



The Emergency Planning
Society
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**Civil Contingencies Secretariat
Cabinet Office**

Re: Response to National Resilience Strategy – Call For Evidence from The Emergency Planning Society.

This response was submitted via the online system as requested, however we are taking the opportunity to also provide a consolidated response as some of the questions refer to each other or include references which may be easier to read in full.

This response is structured in the same way as the Call for Evidence. Responses have only been included for the questions the Emergency Planning Society provided a response to.

Vision and Principles

- To what extent do you agree with the proposed vision of the Resilience Strategy? Please explain your view.
 - The UK Emergency Planning Society is a professional body whose broad membership has significantly expanded over the last three years. We have a code of professional conduct (EPS 2020) and clear approach to continual professional development. Our Fellows and Professional Working Groups are invited to consult internationally on matters relating to resilience strategies.
 - We consider ourselves to be the voice of resilience practitioners across the UK, drawn from both the private and public sectors. We recognise the National Resilience Strategy as essential, now more than ever, to ensure that the intentions outlined in the Integrated Review can be co-developed with the involvement of experienced practitioners.
 - Questions posed by our members to the consultation include: What does “most resilient country” mean in practice? Who is it proposed that we are comparing ourselves against, and using what measures? What timescales will reviews of preparedness be conducted? And by whom? There are a range of global initiatives to determine resilience maturity, not all of which the UK has been keen to adopt (UN Resilient Cities, 100 Resilient Cities etc).
 - Members of the Emergency Planning Society have expressed their frustration during the COVID response that a political message of ‘being the best’ carries an implication that it comes at another nation’s detriment. The EPS recommends taking a collaborative rather than a competitive approach and that the UK should be seeking to listen and share best practices. This is embodied in the comments in the paper about ‘building a more resilient UK *together*’.
 - There is a general ‘top down’ tone to the vision, and we would recommend consideration of a more organic two-way approach to enable the delivery of national





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objectives whilst also recognising the need for local fit and co-creation of local initiatives with communities, based on evidence and reflecting on lessons. This would ensure better alignment with a comment in the Call for Evidence that 'the local tier must continue to be the fundamental building block for UK resilience', which has been eroded in COVID and Brexit response.

- Is there anything you would add/remove?
 - Members have expressed concerns that the risk assessment process is overly bureaucratic and does not give sufficient flexibility for local communities and areas to reflect the risks they consider most important.
 - The voluntary and community sector has played (both formally and informally) a vital role in the COVID response. It is concerning that their views do not appear to have been specifically sought out through this call for evidence. They are likely to have an increasingly important and complex role to play and we would recommend specific conversations with Voluntary Sector representatives.
 - Whilst needing to be handled sensitively we would support there being a more open public conversation about resilience. The Resilience Strategy and activities which flow from it should be grounded in what our communities need and want, as well as wider national objectives.
- To what extent do you agree with the principles laid out for the strategy? Please explain your view.
 - We would be interested to see and offer the expertise of our collective membership to co-develop frameworks and benchmarking tools so that these tools reflect both the reality that organisations find themselves in as well as being user friendly.
 - We draw attention to the work of the National Preparedness Commission (Denyr and Sutliff (2021) who state that 'the development of resilience is an adaptive rather than a technical process' and provide five rather broader parameters which form the conditions within which resilience is shaped. These may be more applicable than the three stated principles here.
 - The failure to learn from past incidents is well documented (Kernick (2021), Coles (2014), Pollock (2013)) however the section of the Strategy which covers prevention, mitigation and recovery, does not seem to make explicit reference to learning. We feel this is an oversight and that having a consistent, legislated, national approach would be a significant development in bringing about the culture change required to make learning lessons more commonplace.

Risk and Resilience

- Is there more that the Government can do to assess risk at the national and local levels? If so, what?





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- Our members reviewed the section regarding the use of data in risk assessment process with great interest. Our members would encourage the Government to consider what data it is appropriate to make available to local responders (with the proposed starting point being a 'share by default' position) and also to consider what data or evidence may be available outside of the Government/Category1/2 responders and may be possessed by ALBs, Charities, Academia and the Private Sector.
- There needs to be a better balance struck between top-down vs bottom-up approach (Leigh 2012). There needs to be greater coherence between local and national risk assessment processes.
- More data and an improved process will help, but this cannot be overly prescriptive. Pre-COVID risk assumptions (Cabinet Office 2013) considered an influenza pandemic and the 'reasonable worst case' for deaths remains unsurpassed by COVID. However, that risk did not fully consider the wider social and economic impacts of disrupted international and local travel, national school closures or some of the other non-pharmaceutical interventions that have been implemented. The assessment of risk and development of policy needs to allow for uncertainty.
- The inconsistency and inequity experienced and reported (Patel (2021), PHE (2020)) in connection with the Shielding scheme is an indication that risk is more complex than just the impact and likelihood. We suggest that consideration is given to understanding vulnerability to different risks also (to include consideration of existing and precipitating vulnerabilities).
- The role of behavioural insight in UK risk assessment process and subsequent policy development needs further examination. Members of the society request a formal analysis of this work.
- Is there more that the Government can do to communicate about risk and risk appetite with organisations and individuals?
 - Appetites towards risk vary and therefore we would recommend that the approach taken by the Government is informed by available evidence on risk appetite and risk perception. This should be drawn from risk science and disaster management evidence bases, as well as the current preference for psychology.
 - Our Fellows have contributed fully to international guidance on this area (Casajus et al, 2021) which we would suggest that that strategy reviews in full.
 - The experience of our members in other emergencies forecasts that there will be a high level of public concern and anxiety. However, we would recommend an empathetic nationally-led open conversation with the public to better understand local risk appetites and tolerances so that risk communication activities at the local level have greater resonance.
 - We have been extremely concerned, and disappointed, that on many occasions the message coming from Government was that a pandemic was unprecedented and





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there had been no planning, which is incorrect (Cabinet Office 2007, DH 2011). This discredits our members and the wider emergency planning profession. We feel that this reflects a lack of risk understanding within Government.

- We do, however, commend the Cabinet Office for steps taken to make risk assessment information more accessible. Whilst there is still some way to go to reach optimal access to information, there have been considerable step changes that have assisted with understanding and local risk assessment processes.
 - We urge the Government to fully consider the recommendations of the forthcoming review of the risk assessment process by the Royal Academy of Engineering (due 2021). This methodological review should also be read in conjunction with the Blackett Review of High Impact Low Probability Risks (GO Science 2011) and Risk Management in the UK (Hilton and Baylon 2020).
 - We are aware that our colleagues in Sweden recently circulated a leaflet (MSB 2018) to every home setting out emergency response considerations and arrangements. There has been no coordinated UK effort since the Preparing for Emergencies leaflet.
- How could the Government make risk assessment and data more accessible by frontline personnel in an emergency?
 - It was not clear to our members what the process for, or utility of sharing risk data with frontline personnel would be. By the time frontline staff are responding it is likely too late and more dynamic risk assessment processes would be taking place in line with JESIP rather than more considered risk analysis.
 - We considered how Government could make data more accessible and agreed that there was space for further development of Resilience Direct to allow for a risk assessment 'module' to enable a nationally consistent platform for sharing risk assessment information
 - We must highlight to the Government that the way in which risk information was shared with the public, responders, frontline staff and emergency planners during COVID was far from optimal. Multiple, late-night, uncoordinated policy announcements caused a significant burden for local responders which was entirely avoidable by having better information sharing ahead of announcements.
 - How does your organisation assess risks around unlikely or extreme events, when there is limited or no data?
 - The EPS recognises the need for risk assessment for the process of determining priorities. To date, the risk assessment process has been largely qualitative and this has allowed for risks with high levels of uncertainty to be captured. With a desire to bring more data analysis into the risk assessment process, we recommend that there is still opportunities to consider low likelihood high impact events.





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- The Global Risk Report uses a quasi Delphi technique to ask a diverse range of scientists questions about risk. A similar approach could be implemented for the National Risk Register to engage with academics, practitioners and sector leaders. This would also assist in ensuring that risk assessments are informed by organisational memory.
- How could the current local risk assessment process, managed through Local Resilience Forums, be strengthened to help local partners?
 - There needs to be a better balance struck so that local risk assessments can meet national objectives whilst also allowing for local co-creation and development, including wider participation from non CAT1/2 organisations such as business and community sectors.
 - The Royal Academy of Engineering review into the National Security Risk Assessment is welcomed and we would encourage the Government to share the report with those working in the profession. There are some of our members who feel that the continual methodological changes are not well communicated or made explicit.
 - We note the recommendations from the RAEng regarding consideration of alternatives to the Reasonable Worst Case Scenario (also identified by Fischbacher-Smith 2010). This has been previously identified in the Blackett Review (GO Science 2011).
 - Whilst emergencies can occur anywhere, we would also recommend that the Government might consider allocating funding on a partially risk-based approach.
 - The pilot funding made available to Local Resilience Forums has been a positive step, however came with minimal notice and has not been consistently applied. It would be helpful if there are to be further funding allocations for there to be a different process to the allocation.

Responsibilities and Accountabilities

- Do you think that the current division of resilience responsibilities between Central Government, the Devolved Administrations, local government and local responders is correct?
 - There is a disconnect between the CCA and the regulations and the non-statutory guidance.
 - There are competing principles in the (out of date) CONOPS (Cabinet Office 2013b) between subsidiarity and direction, and it's unclear how the conflict between those two principles is managed.





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- The idea of subsidiarity also needs further consideration in the scenarios of national emergency, such as COVID, there have been multiple approaches, often simultaneously.
- Members feel that there is a level of inconsistency between what is dealt with locally and where direction comes from central government. This changes depending on the political administration and other factors.
- The Lead Government Department model is useful, coordinated response at the local level would often benefit from a more clearly defined point of national control. One example of this is the plethora of guidance and policy that was introduced during COVID by different departments but requiring implementation by local organisations.
- Broadly members felt that with some administrative updates the arrangements in the CCA remain valid but that there is a pressing requirement to ensure the regulations and supporting guidance are more frequently updated to keep pace with both changing organisational structures and the reality of contemporary emergency management.
- We were concerned that the CCS was seemingly invisible during COVID (Alexander (2020), Jordan et al (2020)). Whilst we are reassured through the call for evidence and the National SitCen development, we anticipate a shifting of focus in CCS which could have implications for the local tier.
- Members also expressed concerns that previously planned structures and arrangements were not utilised during the COVID response. Whilst we accept and encourage all planning to have a degree of flexibility and agility, foundational elements (communications and coordination) were lacking from a national level during COVID.
- Members noted that the CONOPS talks about 'levels of emergencies' but this does not appear to be reflected in other guidance. There is potential for 'levels' to be useful, but that needs to continue through other doctrine and guidance.
- There are examples internationally (NEMA 2016) where a Minister for Resilience provides a rope to be thrown around multiple gov depts at the top level and allows for both better coordination but also a public demonstration that resilience is a priority.
- Members would be interested in the progress made to meet Theresa May's PM announcement (Hansard 2017) regarding the creation of a Civil Disaster Response Taskforce.
- There is a slightly more nationally coordinated model in Scotland where a regional coordinator is the key point of contact.
- Members were unclear of the remit and mandate of the 15 resilience hubs introduced this year throughout England.





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- Following the 2010 devolution adjustments, we would reflect that the removal of Regional Resilience Teams has left a considerable gap in terms of support for local areas.
- There have also been concerns raised about the Gov's first reaction to be to call on Military assistance rather than local capacity. We have incredible respect for our defence colleagues but would recommend that local capacity is developed as a more sustainable approach, leaving the support from the Military to be by exception only.
- How can the UK Central Government, Devolved Administrations, local and regional forms of government and local responders better collaborate on resilience?
 - We would encourage early collaboration and trusted relationships with professional bodies to assist in the development and socialisation of guidance before it is issued.
 - The introduction of the UK Resilience Forum is welcomed and overdue (Defra 2008). We feel that this could serve to be a useful model for engagement, however, we would reiterate that there should not be a hierarchical relationship between this and Local Resilience arrangements. The UK Resilience Forum should not be seen as a vehicle for the Government or Industry to take decisions on local planning or response. We also feel strongly that there should be representation at this forum from practitioners, and that this could be via a deepening of the relationships with the EPS. We strongly feel that the governance arrangements for the UK Resilience Forum should mirror those of other public sector organisations with regards to known membership, published agendas and minutes and where appropriate broadcast meetings with opportunity for public comment.
 - We also recognise that our collective language and norms evolve, and therefore would recommend that as part of the review, supporting central guidance such as the Civil Protection Lexicon are updated to boost the consistency of language and understanding.
 - We welcome all attempts to increase resilience. We recognise that the Emergency Planning College has a commercial structure and welcome that this brings additional investment and perspectives, however we feel that this should bring a return of that investment into subsidising civil practitioners attendance at courses. We note with interest the references in the Integrated Review the suggestion of a College of National Security. Proper investment is overdue from the Government in developing the Emergency Planning College to be a source of professional accreditation as well as being a recognised authority in the field of resilience. We were shocked about closure of EPC and furlough of staff when their advice and training was most needed.





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- What role, if any, should the UK Central Government have in assuring that local areas are effectively carrying out their resilience responsibilities, whilst also respecting local responsibilities?
 - We feel that there has been a devaluing of the role of audit as a tool for change and improvement.
 - There has been good work to develop resilience standards, but there now needs to be a body charged with determining to what degree those standards have been met. There are a number of organisation/sector-specific audit processes, which have been identified by our members as good practice, however, we recognise that there is a gap when it comes to collective assurance. Whilst not without its issues, the decline of the National Capabilities Survey is noted as a particular example where joint assurances were provided.
 - The EPS urges the Government to exercise caution with regards to standards however, that in the face of likely budget pressures standards are not seen as a 'race to the bottom' by organisations nor are there attempts to produce league tables relating to resilience.

- The primary legislative basis for emergency management is the Civil Contingencies Act 2004 (CCA). Specific questions on the CCA are covered in Annex A. The UK's resilience also depends on legislation covering specific risk areas including, for example, the Terrorism Act 2000 and the Climate Change Act 2008, amongst others. What do you consider the advantages and disadvantages of the current legislative basis for resilience?
 - We have seen countless examples over the response to COVID where plans that had been made were not utilised and legislation that was available for the introduction of emergency powers was not used.
 - Our members have consistently highlighted the uphill struggle in bringing unplanned responses back to more planned and tested arrangements.
 - We recognise the need for a degree of flexibility in planning for emergencies. However, our members would urge the Government to work with the profession to adapt of existing capacities, rather than improvising a response. This is a more legally defensible for professionals and by extension, their organisations.
 - We would suggest that, in addition to having the legislation and supporting guidance, the Government recognise and endorses the Emergency Planning Society's 'Approved Code of Professional Conduct (EPS 2020) applicable to anyone working in this field.

Partnerships

- Do you think that the resilience of CNI can be further improved? If so, how?
 - Yes, we feel that there are always improvements that can be made and insights that can be used to refine planning.





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- However, we discussed the routes to doing this and agreed that it could be challenging given the scale and scope of the CNI sectors.
- Members felt that resilience arrangements relating to CNI too often focused on acute shocks which discounts the more chronic routinely issues related to the age and capacity of their systems and the compounding effects of resource pressures.
- There was also a recognition that whilst some CNI players have involvement in local level planning, others (particularly food and logistics industries) Are less well connected at the local level. We
- We are pleased to see the consideration of systemic approaches to infrastructure resilience and would highlight that there is some good practice in this area in considering interdependencies, such as the Anytown model from London LRF.
- Do you think the introduction of appropriate statutory resilience standards would improve the security and resilience of CNI operators? Why? How would such standards define the necessary levels of service provision? Are there any risks associated with implementing such standards?
 - Members of the Emergency Planning Society felt that a co-developed code of practice might be more appropriate than standards, which could be interpreted as a race to the bottom.
 - We would also encourage all CNI sectors to have a seat at local resilience planning forums, at the regional level is more feasible, to build relationships and share assumptions.
 - It was interesting that the section of the call for evidence about partnerships contains lots of questions about standards.
- What do you think is the most effective way to test and assure the resilience of CNI?
 - Our members discussed the potential for a benchmark to be developed so that CNI resilience can be stress-tested, with similar requirements to COMAH and Reservoir testing regimes.
 - We would encourage that where there are local level benchmarking activities, that these feed into wider consequence management with local partners. For instance, whilst there is considerable utility in an airport testing its own internal procedures, the value of such an exercise is increased if that exercise includes consideration of wider aspects such as local humanitarian assistance and consideration of immigration/asylum issues.
- To what extent do you think regulators should play a role in testing the resilience of CNI systems and operators?
 - We agree that working with regulators can be beneficial in both 'carrot and stick' initiatives to promote action.





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- During an emergency, what do you think should be the role of the operators of CNI in ensuring continued provision of essential services (e.g. water, electricity, public transport)?
 - They should carry on doing what they already do, having teams that respond to support welfare, enable response etc
 - There should be consideration given to increasing the responder status of some CNI operators, such as some transport providers and operators who already have well established operational 'response' roles and are critical to effective integrated emergency management.
 - We would ask the Government to explore options to work with CNI organisations and their respective regulators to ensure that resilience is considered across their organisational strategy.

- What are the risks that your business or organisation is most concerned about?
 - EPS members feel that it is hard to separate out global level risks as they are interconnected in many ways (WEF 2021), often with unknown or unknowable feedback loops. However, key risks and global context issues that we consider to have a bearing on resilience globally include:
 - Climate Change
 - Water Scarcity and Food Security
 - Energy security
 - Terrorism and radicalisation
 - Global Logistics

- What information, tools or guidance could the Government provide to help your business better assess or prepare for these types of risk?
 - Greater focus on educating our communities about consequences and risk management, which at present appears to be a tick box exercise.
 - Working with communities to understand their existing conceptions and the language that they use when considering risk. This would enable government and responder organisations to have a more honest and open conversation about risk management.
 - A specific duty of Local Authorities is the promotion of Business Continuity, however, this is an area where there has been an inconsistent approach and requires further guidance and resource to be meaningful.

How useful have vehicles such as Local Enterprise Partnerships, Growth Hubs and other local business support services been strengthening your organisations' resilience? Why?

- It may be more effective use of resources to use these channels for the promotion of Business Continuity and to seek local input on tailoring policies to support business communities and local economies.





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- There is a good example in the role of London First which has provided much-needed thought leadership and insightful presentations to a wider set of businesses than would ordinarily have been considered.
 - We would also highlight the Business In The Community initiative, which although it has had mixed successes, offers a good model for a coordinated approach to working alongside businesses, not simply doing to them.
 - There are also examples of business sector organisations providing support into their local economies (CLEP 2019) in the recovery phase, and the Government should try to capitalise on this to have a clearer understanding of the contributions that can be made.
- What can the Government do to make collaboration between academic and research organisations more effective?
 - We commend the Government for recognising the role that research has to play in developing resilience policy and capability. We would recommend that the Government develop this as a tripartite relationship between policymakers, academics and practitioners to bring about the greatest benefit.
 - There needs to be greater recognition that quality academic research can take time and money. The research, therefore, needs to be commissioned with sufficient foresight and resource.
 - EPS Members would suggest what would really help in bridging the policymaker/academic/practitioner gap is a national research strategy and standards (FEMA 2015), perhaps co-developed between professional societies, the Emergency Planning College and key Research Councils.
 - There needs to be consideration of centrally provided funding to have certified degree programmes and continued professional development, this could take a similar form to the NCSC-certified degrees (NCSC 2017) in our sister field of cyber security.
 - Are there areas where the role of research in building national resilience can be expanded?
 - Whilst there is a great deal that we can learn from international considerations, there are few UK Universities that have research targeted at Emergency Management in the UK.

Community

- Do you agree that everyone has a part to play in improving the UK's resilience? If not, why not?
 - As the professional body for emergency planners in the UK, we wholeheartedly agree that everyone has a part to play. Emergency management and Resilience is a field as wide as society itself. It, therefore, requires a whole society approach. We





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- agree with taking an all-hazards approach but would caution that this needs to be defined and communicated more clearly and that it shouldn't be at the detriment of specific planning where necessary.
- The field has consistently struggled with the recovery process from major incidents and this is an area where we would ask to see comparable input and investment to other nations such as New Zealand (Easthope, 2018). This is where community engagement and understanding, and support for smaller business, becomes paramount.
 - Our members have a full and in-depth knowledge of the range of risks and threats facing the country and their communities. Many planners are of their local community and fully understand the challenges they face.
 - What would help you better understand the risks that could affect your community?
 - Our members would recommend making the information in the National Risk Register (and the Community Risk Registers that it informs) more coherent and easier to access.
 - All local resilience areas publish a CCR but they vary in quality, standard and content (Leigh 2012).
 - Have you considered the actions you might take to prepare for or during an emergency?
 - We consider them every day.
 - One operational question - How many people have actually prepared a grab bag? Our members suggest that uptake of grab bag messaging is likely to be extremely low. Despite best intentions, there has been minimal national interest in locally-driven campaigns to boost preparedness. There is a perception that Government either doesn't want or is prevented from engaging in initiatives such as 30 Days 30 Ways UK (2021).
 - Proactive community engagement requires a very different approach and resourcing to reactive crisis communications. Our systems appear to be geared more towards getting messages out once things have gone wrong, than towards helping people prepare themselves and mitigate future consequences.
 - Have recent emergencies (e.g. COVID-19 pandemic, flooding, terrorist attacks) made you think differently about risks or changed the way you prepare for emergencies?
 - The experience of COVID and Brexit has generated considerable reflection within our membership. We believe that these events will be fundamental in how we think about emergency management in the future and that they will in time bring change. However, much of that change will be determined by people working locally to resolve issues rather than through systemic policy-driven changes.





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- We can likely learn a lot about public behaviour from COVID however this will take time to be properly analysed and interpreted, and we cannot be sure at this stage how long-lasting the changes will be. The emerging narrative of 'return to normal' also implies a return to pre-COVID conditions and therefore dismissal of learning.
- Are there any barriers in accessing local volunteering schemes or finding community groups that discuss local emergency planning? If so, what are the barriers?
 - The largest constraint mentioned by EPS members was relating to having sufficient resources available to engage meaningfully with the voluntary and community sector. Efforts are focused around the larger constituted voluntary organisations because this is logistically easy. However, there is a big gap in terms of engagement and mutual support to the wider voluntary sector. There are incredible voluntary groups across the country, all of whom have stepped up to continue providing much-needed services for their users during the pandemic (British Future 2021). However, without resources to engage properly, relationships are likely to resort to previous arrangements (Dunmore 2021).
 - This is an area that the UK Resilience Forum should explore in further detail.
 - Rather than mandating the voluntary sector to deal with LRFs, we could mandate the LRFs to work with volunteer organisations in a better manner

Investment

- How does your organisation invest in your approach to the risks outlined in this document? Is your investment focussed on particular stages of the risk lifecycle (for example, on prevention)?
 - There are wide variations in the investment objectives of Category 1 and 2 organisations. In Local Government, investment is usually limited to staff resources, whereas in other organisations it can include large scale prevention or response capabilities. It would be helpful for there to be, at a national level, a targeted and evidence-based approach towards investment.
 - We are concerned about the number of organisations that are subcontracting their emergency planning functions. Whilst there are some very capable consultants, including in the EPS membership, we also note that the post-COVID landscape could be a potential market for less well qualified and experienced consultants.
 - We are also concerned that for necessary reasons, training of emergency planning professionals will have declined over the last year, and would encourage Government, Professional Societies and Industry to work together to ensure training needs are understood. The Emergency Planning Society Core Competencies would be helpful in assisting with this.
 - We have noted, with interest and concern, the discussion from the Manchester Arena Inquiry (2021) regarding the limited ability and capacity of local responders to





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act on learning from exercises before planning the next one. There needs to be a review of the guidance relating to training and exercising to ensure it is fit for purpose.

- Has the COVID-19 pandemic impacted the way your organisation is investing, or will invest, in preparing for these risks?
 - As we would have anticipated, prolonged incident response is challenging in a variety of ways. However, one of the most acute challenges is the impact of staff capacity and resources.
 - Overall, we expect to see a greater emphasis on risk management as a whole. Some of this will translate to emergency planning investment, however much of it will be an investment in the recovery of those areas of business that have endured the greatest impacts.
 - The LRF Pilot funding appeared to be random, unmanaged and unclear.
 - We sincerely hope that the government has recognised the benefit and contribution of emergency management and public health at the local level. There are highly experienced and capable professionals who have suffered a degradation of the level of resourcing for some time, and now is the time to ensure the appropriate funding is available.

- Are there models of successful resilience investment? If so, to what extent could they be adopted in the UK?
 - The Office of Emergency Preparedness in Ireland provides a national centre (joint service between Defence/Home Affairs/Health) with local branches. This allows for coordinated response (80% of funding comes is central and 20% from local (DoD 2021)) whilst also allowing flexibility for local adaptation within a wider strategy.
 - Insurance also represents a form of investment and schemes such as Pool Re / Flood Re should be reviewed in light of COVID to ensure the maximum protection for organisations and policy holders.
 - We would be interested to understand how Brexit has affected the UK's access to EU funding (Horizon 2020 etc) for resilience projects, and what plans the Government has to balance that lost funding. More emphasis could be made on the pools of specific project funding available for LRFs or their constituent organisations to access on an application basis. This has some parallels to the FEMA/DHS funding model in the United States, where a range of grant programmes provide funding for projects.

- Are there examples of where investment (whether by the Government, by businesses or by individuals) has driven improvements in resilience?





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- Government initiatives in economic recovery such as local grant schemes following weather incidents and the Novichok poisonings in Wiltshire have proved positive.
- Following Storm Eva, there was a fund for flood resilience and a huge uptake of resilience grants for small businesses. Communities given grants sometimes pooled their grants to be able to undertake larger projects.
- We would request that the Government review the Bellwin scheme noting its significant limitations.
- Citizen Aid app – started as a small charity with a specific focus, but has broadened.
- Good Sam app – moving also into wider support to incidents from its initial focus.
- A sense that particular during COVID Voluntary Organisations have stepped in and filled statutory response gaps.
- Measures such as the introduction of Organisational Resilience Standards (ISO 2017) and Operational Resilience policy statements may have the effect of approaching resilience from a compliance angle and may be particularly assistive for the private sector to gain internal traction.

Resilience in an interconnected world

- Where do you see the UK's resilience strengths?
 - Emergency planning and resilience is (or should be) as diverse as society itself. The UK model of distributed planning across Lead government Departments does assist in ensuring that a wide range of organisations and bodies feel connected to resilience.
 - There are incredibly high levels of individual engagement and commitment (and determination) across the profession, including through the membership of the Emergency Planning Society.
 - Society members feel that there are good investment decisions made regarding flood defences, and the Local Resilience Forum/Partnership structure also offers a good framework for local planning (despite being under-resourced).
 - There are also other specific capabilities where the UK has strengths such as DVI, USAR and CT Response.
- Are there any approaches taken by other countries to resilience that you think the UK could learn from?
 - USA – FEMA representative at Cabinet
 - Ireland - central and local funding model
 - New Zealand – especially in relation to the integration of research and practice
 - Australia – psychological impact of wildfire
 - Germany – approach to volunteering
- Which of the UK's international relationships and programmes do you think are most important to the UK's resilience?





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- EPS members feel that it is challenging and problematic to single out individual relationships; they are all important and all have a vital role. We would urge full consideration of the range of consequences of adjusting relationships to avoid some of the issues that Brexit has and will continue to reveal.
- We would also like to note the important contribution of softer diplomacy and international relations which are as important as the formal structures and programmes.
- What international risks have the greatest impact on UK resilience?
 - EPS members feel that it is hard to separate out global level risks as they are interconnected in many ways (WEF 2021), often with unknown or unknowable feedback loops. However, key risks and global context issues that we consider to have a bearing on resilience globally include:
 - Climate Change
 - Water Scarcity and Food Security
 - Energy security
 - Terrorism and radicalisation
 - Global Logistics
- How can the UK encourage international partners to build resilience to global risks?
 - Our members felt that this question revealed an unsubstantiated air of superiority. The UK should focus on working collaboratively as equals, being open to listening and learning, rather than telling other nations what to do. There is space for the UK to take a supportive role but the UK could also learn much from others.
 - We are concerned that recent actions of the Government to adjust international aid allocations will have a detrimental effect on both international relationships and as a result on the resilience both of the UK as well as the recipient country.

Civil Contingencies Act

- Does the definition below reflect your understanding of an emergency, and if not how does the definition need to be expanded within the CCA?
 - No particular concerns about the definition, although EPS members feel that 'threatens' does not fully translate through into the rest of the regulations and guidance in terms of preventative activity, with the focus being on response.
 - We recommend that it would be helpful for there to be consistent interpretation at the highest level in Government to ensure the CCA definition and arrangements are understood.
- Is the current designation of Category 1 and 2 responders appropriate? If not, what would be the merits of changing the identities and/or status of responders within the CCA?





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- We would strongly encourage key national transport providers and operators to be included as Cat 1
- We would recommend that all CNI operators, strategic Financial industry partners and the Met Office are designated Cat 2.
- The role of the VCS and Military has evolved since the Act was drafted and although it may still not be appropriate to assign a responder category we recommend that the sections on these sectors are reviewed to ensure currency.
- There should be a full ranging review of Health and Social Care Emergency Planning and Response structures in light of COVID.
- Are there gaps in critical representation of responder organisations?
 - Our members highlighted that rather than gaps in representation this often was the product of a lack of coterminous boundaries between some sectors and LRF footprints, which could make sequencing suitable representation difficult.
 - Therefore we would recommend consideration of reintroduction of Regional Resilience tier to provide a more sensible engagement area for those organisations with large geographical footprints.
- Should elected local figures (e.g. Council Leaders, MPs, Metro Mayors, Police and Crime Commissioners) have greater involvement in emergency planning and preparative exercising, response and recovery and in what way?
 - Our members feel that due to the wide variation in Metro Mayor roles and powers it could be challenging to legislate in the area. However, it is an area where further guidance is required, recognising that elected figures have a very important role to play in all phases of the cycle.
 - We would encourage the Government to carefully consider the implications of a politicised local response, but recognise that elected officials in response can be helpful for providing public communications.
- Are the current duties on Category 1 and 2 responders, as described in the CCA, appropriate? If not, please list the duties which should be added, adjusted or removed.
 - Yes, we generally accept the duties as they are listed.
 - However, members noted that the Business Continuity promotion duty for local government has been inconsistently implemented and would benefit from further clarity.
 - Our members have also suggested that it may be beneficial for Cat 2 responders to be given some specific responsibilities relating to risk assessment.
 - It may be helpful to include, within the Act or the Regulations, an expectation that those working in resilience adhere to professional standards and code of conduct.





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- There are currently no provisions for collective oversight and assurance of resilience organisations within the CCA as they are reviewed by independent or organisational audit regimes. Are existing mechanisms for oversight and assurance of organisations involved in resilience adequate?
 - There is a patchwork of organisational audit regimes but no collective approach. There are some areas of good practice (NHS EPRR, Office of Nuclear Regulation) which could be further explored.
 - It is incredibly hard to map expected responsibilities to legal or inquiry standards and we would expect this to be a major finding of both Manchester and Grenfell public inquiries
- Should the CCA mandate review of local contingency plans covering a range of risk scenarios?
 - Our members feel any reviews at this national level should focus on structures, processes and competencies rather than the content of plans.
 - We would strongly encourage the Government to see this as a whole system review - rather than just focusing on the local level. Local plans are developed in keeping with national guidance so that national guidance and any national response plans also need to fall within the remit of any such review.
- If you answered yes to the question above, please rank the options below based on which you think would be most appropriate. For other options, please add to the text box below.
 - The EPS feels that peer review of emergency plans is unsustainable due to known resource pressures. We would also be concerned about the potential for liability issues on peer reviewers.
 - Generally, we would recommend that a mix and match approach would yield the best results and assessment of resilience capabilities at the local level.
- Do the arrangements as set out in the CCA provide the LRF Chair and Secretariat with sufficient means by which they can effectively coordinate contingency planning of Category 1 and 2 responders in their area?
 - The processes and structures are included. However, there is wide variation in the application and local delivery, where we feel that more standardisation proper funding, and dedicated competent LRF coordinators would assist. Our view is that LRF Coordinators would be uniquely placed to embody and implement professional standards and core competencies (Pollock and Coles 2019).
 - There should be a national forum for LRF Coordinators to work collaboratively, in support of multi-LRF activities such as widespread flooding.
- Enforcement remains an option under the CCA but would only be used as a last resort. We expect all public bodies and local responders to meet the highest standards in performing





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their duty and these standards are routinely upheld by their own organisational rules and processes. A Minister of the Crown may use High Court or Court of Session proceedings to enforce duties under Part 1 of the CCA upon a Category 1 or 2 responder. Is this the right way to enforce obligations under the CCA if duties are not met?

- Felt we were unable to answer this as not aware arrangements had been implemented and therefore impossible to review the effectiveness
- Does the CCA sufficiently consider recovery arrangements? If not, how could this be improved?
 - No, the Act doesn't even include the word recovery, so recovery arrangements are certainly not sufficiently covered.
 - We would also commend the work of Dr Hugh Deeming on the conception of a stabilisation phase occurring between response and recovery (Deeming (2017), Deeming (2020)) .
- Are the responsibilities related to information sharing and cooperation sufficient for ensuring an effective multi-agency response?
 - Recognition that CCA predates GDPR and there may need to be a more first principles level review of the information sharing clauses to ensure compatibility.
- How could we improve the effectiveness of LRFs (non-legislatively)?
 - We would recommend that the Government, through this call for evidence and ongoing engagement, take the advice of professionals working in the field with regards to how to enhance local planning effectiveness.
- Are LRFs/Strategic Coordinating Groups (SCGs) fulfilling a sufficient role in terms of planning, response and recovery? If not, what are the barriers to this?
 - We have been alarmed about the increasingly blurred lines between planning and response (i.e. LRF/P and SCG) that we have observed during COVID. This demonstrated a lack of understanding at the highest level about existing arrangements and limitations.
 - We would anticipate that the review provides greater clarity and specifically that if LRFs are expected to take on formal response roles that they are designated as legal entities so there can be appropriate governance and accountability for decisions made and action taken.
- Should specific duties be placed upon central government in Part 1 of the CCA, and if so, what would these be?
 - Yes, broadly we would see this as being largely similar to Cat 2 organisations but with some specific additions with regards to setting national policy and providing risk assessment information and data.





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- Would you like to note anything in regards to Part 1 of the CCA that is not captured by the questions above?
- Scotland, Wales and Northern Ireland: The CCA applies to the whole of the UK, but with some variations for Scotland, Wales and Northern Ireland. Part 1 is applicable to the equivalent organisations in Scotland and Wales, but applies only to a limited number of organisations in Northern Ireland. The CCA extends to Scotland, Wales and Northern Ireland in accordance with their devolution settlements and civil contingency arrangements. Are the responsibilities and duties set out in the CCA fit for purpose for Northern Ireland?
- Are the responsibilities and duties set out in the CCA fit for purpose for Scotland?
- Are the responsibilities and duties set out in the CCA fit for purpose for Wales?
- The CCA sets out strict conditions which must be met for emergency regulation to be made - this is known as the 'triple lock'. Are these conditions still appropriate and, if not, how could the 'triple lock' be improved?
 - Unable to comment fully as this has not yet been fully invoked but is concerning to members that so little use of the Act has been made during a series of concurrent crises in 2020-2021.
- Should the regional coordinator role be retained? If yes, why is this the case, and who should be eligible to fill the position?
 - Unable to comment specifically but a strong recommendation that anyone in this position should be suitably experienced, trained and qualified.
 - We recommend a return to the fully supported Regional Coordinator which was supported by the ODPM
- Would you like to note anything in regards to Part 2 of the CCA that is not captured by the questions above?
- The following questions are on the Statutory Guidance which accompanies the Civil Contingencies Act 2004 ('CCA'). Are there institutions and positions that have come into existence after this CCA was developed which should be included in the statutory guidance? For example, Police and Crime Commissioners and Combined Authority Mayors ('Metro Mayors').
 - We would support the Act being written in such a way that it avoided the need for a frequent update to respond to changing organisational structures.
- Would you like to note anything in regards to the statutory guidance of the CCA?
 - We fully welcome the open approach the Cabinet Office has employed in this call for evidence and trust that all of the comments will be duly considered.
 - In particular, we are encouraged that this has been done in an open consultation format and has provided opportunities for individual members of the community and practitioners to respond in their own right beyond the views of their employer.





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- We would like to see, as part of this call for evidence, a consolidated summary of the range of comments and evidence received.
- Our members would be more than happy to assist in further development and co-creation of resilience policy and would encourage a more agile approach to the review of guidance being taken so that it can be updated as required.

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