

Emergency Planning Society (EPS) – Written evidence (RSK0088)

About Us

Since its creation in 1993, **The Emergency Planning Society** has become a driving force in the world of resilience, working with members to develop professional standards to enhance and promote the profession.

Through regular consultation with Government and other authoritative bodies, we provide a voice for our members to influence change at the highest level.

Our members are from a wide range of sectors; public, private, business, education, research/academia, security, voluntary and from the communities we serve. (This list is not exhaustive)

Our vision and purpose:

We are the leading voice of the resilience profession.

We define and underpin the "Body of Knowledge" through professional practice, education, competences, standards, research, and the production of a learning landscape that provides a pathway to have trained, skilled and competent members enabling them to be "match fit" and "fit to practice".

Our Submission

The content of this submission is based on feedback from our members via a survey. In addition, information which has been shared through our various networking sessions which continue to be held frequently and specifically in support of our members during their ongoing response to the global pandemic. Our submission is written in the spirit of raising the challenges, without apportioning blame. The call for evidence must be submitted with honesty and integrity, whilst recognising the sensitivities of highlighting areas for improvement across Governments and responding agencies.

Key themes emerging are **leadership, competence, resources, investment, concurrency and complexities of risks, decision making, accountability, whole systems approach, assessment of current harms and inequalities, learning so as to influence the futures thinking, rehearsing, performing, co-ordination and communication.**

We seek strategic and holistic change and assurance to invest in the profession. There must be recognition and commitment to learn from the magnitude of lessons from inquiries, reports, debriefs and research. Wicked problems will continue to emerge and re-emerge if we continue to repeat the same mistakes time and time again, and yet expect different results; or the worst is yet to come (Kettl 2008). We must look to new horizons and *build back better*.

Our profession demands change; our world demands change; our people deserve change.

1. What are the most significant extreme risks that the UK faces? Are these kinds of risks discrete, linked, or systemic? What do you understand the term 'extreme risk' to mean?

- 1.1** Complex inter-related risks with multi-faceted impacts, some of which are not obvious and aligned to interdependencies and harms. The global pandemic has provided examples of this through, longer term impacts on social, health, economic, psychological, and environmental aspects. Increasing demands on already broken systems. Issues of inequalities and social deprivation continue to be more prevalent.
- 1.2** Significant long-term risk to social capital and social cohesion.
- 1.3** Climate change - the alignment to global poverty, public health, economy, political, policy and leadership, international relationships, serious organised crime, security breaches, terrorism all of which can be related to the wider risks and emergencies that are ever more prevalent in our world in 21st century. The complexities must be considered in the wider context.
- 1.4** Concurrent events - increasing prevalence of two or more incidents happening at the same time. This is an increasing trend, and we must consider the impacts and consequences.
- 1.5** Systemic failures leading to extreme risk – examples of this in personal protective equipment supply, leading to personal health risks to staff, and vulnerable people and risk of death through contracting Covid19. Grenfell is also another example of systemic failures leading to the catastrophic loss of life.
- 1.6** The National Risk Assessment although detailed in narrative, lacks the integration across the whole system. Concurrent risks must be considered. The risk profiles do not transfer to investment in being able to prepare adequately across the sectors. There is an apparent disconnect at Government levels to grasp and understand the complexities of emergency management and all that it encompasses.

2. Are there types of risks to which the UK is particularly vulnerable or for which it is poorly prepared? What are the reasons for this?

- 2.1** The pandemic has outlined several key areas of vulnerability. Much of it already evident in our overloaded systems, yet, they have been largely underfunded, and expected to perform miracles, and step up to government directives with little or no regard to delivery or relevance at local level. National initiatives implemented without due regard to the 'how, why, where or when' or long-term need and sustainability.

- 2.2 The resilience/emergency management profession is extremely vulnerable. Lack of investment, resource, and funding. There must be a root and branch review, investment, and recognition at the highest level of the expertise and specialists that make it all happen; they continue to rise to the challenges. It is not sustainable in the longer term.
- 2.3 Supply chains are vulnerable and more so with the EU exit implications. Interdependencies and reliance on the same supply chains has been evident through the pandemic, with many using procurement routes which put all the "eggs in one basket" – ref 1.5.
- 2.4 Everything we do has the potential to have disruptors. We cannot continue to identify vulnerabilities without investing and preparing adequately. The pandemic has highlighted extreme flaws in our systems, i.e. responder agencies have heard government announcements at the same time as members of the public, often late in the evening with an expectation of delivery the following day. This shows a complete lack of knowledge and understanding of dealing with emergencies and the importance of situational awareness and communication. Existing structures have been largely ignored.
- 2.5 The risk associated with buildings made with Reinforced Autoclaved Aerated Concrete (RAAC) has been highlighted through some statutory authorities, however is not on the national risk register or does not appear to be addressed along with the cladding issue at national government levels. Most of the buildings that contain these materials are education establishments, hospitals and community halls. The loss of these buildings from collapse would not only be significant as far as loss of life, but to the CNI. We must address this; risks identified to that of Grenfell should never happen again.

3 How could the Government's approach to risk assessment be strengthened to ensure that it is rigorous, wide-ranging, and consistent? Your answer could refer to any aspect of the risk assessment process including, for example, its governance, the evidence base, or the degree to which it is open to scrutiny and the input of experts.

- 3.1 The national risk assessment must consider local principles. It must also consider the wider elements of competence which includes not only science and modelling, oriented to addressing critical elements learned from this pandemic and the focus on the impact on our citizens.
- 3.2 Government is reluctant to interpret national risk at the regional level, and regional risk at local level. In the reality of delivery, everything is local, therefore, national risk, strategic objectives, and planning assumptions are not interpreted at each descending level,

therefore the response for rural communities is based on the risk determined for London.

- 3.3** There needs to be investment in the resilience emergency divisions right across the heart of government. This should not be civil servants without the right knowledge, skills, qualifications, and experience, rather it is drawn from the profession. This also applies to the office of the Prime Minister and other senior Cabinet Members.
 - 3.4** To move away from risk owners to impact owners in the risk planning process. The current pandemic has impacted a range of sectors, including education and the economy. Impacts should be developed by experts and risk assessments less driven by cause. This should also specifically address areas most at risk from already known harms.
 - 3.5** The government should ensure that the input of external experts is utilised rather than it being an internal approach and dissemination. There should also be consideration of a wholesale review in the evidence base utilised by the government in relation to its risk assessments. (going beyond mere probabilities and look at actual incidents occurring in a set time frame and beyond)
 - 3.6** Every expert panel should contain a professionally qualified emergency planner who can challenge the cultural norms or notional starting points for every discussion
- 4. Given the range of possible national risks, and the need to achieve a balance between efficiency and resilience, what level of assurance should the Government be seeking on the UK's resilience to hazards? What would effective national risk management achieve, and how could its success be measured?**
- 4.1** This must be a balance of standards, competence, and compliance; relevant across all levels and adopting an all risks approach. There are a range of standards in place, guidance, and doctrine, however, the landscape is cluttered. There is confusion on what to adopt and use. There are also gaps in how we consider the wider harms and societal approaches; we need to build much more of this into our assessments. We must consider our standards, our benchmarking, and the competence to assess accordingly.
 - 4.2** Identification of lessons is fundamental, yet, despite decades of disasters, we seem to have the same issues occurring time and time again; we identify, we don't learn, we don't apply. If we did, we would be in a different position now. An all systems approach must be about people; the balance of science, alongside understanding the wider impact and consequences of actions. Do we admit our mistakes, or are we stuck in the litigation cycle of blame, that means liability is more prevalent?

4.3 Governments should be aiming more toward the resilience end of the balance rather than efficiency. A high level of assurance is needed for local and national responders, with the focus potentially to move from a single risk register to sector/risk type specific documentation, with the ability then to provide more rigour.

4.4 We cannot be efficient without adequate resource. Investment is needed. Working smarter not harder. The emergency services, NHS and local authorities have had years of austerity, and cannot sustain current service level models, never mind dealing with incidents and emergencies. The reactive approach of government to Covid19 is indicative of the culture of doing to..... not with. How do we best work together to achieve the right outcomes? We have recognised structures, communications, and co-ordination, yet much of this continues to be ignored nationally.

5. How can the Government ensure that it identifies and considers as wide a range of risks as possible? What risks does the inclusion criteria for the National Security Risk Assessment exclude and what effect does this have on long-term resilience?

5.1 The National Security Strategy and Strategic Defence and Security Review 2015 was published by the British Government on 23 November 2015 outlining the United Kingdom's defence strategy up to 2025. It identifies key threats to the UK and the capabilities required to address them. Do we have the capabilities? When did we last review? The document is out of date, does not fully embrace the current environment, nor is it inclusive of recent threats and EU Exit.

The lack of trust across sectors in accessibility and sharing of security documents continues to be unacceptable. This is ad hoc across the country, whether staff are security cleared or not. There cannot be a full understanding of the threats and hazards unless sighted on the issues. Planning therefore has gaps at the outset. This also means we perhaps do not fully plan for the incidents which are more likely at local level. Putting our eggs in one basket, will leave us vulnerable in other areas. The longer-term issues have been covered in earlier questions.

5.2 The All - Hazards approach by the UN Sendai agreement represents good and leading practice, yet we have not adopted this within the UK. The principles are robust. There are also good examples in Australia and New Zealand in their emergency management frameworks, and within the Scandinavian countries.

5.3 Greater use of the profession and experts/practitioners in advising politicians and civil servants.

6. How effectively do current ways of characterising risks (for example, the use of a five-point scoring system of a 'reasonable

**worst-case scenario') support evidence-based policy decisions?
What other information would be useful?**

- 6.1** A five-point scoring system is one part of the wider assessment. We need to move away from "scoring" and reasonable worst-case scenarios to benchmarking based on knowns and unknowns. The five-point system becomes subjective as interpretation is placed upon the scores when looking at the explanations and scores move up or down. The context is important, too many of the risks use London as the example impact rather than talk in terms of scales of impact and resources available. There is not enough consideration of mitigation in risk reduction. There is also no wider assessment of concurrency of risks.
- 6.2** Politics create challenges and must be removed from the process. Integrity on our data and intelligence without political bias is important. Research tells us politics and leadership in a crisis must be separated.
- 6.3** There is a lack of cohesive strategy to deliver an all risks approach. There are also challenges across the four nations to have consistency. The proposal to have national, regional, and local assessments, applicable to specific and concurrent issues is preferable.
- 6.4** We must learn from the pandemic. We must consider the story board of planning and preparation, against the delivery of response, interdependencies, impacts and consequences. A Pandemic was deemed the greatest risk, yet a review would show a lack of diligence in the prevention, planning, resourcing and the full rehearsing of plans and capacities. There has been a lack of action and progress on the learning from Exercise Cygnus and Silver Swan, leaving the UK extremely vulnerable.

Local response has worked well.

7. How effectively do Departments mitigate risks? Does the Risk Assessment process and the Civil Contingencies Secretariat adequately support Government departments to address risks within their remits? Is further oversight or accountability required, and if so, what form should that take?

- 7.1** The response to Covid19 has identified several challenges. The four nations approach, the lack of co-ordination across government depts and within SAGE. The role of CCS, and their equivalents in the other nations must be reviewed and identify areas for improvement. Many are already evident. Leadership and competence in senior leaders in governments must improve. There must be accountability, which is not about politics, rather the competence to deliver effective leadership in an emergency. We must be able to have honest conversations (which are not about

blame) on roles, responsibilities, accountabilities, and the decisions that have been undertaken.

7.2 CCS has a competence framework is in place for civil servants. However, there must be independent scrutiny and alignment to the wider resilience agenda.

7.3 Government departments should be required to provide justification statements alongside decisions made. This should include the name of the civil servant signing off policy, not just the current Government Minister. This would allow scrutiny of the Civil Service who drive policy and allow for patterns to be recognised. Publication of decisions which have not been put into policy should also be considered to allow academic debate into these.

8. How well are national contingency plans communicated to and understood by those at a local level, including emergency responders? What could be changed to increase the capability of local responders to effectively plan for and respond to emergencies?

8.1 A National Plan relates to the UK; the subsequent regional plans are subservient to the national plan and don't need to include the same information (even as a reference), the subservient (to regional) local plans follow the same process. Each layer extracts down and only includes information relevant to that layer, and any tasks that are passed down to the next layer. Each organisation should be independently tested on its ability to deliver its own plan, and how it inter-relates to plans above/below. However, there can be challenges if a national plan has not fully considered the scope of what is needed regionally and locally. They should all connect.

8.2 The removal of the Regional Resilience Teams left a capability gap. Regions are beginning to re-engage and connect with responders. Each team needs to have a member allocated to a risk or department to act as an interface between local and national. To brief on policy, oversee planning and exercises and assess competence of each of their LRF/LRPs. There are differences across the four nations, and as an example within Scotland there are regional teams which are well established and who engage locally and nationally and are integrated and aligned across the whole system and this works well.

8.3 Broadly, guidance is well understood at local level. Often there are questions at local level on the nuances of the guidance which can go unanswered nationally. The biggest perceived issue in 2020 was NOT referring to existing plans and improvising a response. There is huge variation across the UK for the implementation of national

policies at a local level. There needs to be a common process applied at all locations and levels within the UK. Even terminology is different.

8.4 LRF/LRPs are member responder organisations, trying to support and co-ordinate activity. There is little time or budget to properly train. In addition, there is a view from CCS and governments that the Emergency Planning College will be utilised as a Centre of Excellence, but this is seen as cost prohibitive and run by Serco for commercial profit and gain. Responders need access to training which is low or no cost. The Scottish model through the Scottish Resilience Development Service (ScoRDS) works well, with courses developed to meet the needs of responders at no cost. Funding is provided centrally. It is worth noting there is a plethora of contractors who can provide training and exercising. The challenge is their competence to do so and against recognised standards. Who is monitoring?

8.5 Leadership, co-ordination, legislation, and ownership at a National level. If you don't provide and enforce guidance, people will create their own agendas and do their own thing. the Civil Contingencies Act 2004 is long overdue a refresh, as are the supporting regulations, a doctrine. A review must consider elements of compliance, benchmarking, enforcement and audit.

9. What is the role of the individual in relation to national crises? Are there potential benefits in increasing public involvement and transparency in emergency planning? What limitations are there to this? What lessons have been learnt or should have been learnt about the approach taken to risk assessment and risk planning in this country from the COVID-19 pandemic?

9.1 Much work and research has been undertaken across the UK in this regard. The work in Cumbria supported by Dr Hugh Deeming, Carolyn Otley, and the Manchester Briefings, led by Professor Duncan Shaw are exemplars of good practice. This includes education of our young people. There is an abundance of research, how do we share it and use it to add value and better outcomes?

9.2 Community resilience and sustainable communities is at the very heart of all that we do. In many areas, existing community groups have been utilised in support, in others, specific resilience groups have been formed. Good neighbourly support has been evident in abundance during Covid19. We are all citizens, with differing needs and abilities. We must consider this in the wider context of responding to and recovering from emergencies. In addition, we cannot ignore the prevalence of inequalities, which contributes to and increases vulnerabilities within our communities during emergency situations. Public involvement and empowerment are key at the local level. Resilience knowledge and practise must be built 'bottom-up' to achieve buy-in, trust and ownership. Less

bureaucracy and more action. Caring for people needs to be at the heart of a community that actively cares.

- 9.3** Involving the public is crucial. They should be consulted on risks in their area and those views should contribute towards Community Risk Registers and the NRR. Individuals should be empowered with easy to digest material to improve their personal/community feelings of perceived self-efficacy. Benefits include better risk perception, self-efficacy, hazard salience, community cohesion. Limitations may include: Individuals adopting fatalistic outlooks when faced with events that are difficult to mitigate. The actual understanding of hazards may be limited from a public perspective.
- 9.4** Communication is vital. The right context, messaging and information sharing will determine much of how a community responds.
- 9.5** We inform and educate people living in high risk locations; airports, and nuclear power plants of the risks and action that can be taken. Many local authorities have provided guidance in a clear practical way. Which has been well received and understood.

Community resilience has long been supported and promoted and there are good examples across the Country. What lessons have been identified and should have been learnt about the approach taken to risk assessment and risk planning in this country from the COVID-19 pandemic? We had plans, we trained, rehearsed, and conducted exercises where areas for improvement were identified. Many were never addressed because subsequent governments and devolved administrations did not see planning and preparing for such risks as a priority where there were more competing demands for funding and resourcing.

- 9.6** Covid lessons: risk assessment was done well. Planning included a massive exercise (Cygnus). Lessons from this were not fully considered and have never been published. In addition, much of the response at strategic level has been characterised by a lack of decision making until it's too late. It is also quite clear that: the health service has insufficient standing capacity for physical healthcare, mental health services continue to be under funded, regulation of care homes is insufficient, recruitment of medical staff is systemically insufficient and the approach to overseas workers is flawed through our immigration policy. No system can run at 100% all the time. 80% with an occasional surge is reasonable. Investment must be considered across all sectors.

10 What challenges are there in developing resilience capability? Your answer could refer to critical infrastructure, but also to systems and networks beyond those elements. What is the role of exercising to test risk preparedness, and are these methods utilised effectively in risk assessment and risk planning in this country?

- 10.1** Much of this has been covered in the previous questions.
- 10.2** Resourcing, there are not enough professionals to manage the workload and do it properly. The role of emergency management and resilience must change to be a recognised profession with career progression aligned to qualifications, knowledge, and experience.
- 10.3** Executive level support and buy in to what is required is critical. Too often competing priorities can reduce the input and participation in training and exercising. Perhaps the ongoing response to Covid19, will be a stark reminder of the need to train and exercise.
- 10.4** Perhaps it is also time for a review of emergency services across the UK. Is there added value in national organisations, in addition to a more joined up approach with health and local authorities. Currently there are too many tiers which dilutes resource and response.

11. What can be learnt from local or corporate risk management processes, or those of other countries? Are there any specific examples of practices, processes or considerations which could improve the UK's national risk resilience?

- 11.1** Risk management has been made to be too complex. To get buy in, engagement, we need to simplify what we do and how present it. We need to use expertise in risk associations to support our work, change the conversations and the culture.
- 11.2** Businesses should be involved in resilience planning; large businesses have access to contacts that the public sector do not. The challenge however can be through a conflict of interest and potential for bribery. Professional societies could support this, removing the barriers.
- 11.3** San Francisco 72 is a fantastic initiative.
- 11.4** Risk management processes should be shared where geography / characteristics are like those within UK. Such as in Holland where the risk of tidal flooding is like that of East Coast.
- 11.5** If you consider risk in the context of the pandemic, and any international airport, e.g. in Asia, there is a comprehensive process for the clinical assessment, identification, tracking, isolation, and processing of visitors and returning nationals. In Heathrow arrivals

have just been able to walk through and get a taxi or tube into London. The UK is not process driven and has failed to react rapidly and decisively.

Forthcoming Operational Resilience Regulations in the financial sector should help set the right context. However, this is not aligned or integrated with governments or civil society; there continues to be confusing and conflicting terms. Operational Resilience versus Organisational Resilience BS65000 versus Community Resilience versus Societal Security (ISO22301). The landscape will remain cluttered until we address this.

11.6 There are several models that can support innovation, empowerment and transparency; safety culture, just culture, continuous improvement culture, growth culture and infinite mindset are all useful. These are vital factors to successful effective risk management and strategic agility. Government talking to and listening to business and civil society would help support resilience preparation (e.g. consider recent EU exit challenges)

11.7 To effectively manage U.K. National Risk and Resilience, we must address the political spectrum and make it fully non-political. However, this could only be achieved by inviting all main parties into strategic discussions and requiring the heads of those parties to sign off as one, without the opportunity to blame others for political point scoring.

12. What individual or economic behaviours would strengthen national resilience against hazards, and what mechanisms are open to the Government or society to incentivise these behaviours? How should we prioritise any changes required in approach, process or policy needed to improve risk mitigation and strengthen the UK's resilience to extreme risks and emergencies?

12.1 The UK needs to do more to promote the emergency planning profession by supporting and recognising the critical role 'we' play in keeping our communities safe and ensuring we all remain resilient; being, 'prepared to respond to recover' from what is for most, the 'worst day of their lives' and limiting the consequences on people, the environment, economically and our infrastructure.

As emergency planners we specialise in all aspects of major incidents and emergencies and yet for most organisation we are the 'Cinderella' service, only rolled out when something happens. The Emergency Planning Society is making a difference with the development of professional standards for resilience along with many other strategies going forward however we need a seat at the table of strategic decision making for the UK, financial funding and a closer co-operation with government departments including Civil Contingencies Secretariat, Cabinet Office and the devolved administrations.

- 12.2** Funding If we're going to manage risk more efficiently and involve the wider public and business, we need to be funded to do it effectively.
- 12.3** The UK has actively taken steps to reduce its national resilience because of EU exit. Collaboration and co-operation on all levels and across international borders is essential.
- 12.4** Incentives for individuals and businesses to purchase affordable insurance, facilitating the opportunity for emergency savings.
- 12.5** There is a need to reflect on how national emergencies are handled. Public enquiries are perhaps not the most useful and beneficial mechanism of delivering tangible outcomes and actions. They are often used to appease the public, whilst costing huge sums of money, only for the same scenario to repeat itself. We should be asking why they have been so ineffectual and how can we work to use a better tool to reflect on disasters to deliver real improvements. Is it already there yet not fully utilised, ref 12.6.?
- 12.6** The introduction of Joint Organisational Learning (JOL) through the Joint Emergency Services Interoperability Principles (JESIP) has developed joint learning from incidents and emergencies, with the aim of identifying areas for improvement and implementing changes in policy and practice. There has been some success, yet there remains gaps and barriers to fully embedding the robust principles of the programme. More work is needed to have this fully embraced across all sectors.
- 12.7** There should be no further building on flood plains. All new buildings should expect to be flooded and have flood resilience measures built in. New buildings should also have solar panels on the roof top to generate electricity and a home battery. So, when the power does go off, there is some resilience. There should be increasing government incentives for developers to build in a sustainable and green way.
- 12.8** Economic behaviours - restoring manufacturing and processing capability within the U.K. Use nature-based solutions to increase food production. Reduce supply chains through regionalised production, manufacturing, and sales distribution. Opening more internal trade markets, especially for food would help to advance this.

Summary

This submission has been informed from the membership of the Emergency Planning Society, from a range of sectors within the emergency management and resilience community.

The Emergency Planning Society would be delighted to participate in the Select Committee, and to provide any further information, advice, and expertise to the Panel as is deemed appropriate.

Thank you for the opportunity to contribute.

Submitted by
The Board, Emergency Planning Society

February 2021