

Ron Dobson CBE QFSM FIFireE
London Fire Commissioner

Her Honour Frances Kirkham CBE
Assistant Deputy Coroner
Inner Southern District of Greater London
The Coroner's Court
1 Tennis Street
London SE1 1YD

London Fire Brigade is run by the London
Fire and Emergency Planning Authority

Date 23 May 2013

Dear Coroner,

Response to the Coroner's Report under Rule 43 of the Coroner's Rules 1984

Following the inquests into the deaths of Catherine Hickman, Dayana Francisquini, Thais Francisquini, Felipe Francisquini Cervi, Helen Udoaka and Michelle Udoaka and your subsequent Rule 43 Report dated 28 March 2013, I write to advise you of the actions that the London Fire Brigade ('the Brigade') will be taking with regards to the recommendations that you have made.

I am grateful to note that you have acknowledged the work that the Brigade has specifically undertaken since the Lakanal House fire, including a review of the following:

- guidance to crews making risk assessments for sites in their area;
- guidance as to matters which should be noted by crews making; familiarisation visits and visits pursuant to section 7(2)(d) Fire and Rescue Services Act 2004, including the gathering of information regarding flats or maisonettes with unusual layouts;
- arrangements for access and the use of aerial ladder platforms and other specialist vehicles;
- cooperation with three London Boroughs to develop a pilot scheme for the provision of "premises information plates" at buildings;
- procedures for moving a bridgehead;
- communication between Brigade Control and those at an incident;
- new guidance as to the handling of fire survival calls and refresher training for officers dealing with such calls; and
- introduction of forward information boards.

In addition to the above the Brigade has also introduced new initiatives, policies and equipment covering the following:

- mobile data terminals;
- search and rescue policy;
- compartmentation fire-fighting policy;
- improved fire-fighting branches;

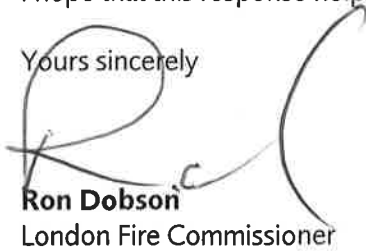
- procurement of insulated wire cutters for issue to all breathing apparatus sets;
- improved breathing apparatus sets;
- improved breathing apparatus control boards incorporating telemetry capability (allowing the breathing apparatus set to communicate with the breathing apparatus entry control board automatically).

Your Rule 43 Report makes 5 recommendations and I have set out below the Brigade's response to each recommendation.

We will audit the progress of the proposed actions through an action plan which will be overseen and reviewed by the Brigade's existing Operations Directorate Coordination Board.

I hope that this response helps to assure you of the Brigade's commitment to continuous improvement.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ron Dobson', with a large, sweeping flourish extending to the right.

Ron Dobson
London Fire Commissioner

RECOMMENDATION 1

"A number of former residents of Lakanal House gave evidence. There was little awareness of fire safety advice published by London Fire Brigade, whether through leaflets, the website or home fire safety visits. Residents of high rise residential buildings need to be aware of the dangers associated with fire in such buildings and to have a clear understanding of what they should do in case of fire. Whilst this is a matter which concerns housing providers, it is recommended that your Brigade also consider how to improve dissemination of fire safety information to achieve effective communication with residents of such buildings."

Response

Community safety initiatives already cover a wide range of community engagement activities, including Estate Days and Home Fire Safety Visits. In this regard, it is important to note that the Brigade's statutory powers of enforcement extend only to the common parts of residential premises so that any fire safety initiatives which impact upon private dwellings can be advisory in nature only.

However, the Brigade's Regulatory Fire Safety Department advises registered social landlords about the information that is available from the LFB website and through various fire safety publications. These contain information on how to prepare for the eventuality of fire and evacuation and the actions to be taken in the event of fire. This approach is strengthened and augmented through on-going liaison with representative bodies of housing managers/providers such as the Association of Residential Managing Agents (ARMA), Association of Residential Letting Agents (ARLA) and the National Landlords Association (NLA). This liaison includes providing advice on evacuation strategies of buildings and how housing providers can offer appropriate and consistent advice.

Proposed Action

The Brigade is keen to extend its effectiveness in the dissemination of fire safety advice to residents in high rise buildings. In order to ensure that the knowledge and awareness that is already delivered is as effective as possible the Brigade proposes to:

- Explore how the Brigade will work with partners to communicate a consistent fire safety message and deliver advice, including establishing a Fire Safety High Rise Forum with key partners such as London Councils, London Boroughs, Housing Associations and care providers. The scope of the new Fire Safety Forum for high rise residential premises will cover both the private and public sector. This will enable the Brigade to clarify fire safety messages and procedures for evacuation in high rise blocks. Through this forum the Brigade would also encourage building owners/managers to put up fire safety information/ boards/ posters inside the doors of individual flats where practicable. The Brigade notes the recommendations made by the Coroner to other interested parties and feels that this Forum could also be used to explore the possibility of leading a marketing communications campaign, with key partners, aimed specifically at residents living in high rise buildings and purpose built flats;
- Review existing information and where necessary, develop a tailored set of publications aimed at high rise residential dwellers to clarify and reinforce the specific information concerning advice to "stay in place" and its relationship with more generic "get out, stay out" advice. The Brigade will work with the Department for Communities and Local Government to ensure consistency of this advice from both a local and national perspective.

Time Scale

The Forum will be established by the end of August 2013.

RECOMMENDATION 2

"I note that the Brigade now has guidance as to how such visits should be conducted and the type of information which crews should gather. As you recognise, "gathering of operational knowledge has little value unless it can be stored, disseminated, accessed and updated when most needed i.e. at incidents when the use can save valuable time and inform critical command decisions."

It is recommended that the Brigade review procedures for sharing information gained as a result of section 7(2)(d), familiarisation and home fire safety visits with crews both within the station in question and at other local stations".

Response

The Brigade's policies concerning the "gathering of operational knowledge" are under regular review and many have been modified to reflect the lessons learned in the Lakanal House fire.

Proposed Action

To further enhance current systems, the Brigade will:

- Undertake a review of the existing policy relating to information gathering and contingency plans. This review will aim to optimise all of the Brigade's pre-planning activities to ensure the effective sharing of information gained as a result of section 7(2)(d) familiarisation and Home Fire Safety Visits. It will aim to maximise the use and availability of this information when operational personnel respond to emergencies;
- Create an inspection regime that targets high priority residential and non residential buildings with a view to increasing the number of premises records which are available to the Brigade's operational staff on the Operational Risk database;
- Develop guidance to assist staff to create consistent tactical plans focused on improving speed of firefighting and life saving interventions;
- Develop a new policy guidance to address known outstanding risks identified through the Brigade's Home Fire Safety Visits and other engagement activities;
- Establish a corporate mechanism by which targets for the Brigade's 7(2)(d) activities are set.

Time Scale

This work has already commenced and is estimated to be completed by December 2013.

RECOMMENDATION 3

"During the Lakanal House fire there were 6 changes of Incident Commander with some serving as IC for brief periods.

It is recommended that the Brigade review its policies and procedures concerning incident command, having regard to whether it is effective for the choice of the IC to be tied closely to the number or type of appliances attending an incident and the effectiveness of a policy which may result in rapid and frequent changes of IC.

It is also recommended that consideration be given to training of ICs and potential ICs to enhance their performance in relation to the following:

1. Use of the Dynamic Risk Management model and other management tools to enable ICs to analyse a situation, and to recognise and react quickly to changing circumstances.
2. To recognise when to escalate attendance by more experienced ICs.
3. To anticipate that a fire might behave in a manner inconsistent with the compartmentation principle.
4. To be aware of the risks to those above and adjacent to the fire flat.
5. Handover from one IC to the next and effective deployment of outgoing ICs.
6. The collection of information from all possible sources.
7. Use of methodical search patterns".

Response

The Brigade has reviewed its policies and procedures concerning incident command in respect of the 7 points identified in this recommendation with particular regard to the potential for rapid and frequent changes of IC. For the reasons explained by the Commissioner of the London Fire Brigade in his evidence to the Inquests, the Brigade believes that the current guidance remains effective and provides sufficient flexibility for the monitoring officer at the scene or the remote monitoring officer to attend and take over command of the incident before the trigger point of the number of appliances is reached.

Proposed Action

The Brigade proposes to implement the recommendations from its internal report entitled "**Review of Incident Command and Support Levels**" which recommends the increase of the span of control at operational incidents for officers at the level of Group Manager (GM), Deputy Assistant Commissioner (DAC) and Assistant Commissioner (AC). The span of control for four and six pump fires was seen as commensurate with the roles of Watch Manager and Station Manager respectively. The proposed increase of spans of control are as follows:

- The expansion in levels of responsibility for GM is from 7 to 8 pumps to 7 to 10 pumps
- The expansion in levels of responsibility for DAC is from 9 to 12 pumps to 11 to 15 pumps
- The expansion in levels of responsibility for AC is from 13+ to 16+ pumps

The increase in responsibility levels will reduce the number of handovers at the larger more complex incidents. All the individuals that will be affected by these changes have been assessed and receive on-going incident command training to ensure that they continue to maintain the appropriate skill levels to deal with this enhanced level of responsibility.

The Brigade will engage with its training contractor to ensure that the 7 points identified in this recommendation are embedded within the current incident command training. The Brigade will ensure that these issues are further considered as part of the current review process of incident command training, which is being undertaken with the Brigade's training contractor. This work will aim to ensure that the training provided enhances performance across the range of required skills and knowledge needed to support effective incident command.

The Brigade will also introduce a case study training package which will incorporate the learning outcomes from the Lakanal House fire and from other high profile high rise incidents such as Shirley Towers (Hampshire) and Harrow Court (Hertfordshire).

Time Scale

This work has already commenced and is estimated to be completed by December 2013.

RECOMMENDATION 4

"I note the steps already taken by the Brigade in relation to guidance to and training for those at Brigade Control who are involved in handling calls from members of the public, and fire survival guidance calls in particular. It is recommended that the Brigade considers whether training be given to operational crews about Brigade Control practices and procedures."

Response

As acknowledged the Brigade has introduced new guidance as to the handling of fire survival calls and this includes guidance for operational crews about Brigade Control practices and procedures.

Proposed Action

In light of this recommendation, the Brigade has further examined the extent to which operational staff may be made aware of Brigade Control practices and procedures. As a consequence, it is proposed that:

- All operational staff will have training in Brigade Control practices and procedures delivered through a new training solution. This will include four annual training exercises.

Time Scale

Work on developing a new training solution relating to Brigade Control practices and procedures has already commenced and it is expected that all operational staff will have completed this training by March 2014. The first of the themed exercises involving the exchange of information between Brigade Control and operational staff was held in December 2012. A programme of future exercises has been established for 2013.

RECOMMENDATION 5

"It is recommended that the Brigade consider whether it would be beneficial to use additional breathing apparatus radio communications channels and personal radio channels at major incidents to reduce the amount of traffic on each channel".

Response

At present, the Brigade has the capability to use multiple radio channels. In practice, the number of channels which are utilised are controlled and limited for operational reasons. In light of this recommendation, the Brigade has considered whether it would be beneficial to use additional breathing apparatus (BA) radio communications channels at major incidents to reduce the amount of traffic on each channel.

The use of a single BA radio channel allows for the safe monitoring and overview of risk critical, safety critical and general information to and from BA teams. The use of separate channels would make it more difficult to maintain this complete overview and may result in a delay in exchanging critical information. For example, by using a single channel, the transmission of risk critical information relating to a phased or emergency evacuation of a BA crew can be heard and appropriate action taken by all concerned.

Multiple channel use could also lead to a lack of co-ordination between teams and increase the risk that the fire-fighting actions of a team on one channel might adversely affect teams on another.

The need to pass information across multiple channels may negate any perceived benefit because of the requirement to re-transmit all relevant information across the channels in use. The result would be to reduce the amount of radio capacity and create further possibilities for duplication and confusion.

Since the Lakanal House fire, the Brigade has introduced a BA telemetry capability which has reduced the amount of BA radio communication which is required at incidents. This has been achieved through the use of new BA Entry Control Boards which allow for a greater degree of automated monitoring and supervision of BA wearers, with the result that Entry Control Officers no longer need to check gauge readings with wearers by radio. This new technology has therefore further increased capacity when using a single BA radio channel and reduced the risk of congestion.

In summary, having carefully considered the recommendation, the Brigade is firmly of the view that the risks associated with using more than one BA channel during an incident would outweigh the benefits that this operational practice would afford.

Proposed Action

While, for the reasons given above, the Brigade respectfully argues against a change in procedure concerning the use of multiple BA channels, it will be taking the following action to address the lessons learned from the Lakanal House fire:

- The Brigade will engage with its training contractor to ensure that issues relating to incident communications are embedded within the current operational training.

Time Scale

This work has already commenced and is estimated to be completed by December 2013.