

Andy Roe
London Fire Commissioner
London Fire Brigade

12 February 2021

Dear Andy,

LONDON FIRE BRIGADE: PROGRESS AGAINST CAUSE OF CONCERN

As part of our inspection of what progress London Fire Brigade is making to implement the recommendations in the Grenfell Tower Inquiry's Phase 1 report, we also considered your progress to address the cause of concern we gave in our Round 1 inspection. This letter summarises our autumn 2020 inspection's findings.

Background

2. In July 2019, we identified a cause of concern that:

- (a) The brigade had a significant backlog of training for staff on risk-critical skills such as emergency fire engine driving and incident command.
- (b) Some drivers of emergency vehicles hadn't had refresher training for up to 20 years, despite national guidance recommending this be provided every 3 to 5 years. While the brigade had started to address this, it couldn't say when enough training would be provided.
- (c) New incident commanders didn't get the training they needed for the role until after they had taken up an incident command role and had begun to command real incidents. In some cases, this wasn't until up to a year later. We also found examples of firefighters acting up as level 1 incident commanders who had received no training or assessment.
- (d) The brigade hadn't been providing regular incident command training and re-assessment so that staff have up-to-date knowledge, skills and understanding and can continue to command at a competent and safe standard. National Operational Guidance says this should happen every two years. Refresher training was only available for levels 1 and 2 commanders (supervisory and middle managers) and wasn't a formal re-assessment of command competence (staff couldn't fail for poor performance and would therefore return to command real incidents). Training for level 3 commanders (deputy assistant commissioner, assistant commissioner) wasn't always in place,

although the brigade was developing a package to address this. No work had begun for level 4 training (deputy commissioner and above).

3. The brigade submitted an action plan on 28 February 2020 setting out how it planned to address our cause of concern. We reviewed the brigade's progress as part of our wider inspection into how it is responding to the recommendations in the Grenfell Tower Inquiry's Phase 1 report. Because of the Covid-19 pandemic restrictions at the time of our inspection, we conducted this inspection entirely virtually between August and December 2020.

4. During the inspection we reviewed documents, data and training records. We also interviewed staff responsible for implementing the action plan and staff who are expected to undertake risk-critical training. This included you as the commissioner of London Fire Brigade. At the end of the inspection, we gave feedback on our findings to you and your senior management team.

Action plan

5. The brigade has created an action plan to address our cause of concern. This is part of a main action plan to manage and monitor progress against the recommendations in the Grenfell Tower Inquiry's Phase 1 report and the areas for improvement identified in our 2019 inspection. The main action plan is a spreadsheet showing deadlines and action owners. There are no senior responsible owners listed.

Governance

6. The brigade is putting in place better arrangements for its improvement work. But it needs to improve how it manages its different work plans to bring the greatest benefit to public safety. The way the brigade monitors progress and manages risks is inconsistent and there is significant overlap between different areas of work. Our report [Inspection of the London Fire Brigade's progress to implement the recommendations from the Grenfell Tower Inquiry's Phase 1 report](#) gives more information about the brigade's governance arrangements.

Emergency driving

7. The brigade has made training in emergency driving a priority. We recognise the significant improvements that have been made since our first inspection. The number of training courses provided to staff has increased. Training now includes an assessment (revalidation) process, with priority given to fire engine drivers.

8. At the time of our revisit, data provided by the brigade showed that the percentage of staff up to date in their training and assessment for emergency fire engine driving had increased from 68 percent (1,384 of 2,023) in November 2019 to 96 percent (1,642 of 1,711) in December 2020. The percentage point improvement had been helped by the number of eligible drivers needing training having reduced by 312. The percentage of staff up to date in their training and assessment for emergency car driving had also increased from 58 percent (184 of 318) in November 2019 to

82 percent (239 of 290) in December 2020. The number of eligible drivers needing this training also reduced (by 28). The brigade stated that all staff will be up to date with their training and assessment for emergency car driving by January 2021 and emergency fire engine driving by March 2021. This is encouraging.

9. Staff recognise the action being taken by the brigade to improve. The brigade also recognises the need to do more to evaluate the impact of this training, such as whether it has reduced the number of staff involved in road traffic collisions.

Incident command

10. The brigade has made the competence of its incident commanders a priority and has allocated more staff to work with the training provider to design new courses. Staff told us that the relationship with the training provider has improved, and there is now a more collaborative approach.

11. The brigade now has an ambitious training strategy. It outlines a planned approach to train, assess and provide assurance of incident commanders' skills before they take on a new role. It also sets out a planned approach for the continuing development and assessment of their skills.

12. But the brigade's strategy will take several years to put in place and some parts aren't yet fully funded. We are concerned that the percentage of eligible levels 1 and 2 commanders assessed as competent is lower than in 2018. Incident command training and the assessment of competence remain risks for the brigade.

13. Overall, the brigade hasn't made enough progress to resolve the cause of concern we identified during our 2019 inspection. The brigade should make sure that levels 1 and 2 incident commanders get the right training and that their competence is assessed as soon as possible.

Levels 1 and 2 training

14. A new training course for level 1 incident commanders (leading fire fighter, sub-officer and station officer) is being developed. This course includes what was learned from the Grenfell Tower incident and revised or new working practices. The brigade is testing the course and plans to implement it during 2021.

15. A skills maintenance course for level 2 commanders has been redesigned and tested. The brigade also plans to redesign the course for new level 2 incident commanders (station commander and group commander). But this won't be completed until the level 1 course has been developed. This is because there are only a few course designers available and they have been allocated to complete the level 1 course design first. We were told that this is delaying these courses being ready.

16. Until these new courses are available, the brigade is using its contracted supplier or other external providers to provide incident command training.

17. The brigade has also introduced a risk assessment process for all firefighters who wish to take on level 1 incident command duties temporarily. In 2020, the brigade prioritised funding for these staff to get incident command training from a different external provider because its contracted supplier didn't have capacity. Those who were unable to receive training in 2020 have courses booked for early 2021.

18. The brigade still isn't training all its commanders quickly enough. More commanders are eligible for training now and the brigade can't keep up with the growth in demand.

19. Data that you gave us shows that by 4 December 2020, 271 more level 1 commanders had been trained and assessed than at 1 October 2018. But because the numbers eligible had increased from 804 to 1,497, this represents a decrease of 24 percentage points, from 90 percent to 66 percent. It also shows that 35 percent (71 of 205) of level 2 commanders had been trained and assessed compared with 90 percent (163 of 182) for the same period. The numbers of level 2 commanders assessed as fully competent has also decreased.

Levels 3 and 4 training

20. Our 2019 inspection found that there was only limited incident command training for levels 3 and 4 commanders (deputy assistant commissioner and above). The brigade has since funded external training for staff at these levels. At the time of our inspection, data provided by the brigade showed that 96 percent (24 of 25) of levels 3 and 4 incident commanders have been trained and assessed. This is a marked improvement.

Skills maintenance

21. The brigade has started assessing the continuing competence of incident commanders, a process it calls revalidation. National guidance advises that this should happen every two years, and include refresher training and an assessment. Our 2019 inspection found that no effective assessment process was in place.

22. We found that progress has been slow. At the time of our inspection, data provided by the brigade showed that only 328 level 1 and 17 level 2 incident commanders had completed an individual assessment during 2020. The data shows that, despite meeting the minimum standard, 41 percent of the level 2 commanders who were reassessed were put on a personal development plan to improve their competence. Only a few brigade staff have the skills to carry out assessments, and we were told that this causes delays in assessments.

Conclusion

23. We are encouraged by the brigade's efforts to make risk-critical training a priority since our last inspection. It is pleasing that more staff are up to date with their training and assessment for emergency fire engine and car driving. We also welcome the improvements made to incident command training for levels 3 and 4 commanders.

24. However, despite these improvements, incident command training and assessing competence remain risks. The brigade has made the competence of its incident commanders a priority. But there needs to be greater focus on providing levels 1 and 2 commanders with the training they need now. The planned improvements will take time to introduce. And some plans have already been delayed because there aren't enough staff with the right skills.

25. The brigade has allocated more staff to work with its training provider to design new courses. It has started developing new training courses for levels 1 and 2 incident commanders. But the limited number of staff able to design these courses is causing delays.

26. Meanwhile, the brigade has funded extra courses from external training providers. But we are concerned that the percentage of levels 1 and 2 commanders assessed as competent has decreased since 2018.

27. The brigade has started to introduce individual assessments for incident commanders like those in place in other fire and rescue services. Only a few brigade staff have the skills to carry out assessments, which is causing delays.

28. The brigade is putting in place better arrangements for taking forward its improvement work. But there is more work to do.

29. Overall, the brigade hasn't made enough progress to resolve the cause of concern we identified during our 2019 inspection. We will continue to monitor progress through updates from the brigade and data returns. We will revisit the brigade in summer 2021 to consider what further progress you have made against your action plan.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'M Parr', with a long horizontal line extending to the right from the end of the signature.

Matt Parr

Her Majesty's Inspector of Constabulary

Her Majesty's Inspector of Fire & Rescue Services