimum standards underpin the Requirement and have any standards been agreed by the fire and rescue services and ambulance services? Second, how will the Home Office assure the implementation of the Strategic Policing Requirement by each Police and Crime Commissioner and Chief Constable?

C. THE 46 FIRE AND RESCUE SERVICES

Fire and rescue services across England and Wales have, from an operational perspective, been modernised and advanced considerably over the last two decades. Yet, administratively, progress has been slow. On the one hand, firefighters have become far more versatile in the types of incidents they can respond to, on the other, the unions continue to act as a drag anchor over HR reform. Similar to police forces, each fire and rescue service does not directly answer to a higher authority operationally.

Each **Chief Fire Officer** provides procedural and operational directives for their own fire and rescue service (in most cases following county and metropolitan boundaries). They are answerable to the local fire authority, usually comprised of councillors from relevant local authorities. There are currently eight different governance arrangements for the FRS in the UK. 24 report to combined fire authorities. However, 16 are still part of the County Council model where there is a lead portfolio holder. There are also different arrangements for Wales and Scotland. A Chief Fire and Rescue Adviser based in the Department for Communities and Local Government is available to provide strategic advice and guidance to fire and rescue services and to government in the event of an emergency.

There is a coordinating body, the **Chief Fire Officers Association**, which acts as the professional voice, supporting members to fulfill their leadership role in protecting local communities and making life safer through improved delivery. It therefore provides an important strategic role in influencing and government policy, but has no operational function.

Following a number of reviews of performance, written in the aftermath of major incidents such as flooding, the 7/7 terrorist attacks, and the foot and mouth outbreak, local fire authorities are now each obliged to develop an expertise which might be called upon in a level 1-3 emergency. For example, specialist search and rescue capability, high volume pumps or mass decontamination equipment. The DCLG's recent **Fire and Rescue National Framework Work Report** also obliges FRS to develop Integrated Risk Management plans which must not only spell out how any FRS will discharge responsibilities in relation to the local resilience forum's community risk register, but also larger (cross-border, multi-authority or national) fire and rescue related risks.⁹ It also encourages FRS to 'consider areas where collaborative working could improve service delivery, achieve efficiencies and ensure an effective response to incidents.' In practice, this has led to some impressive examples of interoperability, but it is not obligatory and is the exception rather than the norm. Consequently, there are gaps in capability for which the so called **Fire and Rescue Strategic Resilience Board** has been established to plug.¹⁰ It is unclear how this Board will link to the police and ambulance service.

9 <http://www.communities.gov.uk/fire/nationalframework/>

10 <https://www.gov.uk/government/news/fire-and-rescue-national-framework-for-england-published>

D. THE 11 AMBULANCE TRUSTS

In 2006 the number of ambulance areas was reduced from 36 to 11 across England and Wales. This will shortly fall to ten due to the merger of the Great Western and South West Ambulance Trusts. Under the NHS reforms, there is still little clarity around who will be responsible for improving efficiency across ambulance services, or who is able to intervene if a service runs into financial trouble or seriously underperforms. Ambulance services have now become foundation trusts. As Foundation Trusts they have more freedom from central government control, though they remain fully part of the NHS and subject to NHS standards, performance ratings and inspections. Both the local public and staff can become members of any Trust and elect representatives to serve on the Council of Governors, or stand for election as Governors themselves. All Trusts are also accountable to Monitor (the independent regulator of NHS Foundation Trusts), which oversees and monitors them against their terms of authorisation and has powers to intervene.

Chief Ambulance Officers are the highest ranked, medically trained ambulance officers within each NHS Ambulance Trust with responsibility for strategic direction of their specific Trust and control of the day-to-day operations. The Department of Health can take control of the deployment of NHS resources in the event of a complex and significant major incident, including those on a UK wide and International scale, through its **Emergency Preparedness Division Coordination Centre**.

E. FUNDING PRESSURES

Financially, all three services are under enormous pressure and are obliged to find further savings as funding rounds continue to tighten and the freeze on council tax (affecting the formula grant) remains in place. Recruitment freezes are in place across the board, leading to a diminishing work force and creating a skills gap in future years that will eventually threaten performance standards.

Financial pressures are not just divided between the three services, but placed on the individual heads of 43 police forces, 11 ambulance trusts and 46 fire and rescue services, making it a challenge to achieve inter-service efficiencies in areas of training, logistics, equipment and accommodation. An example of this is the protection equipment used in a chemical attack. All three services have procured different types of protection each requiring separate training authorisation programmes and each with their own limitations, meaning the three services could not mutually support each other or spend more than 10 minutes in that environment before one of the services had to leave.

The complexities of the funding formulas for all three services means prudent chiefs are not fully rewarded for the savings they procure, as illustrated by the damping formula used by the Home Office to determine constabulary numbers. These budgetary pressures mean that collaboration is essential to maintain the scale and capacity of capabilities required to effectively meet medium and large scale risks. Some innovative solutions have been explored. For example, the Police IT Company is being formed by 'top slicing' police force budgets, OSCT has a dedicated funding pot for the police CT network, and CCS has a national capabilities programme to fund the procurement of niche national-level capabilities and formation of specialist teams in a small number of forces. But these mechanisms are limited in scale and capacity in the face of risks of ever increasing complexity.

4

Emergencies and the Role of Central Government

A. CATEGORIZATION OF EMERGENCIES

A classified National Risk Assessment prioritises, according to likelihood and impact, the different threats and hazards the UK should seek to prevent, make preparations for and be ready respond to.¹¹ The NRA is updated annually. For each type of risk a Lead Government Department (LGD) is identified for the day to day policy and oversight of these preparations. This national-level assessment should feed into Community Risk Registers so they can be tailored for particular areas but information is limited. For example LRFs receive limited information on positioning and prioritisation of national assets and hazards.

As set out in the Cabinet Office's Concept of Operations and illustrated in the table below,¹² once a risk manifests itself there are five principal categories of emergency:

Type of Emergency	Classification	Involvement
Level 3:	Catastrophic	National involvement - Central direction from COBRA
Level 2:	Serious	Cross region - Coordinated central response led by LGD from COBR
Level 1:	Significant	Cross region (COBRA not involved)
Local Response with GO		Cross force / regional involvement
Local response only		Single scene

¹¹ A public version of this document, the National Risk Register, is published and updated annually to improve public awareness of the types of risks the UK faces and how they can be mitigated. See http://www.cabinetoffice.gov.uk/sites/default/files/resources/CO_NationalRiskRegister_2012_acc.pdf.

¹² <http://www.cabinetoffice.gov.uk/sites/default/files/resources/conops-2010.pdf>

The majority of major incidents are routinely handled by the emergency services and other local responders without the need for any significant central government involvement (e.g. major road crashes, localised flooding and industrial accidents). The police will normally take the lead in coordinating the local response.

The local multi-agency response is coordinated through a **Strategic Coordinating Group (SCG)** located in the **Strategic Coordination Centre (SCC)** chaired by the 'Gold Commander'. This is a coordinating rather than a command function and works in support of the silver (tactical) and bronze (operational) commanders to provide guidance, better situational awareness and linkages to other responders.

For emergencies that cut across force areas and, in particular, regions, more resources will need to be allocated to the response and recovery and this requires greater levels of co-ordination. As a result:

Level 1 (significant) emergencies require central government involvement or support, primarily from a lead government department alongside the work of the emergency services, local authorities and other organisations.

Level 2 (serious) emergencies are those which threaten to have a more prolonged impact requiring sustained central government coordination and support from a number of departments and agencies through COBR, e.g. a terrorist attack, widespread urban flooding, widespread and prolonged loss of essential services or a serious outbreak of animal disease.

Level 3 (catastrophic) emergencies are those where the local response has been overwhelmed and which have a potentially widespread impact requiring immediate central government direction and support, e.g. a major natural disaster, or a Chernobyl scale industrial accident.

B. THE ROLE OF CENTRAL GOVERNMENT

As **diagram 1** illustrates below, three different departments have responsibility for the traditional blue light services, automatically necessitating the requirement for three different ministers and supporting civil servants promoting independent policy agendas. Loosely sitting above this, the **Cabinet Office Civil Contingencies Secretariat** coordinates the government's efforts to enhance the country's resilience in dealing with the full range of emergencies. The CCS coordinates the work of the government departments responsible for contingency planning and response within their areas (e.g. infectious diseases falls to Department of Health, fuel disruptions fall to Department of Energy and Climate Change, etc). It engages with central and local partners to prepare for emergencies and coordinates the central government response to major disruptive challenges.

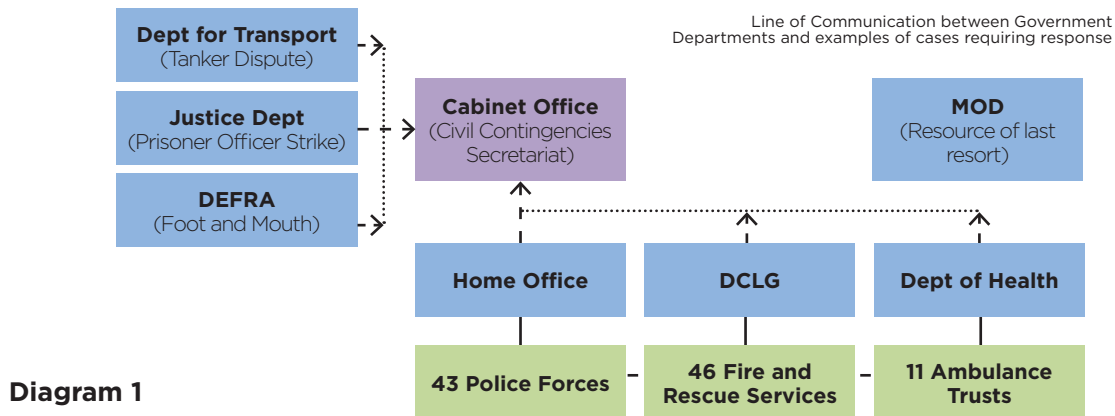


Diagram 1

Although there has been a wealth of legislation increasing the powers of the emergency services and government there has been little legislation affecting the government and inter-services relationship since the Civil Contingencies Act 2004. Inter-emergency decision can be slow and cumbersome. JESIP is now trying to address this.

The activation of **COBR** in response to level 2 or 3 emergencies of course brings together all relevant departmental ministers and officials to provide a response that is centrally coordinated, draws on wider resources and which provides an authoritative source of advice for local responders. Usually based in Westminster, it is required to produce a brief, accurate situation report on the nature and scale of the emergency followed by a Common Recognised Information Picture (CRIP) and handling plan. However, COBR does not solve the problem of pre-existing contingency plans that are not assured, tested or drawn up in a coordinated way by all relevant departments and agencies. Nevertheless, during instances of national or regional crisis that trigger a meeting of COBR, efficiency improves dramatically. However, if key decisions are not taken *during* the meeting then efficiency levels drop.

In reality, the CSS can prompt and offer advice but it is for individual government departments to prepare, draft and execute their own contingency plans. Lead Government Departments are not held to account for their contingency planning. This fundamental weakness was illustrated during the Prison Service strike in 2011: although the Prison Service and Ministry of Justice said they had appropriate contingency plans to continue levels of service, the military had to be put on standby quickly. The military support was unplanned and reactive. While the departments had claimed that their plans were adequate, in reality the plans were not assured and were developed in isolation from other government departments – there was no mechanism to provide independent assurance of, or challenge to, (cross) departmental planning prior to the crisis. There remains a gap: an entity able to develop coherent national standards and requirements, and which has the authority to require and assure their implementation. This is not a new issue. Dr Ian Anderson's report into the 2001 Foot and Mouth outbreak said: 'Immediately prior to this outbreak, contingency plans were in place. But maintaining and updating these plans was not a priority at national level'.¹³

A consequence of different government departments providing strategic lead (and funding) for the three emergency services is the development, over time, of three quite separate styles of operation. Even parliamentary scrutiny is restricted by different Select Committees focusing purely on a single service. Combined with different departments providing leads for different critical sectors, the information sharing necessary for emergency services to operate is difficult to achieve.

C. BOLSTERING THE CIVIL CONTINGENCIES SECRETARIAT

Organisational change does not automatically result in good strategy and policy but can aid its development and delivery, particularly if that organisation injects purpose, efficiency and effectiveness into executive work to enhance existing capacity.

Successive crises have shown that departmental plans are not always of sufficient quality, or that the co-ordination of single plans across government remains weak. Overall:

1. The Civil Contingencies Secretariat needs to do much more to anticipate and address issues upstream.
2. The Civil Contingencies Secretariat needs to become more directive.

13

Foot and Mouth Disease 2001: Lessons to be Learned Inquiry Report, HC 888, 22 July 2002, pg. 6.

3. The capacity of the Civil Contingencies Secretariat's policy planners is limited and should be extended.

In other words, a revolution in the UK's approach to resilience is needed, much like CONTEST and OSCT revolutionised the UK's approach to tackling international terrorism. The OSCT is quite unique in Whitehall because it effectively manages a pan-government strategy; each Department and agency involved in counter-terrorism is accountable to an OSCT Director and has to set out their CONTEST commitments in their business plans.

The Cabinet Office is a coordinating body and there are limits to its executive responsibilities. Leaving a reformed Civil Contingencies Secretariat in the Cabinet Office would therefore not be desirable. There are two options: to absorb the functions into OSCT - though an assessment would need to be made of whether the Home Office's focus on immigration and crime would distract attention from the resilience agenda - or a new entity modeled on OSCT. The organisation's immediate mandate should be to:

- Mainstream resilience into Departmental business plans and board agendas
- Hold Lead Government Departments to account for developing contingency plans for risks identified in the National Risk Assessment
- Ensure that Lead Government Departments co-ordinate contingency plans with other government departments and agencies, to produce joint contingency plans
- Independently assure Departmental and joint contingency plans
- Develop a cadre of experts across government. Resilience is a specialist area, and career structures should be built within the Civil Service to develop experts in resilience in each Lead Government Department.

5

Increasing Tri-service Cooperation

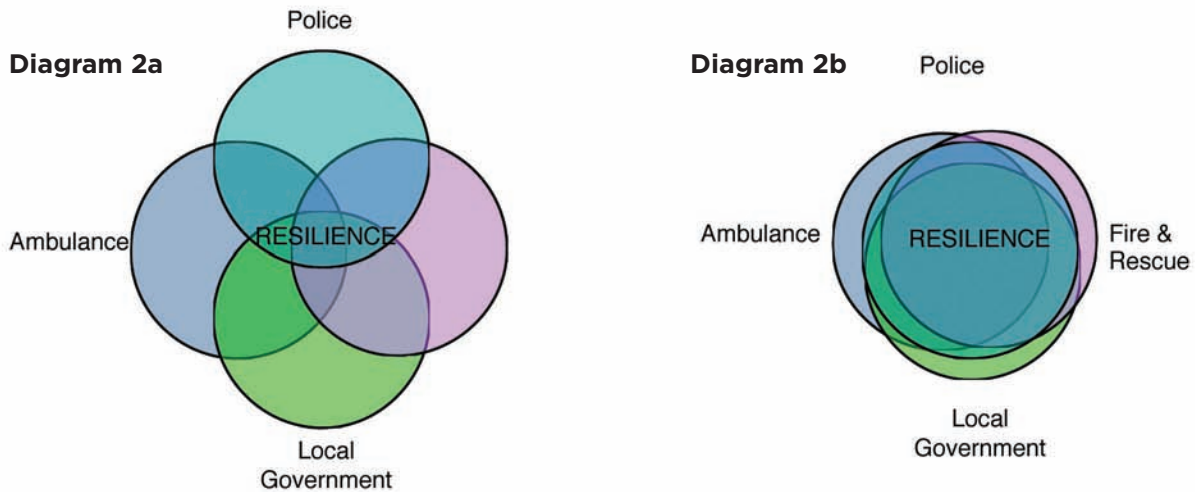
A. IMPROVING INTER-SERVICE RESILIENCE

Although the majority of incidents, handled efficiently and professionally, on a daily basis by our emergency services are at bronze level it should not overshadow the need to improve blue light response to the large scale incident which, of course, occurs very rarely. Where quality contingency plans have been developed and agreed at national and local levels, in anticipation of possible emergencies identified in the National Risk Assessment and Community Risk Registers, these plans are built on top of a dated policy and operational structure that actually hinders cost effective efficiency and begins to 'creak' the more complex the emergency.

In addition to responding to natural disasters, the best developed plans tend to be for certain types of terrorist attack and which have been the subject of detailed joint planning and the formation of specialist joint teams because of their unique nature, and additional funding has been provided through OSCT and the Civil Contingencies Secretariat's National Capability Programme for this purpose. But even for these risks the implementation of response plans on the day can remain problematic due to deficient operational structures: police counter terrorism units, for instance, have always struggled to communicate with each other at highly classified levels because each Unit purchased different technology; each Counter Terrorism Unit and police force is officially independent, and until recently the National Co-coordinator had an uphill battle requesting and coordinating resources for terrorist events that crossed force boundaries until a de facto power was agreed between Chief Constables.

Diagram 2a (courtesy of RUSI) eloquently sums up the dilemma where intra and inter-service resilience is not seen as core to the individual force or service but instead an overlap where any number of the emergency responders might come together to meet a challenge. This current approach means a shared approach to resilience is subsidiary to the majority of tasks taking place in respective silos. This has led to enormous and needless levels of duplication in procedures and protocols, planning, training, procurement, organisation and infrastructure. This is in stark contrast to a more combined approach where the circles are pushed closer

together where, with increased coordination and collaboration, overlaps, duplication and best practice can be more easily identified. Agreed standards and operational procedures are simpler to approve and follow. For a combined effect to take shape there must be a single responsible operational owner at the top which would mirror a more simplified political structure.



B. THE JOINT EMERGENCY SERVICES INTEROPERABILITY PROGRAMME

In June 2012 a ‘**Joint Emergency Services Interoperability Programme**’ (JESIP) was formed, aimed at improving tri-service collaboration at the scene of major incidents by providing nationally consistent generic practices that enhance blue light interoperability for the majority of emergency situations. Key areas of work to be completed include Doctrine & Training, Testing & Exercising, and Procurement & Equipment. This is a step in the right direction but JESIP is time-limited and funded for only two years. It is also separate from work on the **Emergency Services Mobile Communications Programme (ESMCP)**, which is exploring the successor to Airwave, and the **Next Generation National Resilience Extranet** (see page 16). It remains unclear whether this programme will be extended and broadened to keep pace with technological innovation. And despite the formation of JESIP, the independence of the three blue light services in strategic and operational decision-making and accountability (as outlined in section 3) remains unchallenged.

C. A SINGLE CHIEF FOR THE EMERGENCY SERVICES

Only by reviewing the traditional autonomy of the myriad of local power bases can greater co-ordination and efficiency and savings be achieved. To complement a new single department and minister for the blue light services, it would therefore be logical to introduce a **Chief of the Emergency Services**, a lead senior officer responsible for coordinating the interoperability of the three services with the seniority to implement changes in bringing all three services into greater alignment.

Just as the Chief of Defence Staff speaks for the Royal Navy, Army and Air Force (but does not interfere operationally) so too could a Chief for the Emergency Services implement the strategic direction required by government. As with CDS, he/she would also sit on COBR and advise the National Security Council, with the ability to expedite decision-making. Where the new role would come into its own is in creating a more efficient model in the face of a major national emergency; an individual that is responsible for ensuring the UK’s ability to

prepare and respond to manmade threats or natural disasters, with the authority to hold PCCs, the fire and ambulance services to account for meeting national-level requirements. In developing structures for the large-scale incidents, which are indeed rare, one should not lose sight of low level 'bronze' incidents which all three services are efficiently dealing with on a regular basis.

Some might argue that this development would unnecessarily divert resources from the local to the national, to the detriment of communities and to the detriment of the new PCCs in particular. However, such concern can be swiftly addressed. Firstly, the new local LRF arrangements as proposed in Section 5 (below) would be cheaper, freeing up additional resources for local use. Secondly, risks like terrorism, organised crime and natural disasters stretch from the local to the national – often incredibly quickly and dynamically. They require a response that is both rooted in local policing, with local forces having good knowledge of their area to aid responses and contribute to national intelligence pictures, and which is able to draw on and be co-ordinated with resources from outside of the force area or other services.

The new Chief of the Emergency Services should be supported by a beefed up CCS and able to draw on dedicated funding to facilitate the implementation of national standards and requirements across each emergency service. How operations, strategy and policy are subdivided requires further debate.

D. TRI-SERVICE COOPERATION: NATIONAL COLLEGE OF EMERGENCY SERVICE EXCELLENCE

Today all three emergency services continue not only to run separate training packages independently from each other, but also by units within each service. For example, most police forces across the country run their own basic police training cadres.

Advances in technology and the changes in types of threat have given rise to a number of jointly run specialist courses such as **CBRNE, MAGIC** and some counter-terrorist exercises but there is enormous scope for greater collaboration,¹⁴ shared training facilities and development of tri-service protocols.

As personnel progress through their respective rank structure, they gain increasing exposure to multi-agency operations; Operational level (bronze), Tactical (silver), Strategic (gold). However, few courses run as tri-service programmes. There is also no obligation to include any other Category 1 responders, such as the Chief Executive of a local authority.

The Emergency Services College,¹⁵ managed by Serco, delivers Cabinet Office-approved emergency planning and crisis management training. It attempts to bring together all the services and organisations involved in multi-agency working, focusing on the Strategic (gold) level training of large scale emergencies including non-blue light scenarios such as influenza outbreaks. However, attendance or gaining of any qualification is not obligatory. Just 10% of fire and rescue personnel attend courses at this college. The EPC is now also occupied by more over-seas attendees than UK participants.

Whilst it is recognised there are some basic skill sets which are service specific, this should not prevent such training from taking place at a **National College of Emergency Service Excellence** which could run a number of cadres for all three services, including specialist and advancement training for career progression. The more senior courses could be tailored to

14 Chemical, Biological, Radiological and Nuclear; and Multi-Agency Gold Incident Command training.

15 <http://www.epcollege.com/>

include LRF members. As with the UK military academies, courses could also be offered to overseas officers to help fund the establishment.

Were all three services to buy into a single location for basic, intermediary, advanced, specialist and all tri-service training, improvements in technical interoperability, protocols and best practice would easily follow.

D. NATIONAL STRUCTURE FOR COMMAND, CONTROL AND CO-ORDINATION

There are various structures for national command and control of police forces in specialist areas, notably counter terrorism (through the CT Command and Police CT Network) and organised crime (through the new National Crime Agency, building on the regional organised crime centres). There is an outstanding question about national command and control for other risks - one which might be addressed through the formation of the National Police Co-ordination Centre (NPoCC) following the Olympic Games. However, and even in the context of counter terrorism and organised crime, local constabularies continue to enjoy a high degree of autonomy.

Perhaps more importantly, there are outstanding questions about how any improved coordination within the police service will be matched by the Fire and Ambulance services and how to achieve national command and control for all emergency services (enabled by automatic resource location - and tasking - of actual capabilities).

As part of the Olympic security legacy, the government should place the **National Olympic Coordination Centre** (NOCC) on a more permanent footing. The NOCC is unique in being the first entity to have a national overview of a multi-agency safety and security operation, with real time information sharing from 16 different partner agencies including local force control rooms (see figure below). A permanent National Operations and Coordination Centre should set the requirement for the Next Generation National Resilience Extranet (see page 23) and link to - and spur the development of - tri-service control rooms (see page 29).



6

Improving Local Resilience

A. REGIONAL LEVEL RESPONSE

The Removal of Regional Development Agencies (and with it Government Offices) necessitated an update to the guidance relating to the implementation of the 2004 Civil Contingencies Act.¹⁶ This has resulted in DCLG creating a **Resilience and Emergencies Division (RED)**, responsible for providing the government liaison function on resilience issues below the national level. This function was formerly provided through Government Offices in the regions. RED is 'responsible for the interface between national and local level in emergency planning and response and, in many cases, recovery as well.'¹⁷

In practice this means attending Local Resilience Forums (LRFs) and Strategic Coordinating Groups (SCGs) and overseeing their liaison with UK central government. The Division acts as a single team with Resilience Advisors based in London, Leeds and Birmingham. In the event of a major incident a Division Liaison Officer will be dispatched to the Strategic Coordinating Centre (SCC) for the incident and if necessary activate their own Operations Centre in order to provide a focal point for the collection and collation of information on the situation.

B. LOCAL RESILIENCE FORUMS

The LRF brings together representatives of Category 1 (core) responders and Category 2 (cooperating) responders in order to plan for potential incidents and coordinate the operational response to incidents as and when they occur. The design of any LRF is not consistent and is invariably led by an Executive Group (which usually meets on a quarterly basis and comprises the most senior members of the Category one responders and liaison officers from RED, the military and the Category two responders). LRFs commonly have a series of sub-committees and working groups to undertake the preparation of detailed contingency plans for the management of specific community risks, such as severe weather or health issues. However, it receives little or no strategic direction or guidance from central government and in the absence of clear national standards, it is almost impossible for an LRF to benchmark itself, and its ability to respond, against any clear measurements or peer comparators.

¹⁶ <http://www.cabinetoffice.gov.uk/sites/default/files/resources/Emergency-Response-Recovery-24-7-12.pdf>

¹⁷ Answer to H of C PQ 118595 13th Sep 2012

Whilst the 2004 Act requires LRFs to undertake and maintain risk assessments, which are published in a local Community Risk Register, the LRF has no legal powers, so each agency ensures they are not legally vulnerable by committing themselves to plans not covered by their own core objectives. Any LRF budget is reliant on voluntary financial contributions made by the Category one responders.

Furthermore, other than in London and a handful of other major cities, attendance at meetings (by non-blue light services) can be poor or just consist of token representatives sent to fill the seats. As would be expected, police, fire and ambulance services commit a significant amount of time to emergency planning and training so the quality of their attendees is good. Indeed, passing related qualifications is a pre-requisite for promotion, yet the same does not apply to local government or other responders. Whilst there are courses available, such as the National Multi Agency Gold Incident Command (MAGIC) course, these are not mandatory. This means that local partners cannot always contribute well to the planning undertaken by the LRF. In the event of a major incident requiring a multi-agency response the **Strategic Coordinating Group** (SCG) is convened, its makeup being similar to that of the LRF Executive. However, in the recovery phase and during the return to normality, Gold Command usually passes from the police to a local authority representative, who may not be formally qualified to hold this responsibility.

Given the extensive infrastructure and facilities required for managing major incidents the Strategic Coordinating Centre (SCC) is usually located at the headquarters of the local police force. However, affected local authorities (most police force boundaries cover several local authority areas) as well as other agencies including utility companies and the environment and highways agencies, will also tend to activate their own independent bronze command centres. In Dorset, for example, up to 12 separate operational centres could be running simultaneously.

C. LESSONS LEARNED FROM THE OLYMPICS FOR THE FUTURE OF LRFs

These issues were highlighted in the context of the Olympics and the government is aware the workings of the LRFs need to be reviewed. In the lead up to, and during, the Olympics, Finmeccanica's BlueLightWorks programme was invited to closely monitor the Dorset LRF with a view to measuring how well the entity planned for and responded to potential crises. The initial report by BlueLightWorks¹⁸ confirms some worrying issues which are likely to be found in LRFs across the country:

- A general perception was held that the LRF was somehow seen as a separate external body to the civil contingencies categorised responders
- The agencies suggest that the LRF and its role needs to be put on a firmer, more recognised footing
- Time taken for the LRF to gel and focus with clear roles was rather long and respondents felt that the structure and purpose of the local LRF needs review and consideration given to enforcing its mandate and authority
- At Bronze level, LRF members questioned if they could have coped had there been a major incident
- At Gold level, concerns were raised that risk assessments across individual agencies had been completed in isolation

18

BlueLightWorks Report: Lessons identified in planning, preparation and execution of a safe and secure Olympic Games

- The LRF felt that there needed to be more joint exercises across the agencies and to include a variety of different scenarios
- LRF planning meetings had inconsistent attendance and a perception exists that the LRF and its activities are of relative low priority
- With no identified budget, the LRF was constrained in its ability to deliver elements of preparation and planning activities
- A shared lexicon used by all tier 1 and 2 agencies should be agreed
- The National Resilience Extranet was not found to be useful.

The limited functionality of LRFs means, in the event of a serious incident, many senior level responders lean on bi-lateral relationships (developed outside the Forum) to expedite decision making. One single benefit of hosting the Olympic and Paralympic sailing events in Dorset was that it facilitated much closer working relationships between individuals and agencies. But, unless succession planning and training is continued and the LRFs become an entity with clout (including for conducting multi-agency exercises on an annual basis) these relationships may fade.

The concept of the LRF is a good one, but in reality it lacks proper authority and accountability. Emergency management cannot be effective if attendance at LRFs is effectively optional and a silo mentality amongst the agencies will continue until they are obliged to work together. And without a recognised budget, LRFs are unable to organise and plan the exercises needed if interoperability is to be improved.

The consequence of the present nebulous LRF system is a variety of different styles of operation across the country. There is no formal inspection of LRFs. **The Civil Contingencies Compliance Matrix** (against which LRF can be compared) is not mandatory. There is, therefore, little or no opportunity for best practice to be shared and differing approaches may lead to confusion if one area was asked to assist in a major event taking place in another.

D. LOCAL COMMUNICATIONS

There are a number of communications systems that try to support LRFs and information sharing between Category 1 and 2 responders at both local and cross-force levels to meet the requirements of the 2004 Act.

The National Resilience Extranet is a secure web-based system developed by CCS that enables responders to share information up to and including RESTRICTED level. For example, emergency plans can be shared amongst LRF members; details of forthcoming exercises, events and meetings are published; situation reports are communicated; comments on new policies are collated; and there is a repository for lessons learned. However, users find the NRE overly complicated so access is often restricted to a small number of 'super users' who have become familiar with the system. This means that information is not usually entered onto the NRE in real time, but only many hours after the event. In addition to problems of functionality, the restrictions on, and costs of, the NRE user licences that local agencies are required to purchase in order to use the system make it a most unattractive proposition and it is therefore shunned by many agencies.

To overcome these shortcomings, during their Olympic security operation Dorset Police purchased a system called **CLIO** which they shared with all Category 1 and 2 responders. While CLIO cannot be used where information is subject to government security marking, it was used to share unrestricted information in real-time on an all-informed basis between all

Category 1 and 2 responders. CLIO is also easily accessible on web-enabled devices and was universally praised by users for its ease of use, its widespread availability and its functionality.

The Cabinet Office recognises that the current situation and capability provided by NRE is unsatisfactory. A recent report by Dstl on behalf of CCS noted that ‘analysis of the information available leads clearly to the conclusion that both the lack of widespread adoption of the NRE by LRF areas, by areas of government or national agencies and the inability of NRE to support incidents as they happen is largely an outcome of functionality – primarily [...] not having an ability to present up to date, relevant and accurate information at the point of operational need and in a readily accessible format – a Common Operating Picture’.¹⁹ The Civil Contingencies Secretariat has indicated that it would like to take the opportunity of the ending of the current contract for NEW to improve the service by exploiting new technology to meet increasing demands for collaboration, efficiency and interoperability in emergency planning and response work. In particular, the Secretariat says the **Next Generation National Resilience Extranet (NG-NRE)** should provide real time information at the point of operational need to help responders manage incidents across different agencies. In other words, a Common Operating Picture capability is required. The need for government to prescribe mandatory standards and systems with real-time applicability to a common organisational structure across local areas by changing the nature of LRFs and establishing a national operations centre is clear.

Cross-agency communication is essential not just in LRF and SCG settings but also on the ground. The rollout of digital radio communications through **Airwave** has improved communications between all three blue light services to a certain extent (there have been problems – noted since 7/7 – with in-building and in-transit communications, for example).²⁰ However, the biggest weakness is that other Category 1 and 2 responders have been unwilling to invest in Airwave equipment until an incident has taken place – again indicating a lack of national standards and requirements that needs to be addressed. The successor to Airwave provides an opportunity rectify this, provided the solution is mandated on all responders.

With regard to implementing a successor programme (the **Emergency Services Mobile Communications Programme**) successfully, and as an example of the lack of cross-agency co-ordination that exists at present, bandwidth is becoming increasingly limited. This poses unique challenges for the emergency services – a situation not helped by the MoD’s decision to sell part of its spectrum. The emergency services had indicated that keeping the MoD’s spectrum band would have allowed other companies to develop a parallel network and bid for the future contract – therefore encouraging innovation and improved service. Alternative options now have to be explored. One option is for the Airwave replacement to operate over commercial bearers on a day-to-day basis with secure communications provided by encryption of the data rather than the network, but with an additional channel or talk group provided over existing MoD training frequencies that operated when the commercial bearer was either overloaded or damaged. Another option would be for responders to have preferred access to commercial spectrum during times of crisis.

Finally, to achieve a step change in interoperability, it is clear that there must be greater coherence between the Joint Emergency Services Interoperability Programme, Next Generation National Resilience Extranet and the Emergency Services Mobile Communications Programme, within a national framework proposed by this paper.

19 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/79250/National_Resilience_Extranet_Common_Operating_Picture_v1_1_report_0.pdf

20 Airwave: the dedicated multi -agency emergency services nationwide communications network

It is telling that the Civil Contingencies Secretariat has not had a prominent role in informing the MoD's decision to sell part of the spectrum: an outstanding question is 'who manages such cross-departmental resilience issues?' The Secretariat should do so.

E. CONCLUSION

The success of the London 2012 Olympics should not overshadow how fortunate Britain was in not having its resilience capability tested. The LRF construct provides a useful building block, from which an efficient local resilience capability can develop, but its authority and the lines of governmental support need urgent upgrade in order to manage a level 1-3 emergency.

Local Resilience Forums should be given a legal status (with the new framework proposed in this paper), with the power to direct members, and funding taken from savings made through the merger of fire and ambulance services. LRFs should assume the functions of Strategic Coordinating Groups and be renamed Civil Contingencies Units. The quality of planning by these units should be independently assured. Options for this include central oversight by a beefed up CCS and peer review.

Finally, technological solutions can enable rather than hinder interoperability. The need for government to prescribe mandatory standards and systems with real-time applicability to a common organisational structure across local areas by changing the nature of LRFs and establishing a national operations centre is clear.

7

Merging the Fire and Ambulance Services

A. HISTORICAL AND CHANGING ROLES

Following the 1666 Great Fire of London, insurance companies ran rudimentary fire services, only tackling fires for buildings on their books. In the mid-1800s local authorities slowly assumed this responsibility. Although a single National Fire Service was formed during the war, the **Fire Services Act 1947** once again saw councils take over responsibility which led to the County Council and County Borough run fire and rescue services which are not too dissimilar to what we see today.

The ambulance service also has a historical link with the local authorities with the **1946 National Health Services Act** obliging local authorities to introduce ambulance services across the country. Prior to this, services were only found in larger towns and cities and run by volunteers, and were used to transport patients to hospitals without administering any medical treatment along the way. Only after the 1964 Miller Report did ambulance services start introducing trained and registered personnel who were able to provide some clinical care. Today, paramedics operate as autonomous practitioners who are able to provide a variety of treatments without the direct approval of a doctor.

B. MEDICALLY TRAINED FIRE SERVICE

The historical role played by the fire service has changed since its inception. They deal less with fires per day than other types of incidents, both man-made and natural. And their large geographical footprints, taken with the locally-based 'retained' employment status of many firefighters in non-metropolitan areas, means they are often the first agency on the scene and are increasingly providing critical emergency care in order to keep victims alive before the ambulance services arrive.

Changes in technology (notably the external defibrillator) and increased financial pressures have led to other agencies, particularly the fire service and indeed volunteer groups, being allowed to develop skill sets and work with the ambulance service.

Many of those who die before reaching hospital after major incidents do so from easily treatable causes such as a lack of oxygen or excessive bleeding, and death from these treatable causes occurs in many cases only a few minutes after the accident. It therefore makes sense to have personnel at the scene early that can treat these problems, and firefighters may well be the first at the scene. The FRS is, of course, not just about response and has specific statutory duties in relation to commercial, residential and private fire safety and prevention.

Nevertheless, the question should be posed (setting aside the enormous administrative complexities), as to whether a merged service would provide better value for money and improved service for the public. Present cost of running England's fire and rescue services is **£2.2bn**,²¹ while for the ambulance services the cost is **£1.9bn**.²²

C. INTERNATIONAL PRECEDENT

The idea of a joint 'Emergency Response Force' is not new and already operates in a number of Western countries including the United States, France, Holland and Germany. In these countries, the urban service often differs slightly from the rural one, in maintaining distinct fire or ambulance roles with vehicles. In rural areas firefighters (including the volunteers) take on a dual role.

In Australia and Canada, fire services have developed a supplementary role as co-responders where the fire service is paid to respond to an ambulance call out and deliver the patient to the hospital, or in complicated incidents, provide lifesaving treatment until the ambulance arrives.

These international comparisons show that merged services, or simply co-responding, can and does work. But often the level of integration is a reflection of the history and organisation of emergency services and the reluctance of government, unions or the services themselves to embrace change.

D. CO-RESPONSE SCHEMES IN THE UK

Collaboration between the ambulance and fire services is already quite advanced. It was first trailed in 1996 in Wales, but despite a number of government papers encouraging the practice,²³ progress was initially slow due to Union opposition on grounds of contractual obligations, training and workload of its members. By 2000 there were ten fire stations operating co-response. The Fire and Rescue Service Act 2004 introduced broader statutory objectives which encouraged more fire and rescue services to widen the parameters of their working, leading to the number of operating co-response units rising to 99 by 2007. Sadly, more up to date figures are not available but it is assumed that the number of units would be higher with the majority run by retained staff.

In the majority of cases, rural retained fire stations provide cover for the ambulance service who are unable to offer such a wide footprint. They not only help ambulance services meet their 8 minute response time, but also help save lives by treating patients early enough in life threatening cases. Nationally, about 70% of the co-response calls are category A (immediately life-threatening). In most cases the co-response callouts form less than a third of the station response activity. Usually a memorandum of understanding is signed between the ambulance and fire services confirming the type of callouts which can be covered. This does not normally include young children, maternity or violent patients. Costs are paid by

21 Local Authority Revenue Expenditure and Financing, England 2012/13 Budget - July 2012

22 National Audit Office. Transforming NHS ambulance services - June 2011

23 Bain Report 2002 and the 2005/6 Fire & Rescue Service National Framework

the ambulance service and average around £50 a call out.

Examples of co-response operations include:

- Greater Manchester FRS
- East Midlands Airport FRS
- Staffordshire (All 850 personnel must pass 'First Person on Scene qualification')
- Dorset FRS
- Mid and West Wales
- Hampshire (reduction in double ambulance responses being sent as the fire services are used as first responders on the scene)

Advantages to further integration:

- Improved life-saving services leading to the reduction of unnecessary mortality
- Economies of scale – cost savings
- Removal of duplication
- Simpler standards to enforce and maintain

E. PROCESS TOWARDS EVENTUAL MERGER

Merging organisations of this scale is of course immensely complicated and the first step would be to reconcile the geographic footprints of the respective ten ambulance trusts and the 46 fire and rescue authorities – as illustrated in Annex A. As sir Ken Knight's recent report on FRS efficiency implies, a number of county FRSs are too small and should be merged to improve efficiency. If FRSs were to reduce in number then aligning fire and ambulance geographic footprints would be a logical step forward. This would allow greater integration of administration, training, premises sharing, equipment procurement and, of course, operations.

A more radical approach towards a full merger might be the creation of a single ambulance authority and single FRS for England and Wales broken down into possibly ten administrative hubs which adopt the regional political boundaries. Were any form of alignment achieved it would place pressure on police constabularies to follow suit.

F. ADVANTAGES TO FURTHER INTEGRATION

- Improved life-saving services leading to the reduction of unnecessary mortality
- Economies of scale – cost savings
- Removal of duplication
- Simpler standards to enforce and maintain.

G. CALL CENTRES

Nationally, the ambulance service receives approximately 7.5m calls a year, in comparison with the fire and rescue services, which average 1.5m calls. The police received 7.6 million emergency calls in England and Wales in 2011/12. In light of this, and the established need for greater inter-operability, ambulance control rooms, for example, could easily absorb fire call

centres to create a more robust and coordinated response to an emergency. Indeed, during industrial action taken by firefighters over the past decade, emergency calls to the fire and rescue service were easily absorbed by police control rooms across the country.

For example, the East Midlands Ambulance Service NHS Trust (EMAS) covers the six counties of Derbyshire, Leicestershire, Rutland, Lincolnshire, Northamptonshire and Nottinghamshire.²⁴ The control centres for this service are based in Nottingham and Lincoln. The East Midland Fire and Rescue service covers the same area and population, yet the control centre is located in Castle Donnington, Leicestershire.²⁵

This may seem relatively compact, however, in comparison to other areas. For example, The South West Ambulance Service is responsible for Dorset, Somerset, Devon, Cornwall and the Isles of Scilly, the call centres for which are based in Exeter and Dorset, whereas the fire and rescue service for the region is broken down into 3 separately functioning bodies: the Devon and Somerset Service is based in Exeter, the Cornwall service in Truro and the Dorset Fire and Rescue caters for the County of Dorset and the unitary authorities of Bournemouth and Poole and is located in Dorchester. In this instance a clear lack of mutual responsibility and cooperation exists.

If the fire services in this region were to merge as the Ambulance Trust has done and the two services work alongside each other, with call centers in Exeter and Dorset, presumably the response to an emergency could be more targeted and efficient.

In Wiltshire a tripartite control centre has been created in one building based in Devizes, but they have entirely separate call rooms for fire, ambulance and police based on three separate floors. This setup was installed 10 years ago and, due to the limitations of the PFI agreement, the initial arrangements remain unchanged. Indeed, the Ambulance Trust has recently moved out of the building as they wanted to pursue completely separate arrangements.

A similar arrangement exists in Gloucestershire, where the call centres for all three blue light services are in a purpose built facility adjacent to the Gloucestershire Constabulary force headquarters but all three services remain in their individual control rooms.

Following the cancellation of the Regional Control Centre Project the £81M saved was directed at English FRSs to improve resilience arrangements but without any co-ordination as to how this might be spent across the country.

24 <http://www.nhs.uk/aboutNHSChoices/professionals/healthandcareprofessionals/quality-accounts/Documents/east-midlands-ambulance-service-nhs-trust.pdf>

25 <http://www.burtonpedwardine.org.uk/uploads/2008/08/RCC%20brochure%20July%2008%20low%20res.pdf>

8

Protecting Critical Sectors

The emergency services do not just rely on each other to respond to crises effectively. They are also dependent on critical sector operators (Category 2 responders) to provide information to facilitate emergency planning and response. Indeed, it is often the failure of infrastructure that results in emergencies – whether due to system, manmade or natural causes – so having access to information is vital for contingency planning and to try to prevent a crisis from occurring.

The majority of infrastructure operators are in the private sector and subject to regulatory regimes, yet the quality of regulatory regimes in respect of security and resilience is variable. Moreover, different Lead Government Departments have overall responsibility for different critical sectors, yet do not necessarily have the requisite expertise to arbitrate between regulators and operator. Organisational silos result and hinder understanding of the state of our critical sectors.

The Civil Contingencies Act 2004 did, of course, place an obligation on Category 2 responders to co-operate and share information with public authorities before, during, and after crises, yet the Pitt Review found this existing obligation insufficient and made two important recommendations:

- that ‘the government should strengthen and enforce the duty on Category 2 responders to share information on the risks to their infrastructure assets, enabling more effective emergency planning’;
- that ‘the government should issue clear guidance on expected levels of Category 2 responders’ engagement in planning, exercising and response and consider the case for strengthening enforcement arrangements’.²⁶ Pitt further suggested that ‘the government and infrastructure operators should work together to build a level of resilience into critical infrastructure assets that ensures continuity [during natural hazards]’, including by placing a duty on economic regulators to build resilience in **Critical National Infrastructure (CNI)**.²⁷

²⁶ Learning lessons from the 2007 floods: An independent review by Sir Michael Pitt, 25 June 2008, Recommendations 55 and 56.

²⁷ Ibid.

The government has tried to establish a more coherent approach to **CNI** through the formation of **Infrastructure UK** within the Treasury. However, this body is primarily focused on the opportunities that infrastructure provides for economic growth, which tends to translate into new infrastructure projects rather than analysis of the state and protection of existing infrastructure. The Civil Contingencies Secretariat therefore set up a **Natural Hazards Team** to establish a cross-sector resilience programme between the government, regulators and industry, to address the short term (**0 to 5**) vulnerability of national infrastructure to hazards. The resulting **Critical Infrastructure Resilience Programme** is designed to encourage better practice and to foster co-operations, and has resulted in the development of annual planning rounds to develop Sector Resilience Plans: the 2010 planning round assessed the risk to UK's most important infrastructure from inland and coastal flooding; the 2011 round extended the scope to all natural hazards; and the 2012 planning round extended the scope further to allow departments to review the resilience of their most important infrastructure to all risks (threats and hazards).

A. INFORMATION SHARING

While improved departmental information sharing is a positive development, four challenges remain:

- The incentives for operators and regulators to invest in resilience remain lacking and variable, and there is still no duty to build resilience into CNI
- In terms of actual delivery and governance, responsibilities and accountabilities are still siloed within government departments, agencies and regulators, with little coherence or connectivity across the network of networks. CCS is attempting to look across the national infrastructure as a whole but does not have authority for the entire system-of-systems
- There remains little or no knowledge of the vulnerabilities and risk arising from interdependencies across the national infrastructure
- As a result, there is no overall vision of what a resilient CNI should look like. Moreover, the information sharing – albeit on an annual, rolling basis – is focused on a five year period and therefore ignores very important issues such as the capacity of critical infrastructure to meet long-term socio-demographic demand.

Even when operators and regulators do share information and invest in resilience, how they undertake risk assessments and implement different measures to improve is variable.

B. A SINGLE NATIONAL APPROACH TO RISK ASSESSMENT OF CNI SITES

A similar situation exists in relation to counter terrorism: there remains no uniformity of approach across the CNI sectors regarding how threat assessments are conducted, and protective security requirements set or assured. Take the example of armed policing at critical infrastructure sites. Armed policing is currently delivered differently (to differing operational standards) by a number of different Home Office and Scottish forces, as well as the Civil Nuclear Constabulary and Ministry of Defence Police. Yet if there is to be a coherent approach to the deployment of armed police officers to protect CNI, it should be anchored in a single doctrinal approach to security and should include:

- the “Key Principles” set out in the CPNI’s National Guidance on Partnership Working for CNI Protection; the MoD’s adoption of the principles of As Low As is Reasonably Practicable (ALARP);
- the use of Multi Agency Threat and Risk Assessment (MATRA) by Home Office forces for airports;
- agreed standards in the civil nuclear sector driven by the Nuclear Industries Malicious Capabilities Planning Assumptions (NIMCA).

Government must grasp the opportunity to develop a **national approach to risk assessment**, from which follows a national doctrine and national concept of operations.

The problem with having different approaches to assessing risk and determining protective security/resilience in different sectors is that ministers cannot have an objective assurance about the overall level of risk they are accepting across the country. There can also be no objective criteria by which to decide how security measures are chosen at particular sites and whether those measures represent value for money.

Building on the **Sector Resilience Plan** process, government urgently needs to develop and embed one common methodology/approach for all CNI sectors for:

- determining which parts of the CNI are vital and what the vulnerabilities are, including interdependencies;²⁸
- determining what the different risks to CNI sites are and the likely impacts of these risks should they occur (including political/reputational/psychological/public confidence impact);
- putting in place risk mitigation strategies. These should be monitored, inspected and assured centrally.

The methodology should also look at long-term risks such as socio-demographic demand. Infrastructure UK and the Critical Infrastructure Resilience Programme should be merged into a single body and come under the authority of the CDS style Chief of the emergency response community. To ensure enhanced engagement (rather than just information sharing) with regulators and operators a new mechanism modeled on the US National Infrastructure Advisory Council should be set up.

Finally, as part of the task of achieving coherence across different sectors, the status of the civil nuclear sector must be reviewed. The sector currently sits outside both the CNI and national security machinery, and it is an odd situation to have a police force (the Civil Nuclear Constabulary) implement national security standards that are determined not by government but by a regulator.

C. EXPLOITING SYNERGIES BETWEEN COUNTER-TERRORISM AND OTHER CIVIL CONTINGENCIES

As a result of the (understandable) priority attached to counter-terrorism over the past decade, a reactive approach has been taken to most other crises and government departments and agencies have not made resilience as much of a priority as they should have. Few departments and agencies have full awareness of the National Risk Assessment. As discussed above, in

28 Note: this will involve reassessing the criteria CPNI uses to categorise different parts of the CNI.

the absence of an OSCT-type structure for resilience Lead Government Departments are not held to account for their contingency planning.

A beefed up CCS and a common approach for assessing critical infrastructure across both natural hazards and terrorist threats will deliver real assurance benefits across government and encourage Departments to think more widely than just counter-terrorism. As part of this, a cadre of experts should be developed across government and Category 2 responders; resilience is a specialist area, and appropriate career structures should be built within the Civil Service, operators and regulators.

The approach could also result in real operational efficiencies. For example, Counter Terrorism Security Advisers could be tasked with providing advice on broader resilience issues. It makes sense that an existing inspection regime which is well established and high profile should have a broader remit: when CTAs inspect sites and provide advice to operators and businesses, there is no reason why that inspection and advice should not cover resilience issues as well as counter terrorism.

D. MERGING THE CIVIL NUCLEAR CONSTABULARY AND MoD POLICE

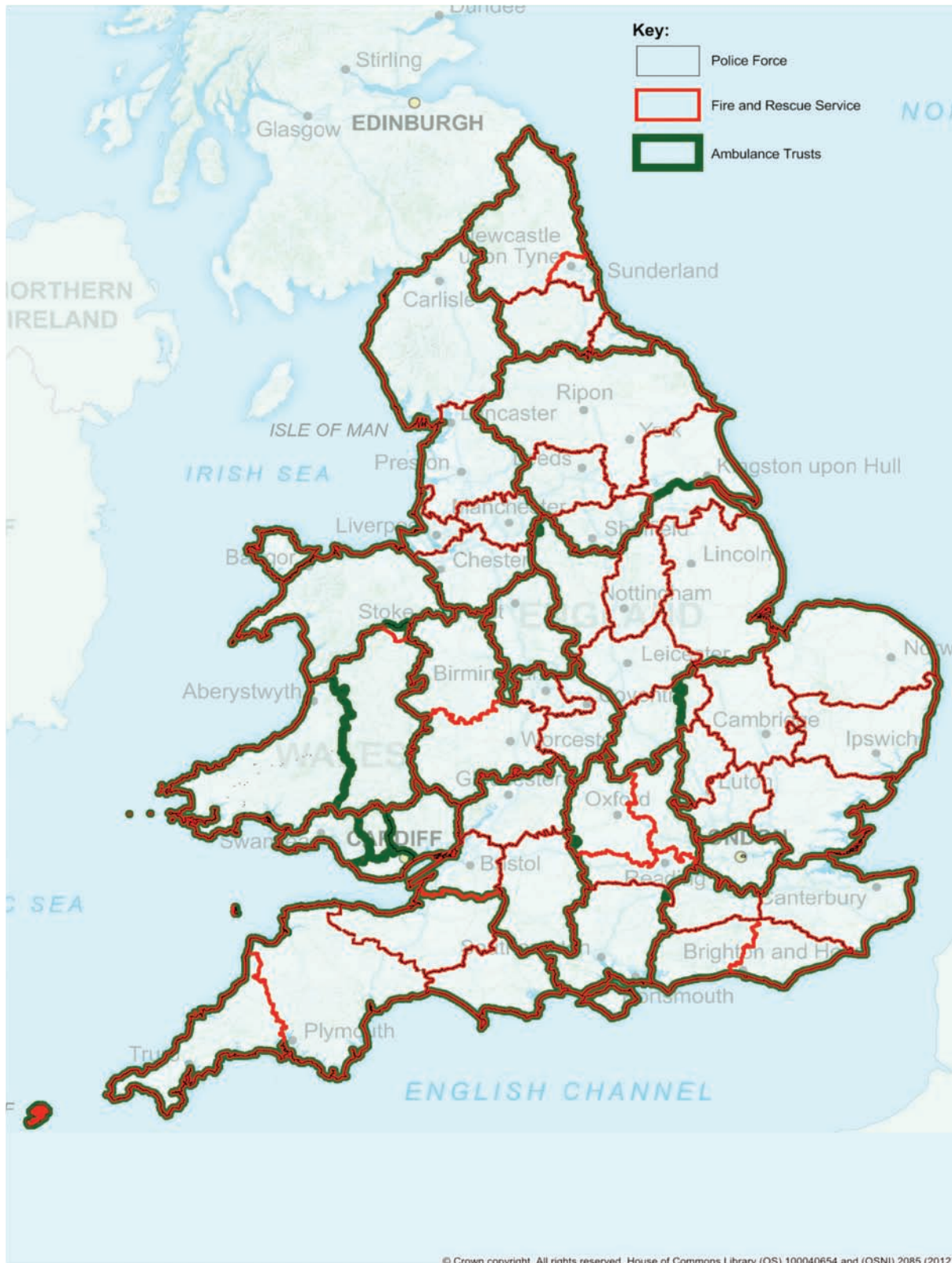
For very complex crises at CNI sites will local services have the capacity to respond, even if they have been provided with high-end capabilities? An alternative approach would be to explore the merger of the Civil Nuclear Constabulary and Ministry of Defence Police; a merged CNC/MDP focusing on gas and nuclear sites could provide the basis for an expanded CNI capability whose remit could later include whatever elements of CNI the government deemed it appropriate, including airports, ports, borders and possibly even events such as the Commonwealth Games, World Cup.

In addition, this larger force could later be tasked to develop a national response capability for certain risks. The government has formed specialist teams for responding to marauding firearms attacks in key police forces. These teams are often small, so while it is easy to maintain necessary levels of training and readiness they are likely to be overwhelmed quickly. In contrast, the CNC and NDP have greater capacity, readiness and experience in relation to complex crises than most others. They also have an extensive footprint across the country given the locations of nuclear and other sites which they already protect. Marauding attacks, CBRNE attacks and natural hazards such as large-scale flooding are real risks to infrastructure sites which the forces already have to deal with. These are the same risks faced by cities and towns and, given the existing proximity of the CNC and MDP to population centres, they could form the basis for a national response to complex crises that is augmented by local forces.

A few years ago, the Ministry of Defence undertook a review of the status and functions of the MDP which, among other things, recommended merging the MDP and CNC. However, the recommendation did not (at least at that time) make sense as MDP has a much wider range of functions quite separate from protecting critical infrastructure, such as CID.

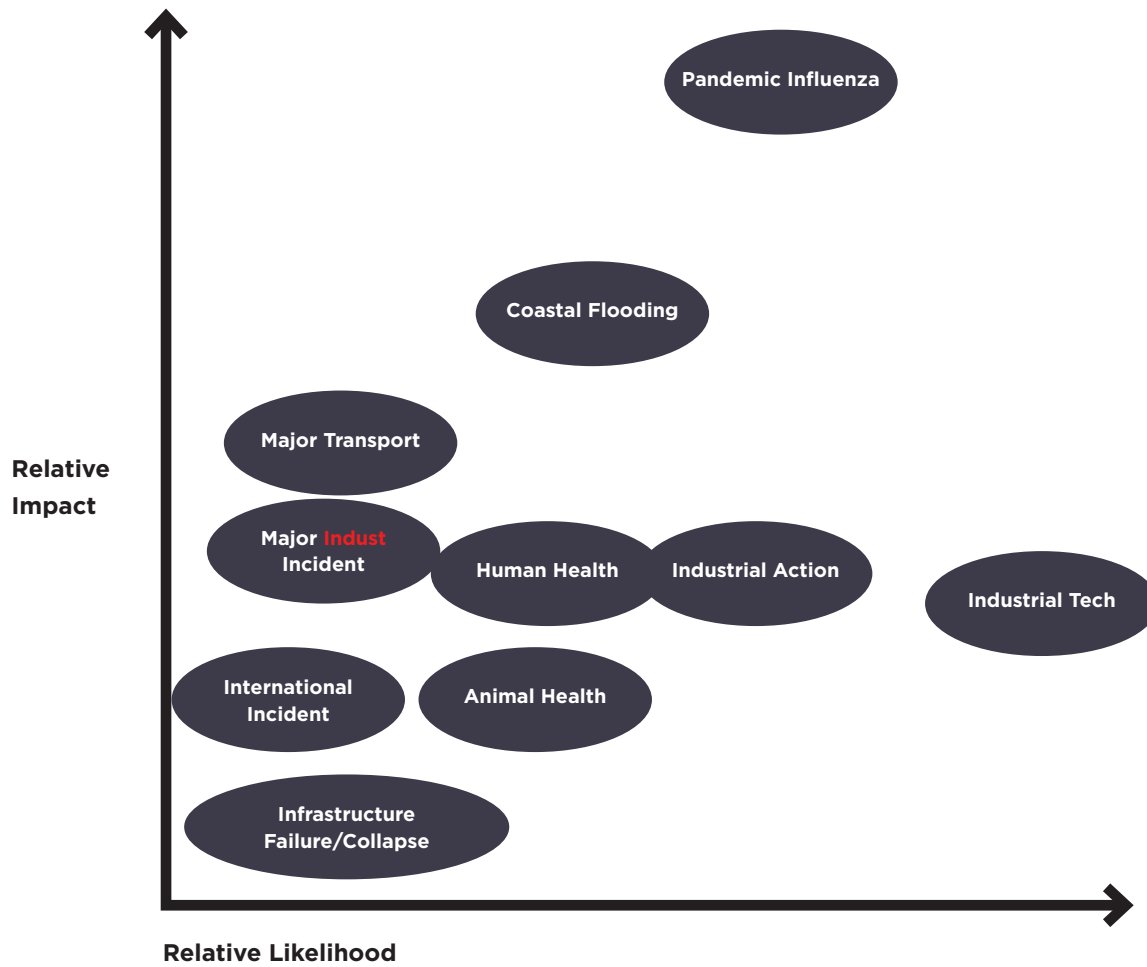
The **MDP** has since shrunk following spending reviews and will only retain their CNI policing function. They have also been asked to provide a “surge capacity”, to achieve an increase in the number of armed officers at some nuclear sites. In this context it might make sense to merge or integrate them with CNC: the synergies between the two forces look increasingly attractive.

Annex A: Map of Blue Light Service Responsibility



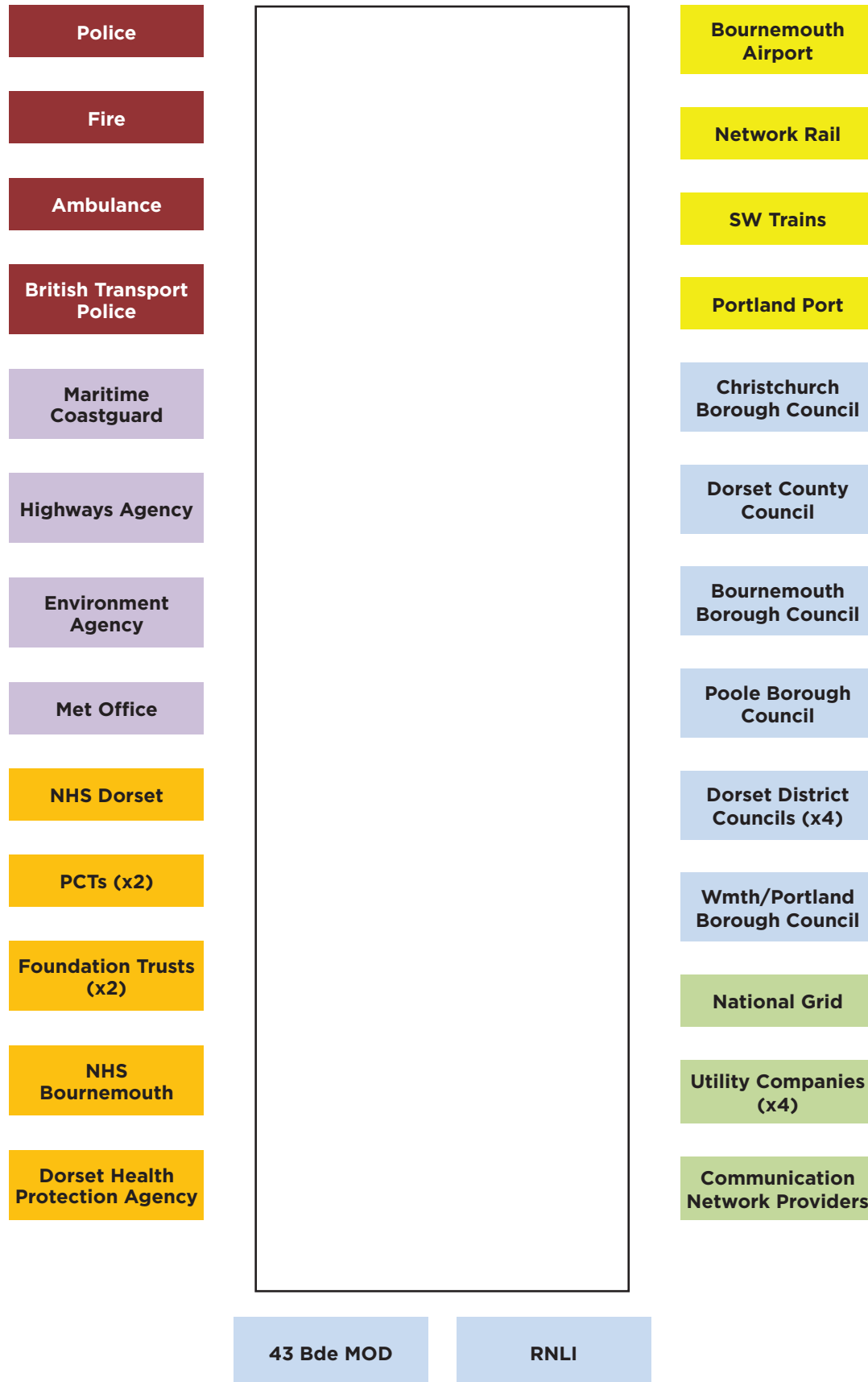
Annex B: Community Risk Register

An illustration of the high consequence risks facing communities in the Bournemouth, Dorset and Poole Local Resilience Forum area.²⁹



29 [http://www.dorsetfire.co.uk/uploads/file/CRR%20Public%20Final%202010\(1\).pdf](http://www.dorsetfire.co.uk/uploads/file/CRR%20Public%20Final%202010(1).pdf)

Annex C: Makeup of Dorset LRF



Information on the All-Party Parliamentary Group on Homeland Security

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