

## ANNEX A – TEMPLATE FOR CONSULTATION RESPONSES

### Details of the Consultation

<b>Document being consulted on:</b>	Renewing Civil Contingencies Act Arrangements for London
<b>Closing date:</b>	<b>26 February 2010</b>
<b>Responses to be sent to:</b>	ccact@cabinet-office.x.gsi.gov.uk
<b>Queries to:</b>	Martin Klaassen:  <a href="mailto:Martin.Klaassen@cabinet-office.x.gsi.gov.uk">Martin.Klaassen@cabinet-office.x.gsi.gov.uk</a> 0207 276 5017

### Consultation Response

<b>Name:</b>	Arthur Rabjohn	
<b>Title:</b>	President	
<b>Organisation:</b>	IAEM Europa	
<b>Contact Details:</b> (Will be used if we need to follow up any of your detailed comments. Please provide an e-mail address and telephone number if possible)	arthur@ccaconsultants.eu	
<b><u>London Resilience Forum</u></b>		
<b><u>Question 1:</u></b> Are you content for London to have a single Local Resilience Forum for the Greater London area? <i>This requires a change to the Regulations (draft Regulations 5 at Annex E) and Chapter 9 of Emergency Preparedness (Annex F)</i>	YES	[Delete as appropriate. Add comments in box below]
<b><u>Comments on Question 1:</u></b>  It is a step in the right direction. However we feel that a single London Office of Emergency Management providing a focused professional body of full time practitioners is required to deliver the needs of the capital. Like many other global cities a single purposeful office is needed to carry out the day to day work of a comprehensive emergency management programme (CEMP). This would merge the work of the LRT, LFEPA and a number of other bodies into one office. The single London LRF would then sit as an executive advisory body to the Mayor of London and assist direct the work of the London OEM. The London OEM could then support the local needs of the London Boroughs and bring them into the pan London aspects of its CEMP		
<b><u>Question 2:</u></b> Are you content with the <i>Aims</i> in the draft terms of reference for the London Resilience Forum (Annex G)?	NO	

<p><i>The model terms of reference will be placed in an Annex to Chapter 9 of Emergency Preparedness.</i></p>	<p>[Delete as appropriate. Add comments in box below]</p>
<p><u>Comments on Question 2:</u></p> <p>LRF's are talking shops with little in the way of resources or powers to deliver actual work programmes. They call upon emergency practitioners to add additional work to their full time roles within their own organisations. We believe that as a strategic executive they can direct a programme but cannot deliver it and as such a dedicated London OEM is needed.</p>	
<p><u>Question 3:</u></p> <p>Are you content with the <i>Objectives</i> in the draft terms of reference for the London Resilience Forum (Annex G)?</p>	<p>YES</p> <p>[Delete as appropriate. Add comments in box below]</p>
<p><u>Comments on Question 3:</u></p> <p>Great strategic objectives but with the LRF has no dedicated team of EM practitioners to deliver its identified needs to build resilience in London. Needs are identified, ambitions agreed but then there is not concerted focused delivery as the requirement is then a expectation placed upon a huge number of 'players' with different priorities and capabilities.</p>	
<p><u>Question 4:</u></p> <p>Are you content with the <i>Membership</i> listed in the draft terms of reference for the London Resilience Forum (Annex G)?</p>	<p>YES</p> <p>[Delete as appropriate. Add comments in box below]</p>
<p><u>Comments on Question 4:</u></p> <p>If the committees/panels structure is the way London is going then yes.</p>	
<p><u>Question 5:</u></p> <p>Category 1 responders (local authorities, emergency services, health and the Environment Agency) will be required to attend each meeting or send effective representation and therefore will comprise the core membership of the London Resilience Forum. Are there any other organisations which should be part of the core membership of the London Resilience Forum?</p> <p><i>This will be defined in the model terms of reference annexed to the guidance and not in the Regulations.</i></p>	<p>NO</p> <p>[Delete as appropriate. Add comments in box below]</p>
<p><u>Comments on Question 5:</u></p>	
<p><u>Question 6:</u></p>	

<p>Under the Regulations, the London Resilience Forum will be required to meet at least every six months but may meet more frequently. How frequently should the London Resilience Forum meet? <i>This will not be defined in the guidance or the Regulations.</i></p>	<p>Quarterly</p> <p>[Delete as appropriate. Add comments in box below]</p>
<p><u>Comments on Question 6:</u></p> <p>If they are going to provide strategic oversight to a programme of work they should meet at least quarterly.</p>	
<p><u>Question 7:</u></p> <p>Are any changes required to the way in which the regional function is delivered? <i>This will not be set out in the guidance or the Regulations.</i></p>	<p>YES</p> <p>[Delete as appropriate. Add comments in box below]</p>
<p><u>Comments on Question 7:</u></p> <p>Clear structure to direct and resource a CEMP is needed.</p>	
<p><b><u>Sub-Regional Resilience Groups</u></b></p>	
<p><u>Question 8:</u></p> <p>Are you content for the Sub-Regional Resilience Groups to be established on a non-statutory basis? <i>This means that Sub-Regional Resilience Groups will not be defined in the Regulations or the guidance and requires a change to the Regulations (draft regulation 5 at Annex E) and Chapter 9 of Emergency Preparedness.</i></p>	<p>NO</p> <p>[Delete as appropriate. Add comments in box below]</p>
<p><u>Comments on Question 8:</u></p> <p>London needs a dedicated Office Emergency Management, not a collect of sub-groups utilising the best efforts of individuals with other full time jobs that are their primary function.</p>	
<p><u>Question 9:</u></p> <p>Are you content for the Sub-Regional Resilience Groups to be arranged on the basis of the existing Local Resilience Forum groupings in London (Annex B)? If not, what groupings do you suggest? <i>This will not be defined in the Regulations or the guidance.</i></p>	<p>NO</p> <p>[Delete as appropriate. Add comments in box below]</p>
<p><u>Comments on Question 9:</u></p> <p>See above</p>	
<p><u>Question 10:</u></p>	

<p>Are you content with the <i>Aims</i> in the draft terms of reference for Sub-Regional Resilience Groups (Annex H)?  <i>The terms of reference will not be placed in the guidance.</i></p>	<p>NO</p> <p>[Delete as appropriate. Add comments in box below]</p>
<p><u>Comments on Question 10:</u></p> <p>The London OEM should have an audit and inspection role to drive compliance and standards in London. Bring the power of the elected office of Mayor to bear on the compliance of the Boroughs with the minimum expectations and standards to protect Londoners and the cities many visitors.</p>	
<p><u>Question 11:</u></p> <p>Are you content with the <i>Objectives</i> in the draft terms of reference for Sub Regional Resilience Groups (Annex H)?</p>	<p>YNO</p> <p>[Delete as appropriate. Add comments in box below]</p>
<p><u>Comments on Question 11:</u></p> <p>It's another talking shop.</p>	
<p><u>Question 12:</u></p> <p>Are you content with the <i>Membership</i> listed in the draft terms of reference for Sub-Regional Resilience Groups (Annex H)?</p>	<p>YES</p> <p>[Delete as appropriate. Add comments in box below]</p>
<p><u>Comments on Question 12:</u></p> <p>If 'others' includes key Emergency Managers (Planners) from critical components of the local infrastructure such as Hospitals, Stadiums, Major Transport Hubs.</p>	
<p><u>Question 13:</u></p> <p>How frequently should the Sub-Regional Resilience Groups meet?</p>	<p>Monthly</p> <p>[Delete as appropriate. Add comments in box below]</p>
<p><u>Comments on Question 13:</u></p> <p>Monthly Teleconference update with quarterly in person meetings would be appropriate if they were actually overseeing any projects of work rather than just a talking shop.</p>	
<p><b><u>London Fire and Emergency Planning Authority (LFEPA) and the work of the London</u></b></p>	

**Fire Brigade Emergency Planning Team (LFB-EP)**

**Question 14:**

**(For all responders and the London Fire Brigade)**

If the London Resilience Forum is established, are you content for Regulation 55 (a) to be removed? This is for LFEPA to take the lead responsibility for ensuring that Community Risk Registers are maintained.

*This will require a change to the Regulations (draft Regulations 6 at Annex E) and Chapter 9 of Emergency Preparedness (Annex F).*

NO

[Delete as appropriate. Add comments in box below]

**Comments on Question 14:**

Who, is going to do the work if the dedicated LFEPA members aren't At least LFEPA has some dedicated employees to carry out some EM work for London!

**Question 15:**

**(For all London local authorities and the London Fire Brigade)**

Are you content for Regulation 55 (b) to be removed? This is for LFEPA to take the lead responsibility for performing the duty to maintain local authority emergency plans in relation to pan-London emergencies.

*This will require a change to the Regulations (draft Regulations 6 at Annex E) and Chapter 9 of Emergency Preparedness (Annex F).*

NO

[Delete as appropriate. Add comments in box below]

**Comments on Question 15:**

In the absence of an Office of Emergency Management for London there still needs to be a body with staff that can do the work identified by the 'talking shops' of the LRRF / LRF's. If a London OEM is not forthcoming then LFEPA should be empowered as an audit / inspection body.

**Question 16:**

**(For all London local authorities and the London Fire Brigade)**

Are you content for Regulation 55 (c) to be removed? This is for LFEPA to assist local authorities in carrying out exercises and training for staff to ensure emergency plans are effective.

*This will require a change to the Regulations (draft Regulations 6 at Annex E) and Chapter 9 of Emergency Preparedness (Annex F).*

NO

[Add comments in box below]

**Comments on Question 16:**

As above, if LFEPA don't do it who will?

**Borough Resilience Forums**

**Question 17:**

Are you content for there to be a statutory requirement for certain Category 1 responders to co-operate through a Borough Resilience Forum?

*This will require a change to the Regulations (draft regulation 6 at*

YES

[Delete as appropriate. Add comments in box

<i>Annex E) and Chapter 9 of Emergency Preparedness (Annex F).</i>	below]
<u>Comments on Question 17:</u>	
<u>Question 18:</u> Which Category 1 responders should <u>not</u> be required to co-operate through a Borough Resilience Forum? <i>This will be detailed in the Regulations (draft regulation 6 – 56(4) at Annex E) and Chapter 9 of Emergency Preparedness (Annex F).</i>	Please list in box below with reasons.
<u>Comments on Question 18:</u>  NONE	
<u>Question 19:</u> Should Borough Resilience Forums produce risk registers and share them with neighbouring Borough Resilience Forums?	YES  [Delete as appropriate. Add comments in box below]
<u>Comments on question 19:</u>  In the absence of a dedicated OEM yes because who else will do this if they don't. The sharing of these risk registers is crucial in a number of places because of the interconnected risks, domino effects and interdependencies within the London transport, industrial and economic infrastructure	
<u>Question 20:</u> Should there be a statutory duty on responders who co-operate through a Borough Resilience Forum to produce a Borough Risk Register and share it with neighbouring BRFs? <i>This will require a change to the Regulations (draft regulations 6 – 56A at Annex E) and Chapter 9 of Emergency Preparedness (Annex F).</i>	YES  [Delete as appropriate. Add comments in box below]
<u>Comments on question 20:</u>	
<u>Question 21:</u> Are you content with the <i>Aims</i> in the draft terms of reference for Borough Resilience Forums (Annex I)? <i>The model terms of reference will be placed in an Annex to Chapter 9 of Emergency Preparedness.</i>	NO  [Delete as appropriate. Add comments in box below]
<u>Comments on Question 21:</u>  Another level of talking shops placing work upon individuals in organisations which place	

other priorities upon them.	
<u>Question 22:</u> Are you content with the <i>Objectives</i> in the draft terms of reference for Borough Resilience Forums (Annex I)?	NO  [Delete as appropriate. Add comments in box below]
<u>Comments on Question 22:</u>  As above	
<u>Question 23:</u> Are you content with the <i>Membership</i> requirements detailed in the draft terms of reference for Borough Resilience Forums (Annex I)?	YES [Delete as appropriate. Add comments in box below]
<u>Comments on Question 23:</u>  	
<u>Question 24:</u> If new Regulations establish Borough Resilience Forums, they will be required to meet at least every six months but may meet more frequently. How frequently should responders meet through Borough Resilience Forums (Annex I)? <i>More frequent meetings will not be defined in the Regulations.</i>	Monthly  [Delete as appropriate. Add comments in box below]
<u>Comments on Question 24:</u>  Monthly Teleconference update with quarterly in person meetings would be appropriate if they were actually overseeing any projects of work rather than just a talking shop.	
<b><u>Chapter 9 Emergency Planning Guidance – draft revision</u></b>	
<u>Question 25:</u> Are you content with the <i>Summary</i> in the revised draft chapter 9 of Emergency Preparedness (Annex F)?	YES  [Delete as appropriate. Add comments in box below]
<u>Comments on Question 25:</u>  They clearly describe the layers of talking shops as they are now and what is being proposed. It doesn't define any dedicated work force!	

<p><u>Question 26:</u></p> <p>Are you content with the Paragraphs 9.1 to 9.2 in the revised draft chapter 9 of Emergency Preparedness (Annex F)?</p>	<p>YES</p> <p>[Delete as appropriate. Add comments in box below]</p>
<p><u>Comments on Question 26:</u></p> <p>9.1 clearly identifies the need to think outside the box of the current structures and go down the route of a dedicated Office of Emergency management for London.</p>	
<p><u>Question 27a:</u></p> <p>Are you content with the section on the <i>London Resilience Forum</i> in the revised draft chapter 9 of Emergency Preparedness (Annex F)?</p>	<p>YES</p> <p>[Delete as appropriate. Add comments in box below]</p>
<p><u>Comments on Question 27a:</u></p>	
<p><u>Question 27b:</u></p> <p>Are you content with the section on the <i>Borough Resilience Forum</i> in the revised draft chapter 9 of Emergency Preparedness (Annex F)?</p>	<p>YES</p> <p>[Delete as appropriate. Add comments in box below]</p>
<p><u>Comments on Question 27b:</u></p>	
<p><u>Question 28:</u></p> <p>Are you content with the section on <i>the London Mayor</i> in the revised draft chapter 9 of Emergency Preparedness (Annex F)?</p>	<p>NO</p> <p>[Delete as appropriate. Add comments in box below]</p>
<p><u>Comments on Question 28:</u></p> <p>It should also support the Mayors establishment of a London OEM to get the work done and audit Borough compliance.</p>	
<p><b><u>Transition to Revised Regulations</u></b></p>	
<p><u>Question 29:</u></p>	

<p>What transition period should the revised Regulations provide for the London Resilience Forum to produce a risk register?</p>	<p>Other</p> <p>[Delete as appropriate. Add comments in box below]</p>
<p><u>Comments on Question 29:</u></p> <p>3 months would be enough with current risk registers if they had a dedicated staff to do it. They will probably need longer though in the current structure.</p>	
<p><u>Question 30:</u></p> <p>Please tell us if you think a transition period is needed to implement the proposed changes to the regulations and guidance. If, 'yes' then please describe what practical changes will be needed to support implementation and how long you think these may take.</p>	<p>YES: Other</p> <p>[Delete as appropriate. Add comments in box below]</p>
<p><u>Comments on Question 30:</u></p> <p>We think that a total restructuring is needed to support our central belief that London should have a dedicated Office of Emergency Management.</p>	
<p><b><u>Impact Assessment</u></b></p>	
<p><u>Question 31:</u></p> <p>Are you content with page one of the initial Impact Assessment (Annex I)? <b>(J)</b></p> <p><i>The purpose of the Impact Assessment is explained in paragraphs 87 &amp; 88 of the consultation paper.</i></p>	<p>NO</p> <p>[Delete as appropriate. Add comments in box below]</p>
<p><u>Comments on Question 31:</u></p> <p>A fourth option as outlined by our thoughts on this should be included, namely the establishment of a London Office of Emergency Management under the office of Mayor to deliver the Comprehensive Emergency Management Programme for London and oversee the application of the 'resilience' programme at Borough level.</p>	
<p><u>Question 32:</u></p> <p>For the proposed policy option in the Impact Assessment (option 3), please tell us if there are any one off or annual costs to your organisation.</p>	<p>Refer to 'Costs' section on page 2 of the Regulatory Impact Assessment template. Please provide monetised costs and a description.</p>
<p><u>Comments on Question 32:</u></p>	

No we represent practitioners and are a not for profit association.

Question 33:

For the proposed policy option in the Impact Assessment (option 3), please tell us if there are any one off or annual *savings* to your organisation.

Refer to 'Savings' section on page 2 of the Regulatory Impact Assessment template. Please provide monetised savings and a description.

Comments on Question 33:

Note above

Question 34:

For the proposed policy option in the Impact Assessment (option 3), please tell us if you know of any considerations which should be taken into account for the specific impact tests.  
*Full list shown on the final page of the Impact Assessment*

Please comment in the box below.

Comments on Question 34:

**Other Comments on the consultation paper: *Renewing Civil Contingencies Act Arrangements for London***

(Please use a separate line for each detailed issue that you think needs to be addressed, adding more rows as necessary)

<b>Paragraph number</b>	<b>Comments</b>

**Thank you for your input into this consultation.**