

Decision title

Internal Audit - Draft Annual Plan for 2020/21

Recommendation by Decision Number

Assistant Director, Finance LFC-0328-D

Protective marking: NOT PROTECTIVELY MARKED

Publication status: Published in full

Summary

The London Fire Commissioner's Financial Regulation at paragraph 13(m) (Internal Audit) requires the draft annual audit plan to be approved by the Commissioner. Report LFC-0328 contains the draft Internal Audit annual plan for 2020/21 and is submitted in compliance the aforementioned internal regulation.

This plan is produced by the Internal Audit Service which is being delivered by the Mayor's Office for Policing and Crime (MOPAC) under the shared service arrangements that were formalised in November 2012. The report proposes a risk-based approach, in line with the Public Sector Internal Audit Standards (PSIAS), using Internal Audit's and management's assessment of risk, focused on reviewing areas that are key to achieving LFB objectives and priorities. The content of the plan is designed to meet the statutory requirement for an annual opinion on the adequacy and effectiveness of the risk and internal control environment. The plan recognises this is a time of significant change for the Brigade with an ongoing demand to improve efficiency and achieve better value for money whilst responding to the challenges of transforming the way the LFB serves and protects Londoners. Internal Audit will therefore report on opportunities for improving efficiency and value for money in all aspects of its work and will look to provide assurance and advice on the developing transformation agenda in additional to business as usual activity.

Decision

The London Fire Commissioner approve the approves the proposed Internal Audit Annual Plan for 2020/21 as set out in Appendix A of report LFC-0328.

Andy Roe

London Fire Commissioner

This decision was remotely
Date signed on Friday 3 April 2020

Access to Information - Contact Officer

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Report title

Internal Audit – Draft Annual Plan for 2020/21

Report to	Date	
Operational Delivery and Assurance DB	12/03/2020	
Corporate Services DB	17/03/2020	
Commissioner's Board	25/03/2020	
Report by	Report number	
Head of Audit and Assurance	LFC-0328	
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This plan is produced by the Internal Audit Service which is being delivered by the Mayor's Office for Policing and Crime (MOPAC) under the shared service arrangements that were formalised in November 2012. The report proposes a risk-based approach, in line with the Public Sector Internal Audit Standards (PSIAS), using Internal Audit's and management's assessment of risk, focused on reviewing areas that are key to achieving LFB objectives and priorities. The content of the plan is designed to meet the statutory requirement for an annual opinion on the adequacy and effectiveness of the risk and internal control environment. The plan recognises this is a time of significant change for the Brigade with an ongoing demand to improve efficiency and achieve better value for money whilst responding to the challenges of transforming the way the LFB serves and protects Londoners. Internal Audit will therefore report on opportunities for improving efficiency and value for money in all aspects of its work and will look to provide assurance and advice on the developing transformation agenda in additional to business as usual activity.

Recommended decision(s)

That the London Fire Commissioner:

1. Approves the proposed Internal Audit Annual Plan for 2020/21 as set out in Appendix A.

Introduction

1. The statutory finance officer is required to submit a report (a) before the commencement of each financial year detailing planned Internal Audit activities for the year ahead and (b) within six months of the close of the previous year reviewing that year's activities. This report is submitted in accordance with the first part of this requirement in that it provides the LFC with planned Internal Audit activities for 2020/21.

- 2. The Financial Regulations, at paragraph 13(m), states the draft audit plan must be approved by the Commissioner following discussion and agreement at the Operational Delivery & Assurance and Corporate Services Directorate Boards.
- 3. MOPAC is responsible for the provision of Internal Audit Services to LFB as part of a full shared service arrangement that was agreed by the respective bodies (MOPAC and LFC's predecessor LFEPA) in November 2012. The new arrangements commenced on 1 November 2012 formalising the interim arrangements, for the management of the LFB Internal Audit Service that had been in place since September 2011.
- 4. The use of a risk-based approach for the annual plan is in line with current best practice and reflects the current level of risk maturity within the LFB. This approach includes providing assurance on the management and reporting of key risk and control processes and also on the effectiveness of the Risk Management Framework. This is supplemented by our own assessment of the challenges facing the Brigade as described in the corporate London Safety Plan and Transformation Delivery Plan. The draft Internal Audit Annual Plan for 2020/21 is attached as Appendix A.

Background

- 5. The need for an Internal Audit service is laid down in the Accounts and Audit (England) Regulations 2015, and the requirement for securing proper financial administration is set out in Section 127 of the Greater London Authority Act 1999. New governance arrangements were introduced in April 2018 including the creation of a London Fire Commissioner (LFC) as a Corporation Sole and a Deputy Mayor for Fire and Resilience. Responsibility for agreeing and monitoring completion of this plan now rests with the LFC who discharges this responsibility via the Commissioner's Board. As these governance arrangements continue to develop, as part of transformation delivery, there are plans to establish an Audit Committee with independent oversight responsibilities, which will help the LFC to discharge their responsibilities in line with recognised best practice.
- 6. Current best practice recommends the use of a 'Three Lines of Defence' model to help clarify roles and responsibilities for assurance provision. The first line is essentially the functions that own and manage risks. This includes the everyday supervisory activities exercised by line or operational managers. The second line oversees risk and typically comprises both risk management and compliance type functions that monitor the effectiveness of first line activity. Internal Audit have responsibility under this model for providing independent assurance as a key part of the third line. External Audit is also part of the third line. This independence assists Internal Audit to objectively examine, evaluate and report on the adequacy of management's arrangements for risk management, internal control and governance as a contribution to the proper, economic, efficient and effective use of resources. The work of Internal Audit is carried out in accordance with the Public Sector Internal Audit Standards, which have been drawn up by the Chartered Institute of Internal Audit (IIA) and the Chartered Institute of Public Finance and Accountancy (CIPFA).
- 7. Regulation 4 of the Accounts and Audit Regulations 2015 requires that 'the relevant body (i.e. the LFC) is responsible for ensuring that the body has a sound system of internal control which includes effective arrangements for the management of risk.' The LFC is also required to review at least once a year the internal control systems and make a formal disclosure statement on the adequacy of internal control.

- 8. Under the Greater London Authority Act 1999 Act the LFC must make arrangements for the proper administration of its financial affairs and its Chief Finance Officer (the Director of Corporate Services) has responsibility for the administration of those affairs. Further, it must make arrangements to secure continuous improvement in carrying out these responsibilities, having regard to a combination of economy, efficiency and effectiveness.
- 9. Internal Audit therefore has a key role to play in assisting the Director of Corporate Services to fulfil the statutory roles required by legislation. Assurance will be provided to senior management on the control mechanisms that are in place to manage key risks to delivering the Brigade's agreed plans and objectives. The review activity is supported by management's evaluation of LFB's current risks. Completion of the plan will enable the Head of Audit and Assurance to provide an opinion on the effectiveness of the control environment, which in turn will inform the Annual Governance Statement published with the Annual Accounts.

Progress on the 2019/20 Plan

10. The current 2019/20 risk-based plan was developed using Internal Audit and managements' assessment of risk and focused upon reviewing areas that are key to achieving LFB objectives and priorities. This plan maintained coverage at 773 and it is anticipated that with the exception of audits deferred by request (which have been replaced by other work) 90% of all audits within the plan will have been completed or will be at draft report stage by year end. Specific progress is reported separately in our quarterly updates.

Annual Plan for 2020/21

- 11. The following sets out the key elements of the proposed approach to the Internal Audit work programme for next year. The 2020/21 plan proposes to maintain coverage at 773 days. This takes account of the continued efficiencies in service delivery that we have achieved whilst at the same time maintaining an adequate level of audit coverage. We have also reviewed our day rates across our shared service client base which for LFB are unchanged. The effect of these proposals will be kept under review during the year as part of the usual monitoring regime.
- 12. The discrete areas included in the plan have been identified through the audit planning framework that includes analysis of risk registers and discussion with the LFC, senior managers, Directorate Board leads and Heads of Service. Due to the significant amount of work planned as part of the transformation agenda, commencing in 2020, our plan sets out a number of high-level generic areas for review that are aligned to the four pillars in the LFB transformation plan. This provides flexibility during a time of fundamental change allowing us to be more responsive to emerging risks or the assurance needs of senior management. The level of assurance will not change but the precise nature and scope of individual reviews will be determined on a quarterly basis. Although this plan is aligned to the transformation delivery plan, we have also included business as usual activity to ensure the necessary level of assurance over all areas of strategic importance is provided. This approach is in line with best practice and reflects the current level of risk maturity within the Authority.

13. Our approach includes:

a. Risk-based audits which will provide much of the evidence to support the annual opinion. These will report on the effectiveness of the controls in place to manage key risks to achieving objectives, providing assurance and identifying areas for improvement. The risk-

- based areas for 2020/21 have been selected following extensive consultation with senior management as detailed above.
- b. Follow-up reviews ensuring agreed audit actions from the audit reviews completed in 2019/20 are implemented effectively. This independent verification helps to confirm improvement in the risk and control environment and is in line with the Public Sector Internal Auditing Standards.
- c. An annual review of LFB risk management to comply with best practice. The outcome from this work helps to inform Internal Audit's view of the effectiveness of the risk management framework and their subsequent approach to planning audit work.
- d. ICT reviews utilising specialist skills (procured via the GLA framework), where appropriate, to evaluate the risks and identify any areas for improvement.
- e. Compliance type work where we look to provide assurance on the levels of compliance with LFB policies and procedures, or on the accuracy and/or completeness of recorded data. This work is usually performed in response to a specific management request.
- f. Station reviews which will combine compliance and risk based thematic activity. Although the work will focus on local delivery, corporate issues and recurring trends will be collated and reported separately.
- g. Material systems reviewing key financial systems and testing key controls on an annual basis. This work will be driven by risk analysis and liaison with the External Auditor to ensure the appropriate level of coverage is achieved.
- h. Analytical analysis the MOPAC's analytical team will interrogate and analyse key financial systems identifying potential areas of concern and providing assurance on the management of high risk/ cost and sensitive areas. They will also manage the National Fraud Initiative exercise in liaison with the Cabinet Office who have responsibility for oversight.
- i. Fraud prevention work risk awareness training/workshops will continue to be delivered to various departments and operational staff.
- j. Advising on change programmes and projects during this time of significant change Internal Audit will provide advice to senior management on key change programmes and projects. Advice on the high risk and control issues for new and developing systems will be provided at an early stage in the process.
- k. Placing increased reliance on the work of other assurance providers, where their work is of an appropriate quality and can be used for assurance purposes, to reduce the need for detailed Internal Audit analysis in that particular control environment.
- I. Counter fraud activity MOPAC's accredited counter fraud specialists who conduct investigations into fraud and abuse will be used should the need arise. In addition, analysis of the underlying risk and compliance issues that could lead to internal fraud will be undertaken to inform preventative action.

- 14. Appendix A, Table 1, provides LFC with the proposed plan for 2020/21. It sets out how the plan is designed to deliver the Internal Audit provision for the forthcoming year. This is an indicative plan which, in line with best practice, will be flexed during the year following discussion with management, to reflect emerging risks or changing risk profiles and/or business priorities. To facilitate this, some reviews are shown within the plan as 'scope to be determined' and it is our intention to agree the timing, nature and objectives of these reviews with the respective business lead prior to the commencement of each quarter. This allows us to adapt to the anticipated pace of change and to ensure we are able to provide appropriate assurance over the areas of strategic importance.
- 15. The first section, which is aligned to the four pillars, sets out the risk-based audit areas, thematic reviews and compliance type work that will be reviewed including first time and follow up assurance activity. This approach, drawing on CIPFA and IIA best practice, includes generic areas, individual reviews within or across business areas, a review of the risk management process and key financial systems. For this year there is an emphasis on governance and transformation activity as the LFB commences its radical transformation agenda although we will continue to include business as usual activities to provide holistic assurance across the LFB. Unless denoted otherwise, the reviews in this section have been suggested by the respective lead department.
- 16. Appendix A, Table 2, details LFB's corporate risks. Links to LFB corporate risks are shown where appropriate to inform areas of potential audit scope. Our proposed audit plan for 2020/21 includes coverage of both corporate and departmental risks, and there is a brief explanation alongside each proposed risk-based assurance review setting out why this area has been chosen. Assurance will continue to be provided over key material systems which will supplement the work undertaken by External Audit. Terms of Reference will be agreed with senior managers and the Head of Service for each area under review before the review commences and clearly defining the full scope. Once an audit review has been completed, the draft report containing our conclusions on the control framework will be produced and discussed with all relevant parties, with dates for implementation of agreed actions.
- 17. The second section sets out the audit provision within specialist areas. This includes counter fraud work using our internal team of counter fraud professionals and data analytical work. The fraud analysis and awareness work will continue to build on work undertaken in previous years highlighting fraud prevention and detection. This section also sets out our provision for internal audit advisory work. The allocation will be used primarily to advise management as they develop systems and activities to support the transformation agenda. It also includes work around strategy development and HR change projects. To maintain audit independence and objectivity, in line with best practice, Internal Auditors providing risk and control advice in these areas will not undertake future assurance reviews in the same areas.
- 18. All final internal audit reports will be distributed to the Commissioner, Director(s) and Head(s) of Service (as appropriate) and External Audit, and also to the Assistant Director Strategy and Risk to provide independent assurance over the strategic risk mitigations covered by the review.
- 19. The Internal Audit service continues to be delivered using the collective knowledge, skills and experience available under the shared service arrangement. This has raised awareness of the Internal Audit function throughout the Brigade and has led to the greater involvement of senior managers in the audit process. It has also led to more in-depth discussion about both the focus of the audits and the agreed actions required. The risk-based approach provides assurance on the

areas, functions and activities that are working well within the authority but also highlights some issues that require management action to mitigate the risks identified. This allows prompt action to be taken to address the risk and control issues that are highlighted and is a key component of an effective governance framework.

20. The plan covers a broad range of operational and specialist areas and whilst Internal Auditors do not have the detailed knowledge of someone working in these areas, they are able to apply their professional knowledge of risk and control to any process. They look for assurance that the controls established by management are appropriate and proportionate to manage the risks. It is not in their remit to question operational decision making but they look to provide assurance that suitably skilled and experienced managers make those decisions using accurate and up to date information.

LFB's Strategic Objectives

21. This report presents Internal Audit's plan for 2020/21 and discharges the requirement under the Financial Regulations, paragraph 13, to report this to the LFC before the commencement of the financial year. In addition, the audits set out in the plan are intended to help the LFB to achieve its strategic aims and objectives by evaluating and improving the effectiveness of risk management, internal control and governance processes.

Finance comments

- 22. Under the Accounts and Audit Regulations 2015, a local authority must ensure it has a sound system of internal control which:
 - facilitates the effective exercise of its functions and the achievement of its aims and objectives;
 - ensures that the financial and operational management of the Brigade is effective; and
 - includes effective arrangements for the management of risk.
- 23. In carrying out their duties Internal Audit plays a key role against regulation 5 in helping management to discharge their responsibilities by evaluating the effectiveness of internal control, risk management and governance processes.
- 24. The Internal Audit arrangements are carried out under a shared service arrangement with MOPAC and the audit reviews are agreed as part of the annual audit plan and managed within the approved budget.

Workforce comments

25. There are no workforce related issues associated with this report.

General Counsel's comments

- 26. The report seeks approval of the Internal Audit Annual Plan 2020/2021 attached at Appendix A.
- 27. Section 5 of the Audit and Accounts Regulations 2015 sets out the London Fire Commissioner's obligations (as a 'relevant authority') to undertake an effective internal audit to evaluate the effectiveness of its risk management, control and governance processes, taking into account public sector internal auditing standards or guidance.

- 28. Under an agreement dated 26 November 2012 the Mayor's Office for Policing and Crime discharges of functions in respect of Internal audit functions by on behalf of the Commissioner.
- 29. The Financial Regulations under part 6 of the Scheme of Governance sets out the functions to be performed by the internal audit team. In particular, paragraph 13(m) of the Financial Regulations requires the Director of Corporate Services agrees the draft audit plan prior to the approval by the Commissioner.
- 30. This report attaching the draft annual internal audit plan is provided in accordance with the aforementioned legislative and governance requirements, and falls within the Commissioner's powers.

Sustainability implications

31. There are no sustainability implications associated with this report.

Equalities implications

- 32. This report has The London Fire Commissioner and decision takers are required to have due regard to the Public Sector Equality Duty (s149 of the Equality Act 2010) when taking decisions. This in broad terms involves understanding the potential impact of policy and decisions on different people, taking this into account and then evidencing how decisions were reached.
- 33. It is important to note that consideration of the Public Sector Equality Duty is not a one-off task. The duty must be fulfilled before taking a decision, at the time of taking a decision, and after the decision has been taken.
- 34. The protected characteristics are: Age, Disability, Gender reassignment, Pregnancy and maternity, Marriage and civil partnership (but only in respect of the requirements to have due regard to the need to eliminate discrimination), Race (ethnic or national origins, colour or nationality), Religion or belief (including lack of belief), Sex, Sexual orientation.
- 35. The Public Sector Equality Duty requires us, in the exercise of all our functions (i.e. everything we do), to have due regard to the need to:
 - (a) eliminate discrimination, harassment and victimisation and other prohibited conduct.
 - (b) advance equality of opportunity between people who share a relevant protected characteristic and person who do not share it.
 - (c) foster good relations between people who share a relevant protected characteristic and persons who do not share it.
- 36. Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:
 - (a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic where those disadvantages are connected to that characteristic;
 - (b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;

- (c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
- 37. The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.
- 38. Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to
 - (a) tackle prejudice, and
 - (b) promote understanding.
- 39. An Equality Impact Assessment (EIA) has not been undertaken.
- 40. An EIA was not required because this is the presentation of the draft annual plan for work to be undertaken by Internal Audit during 2020/21which does not directly impact staff.

List of Appendices

Appendix	Title	Protective Marking	
Α.	Draft Annual Plan for 2020/21	Not protectively marked	

Section 1

Risk-Based, Thematic and Compliance - Assurance Reviews

Pillar 1 - The best people and the best place to work

Audit Title	Summary Explanation for Area of Review	Lead Department and/or Suggested by	Link to Corporate/ Departmen tal Risk/s	Total Days
Performance Framework	Scope to be agreed during the year.	AD People Services	All	20
Workforce Planning	Reviewing the framework for aligning the workforce resources with the needs and priorities of the LFB.	IA	CRR 10	20
Training	Scope to be confirmed during the year.	AD Training and Prof Dev AC Op Policy and Assurance AC Control and Mobilising	CRR 33 CRR34	20
Leadership programme	Scope to be confirmed during the year.	AD People Services AD Training and Prof Dev	All	20
Diversity and Inclusion	Scope to be determined during the year.	Internal Audit	CRR8	20
Pillar 1 Total				100

Section 1

Risk-Based, Thematic and Compliance - Assurance Reviews

Pillar 2 - Seizing the Future

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Audit Title	Summary Explanation for Area of Review	Business Lead	Link to Corporate/ Departmen tal Risk/s	Total Days
Transformation Assurance	Reviewing the framework for monitoring and assuring programme delivery.	Transformation Director	CRR 26 CRR29 CRR 24	30
ICT Reviews	Programme of Specialist Reviews to be agreed during the year but could include: Digital Transformation Cyber Security Dark Trace Mobile Technology	Chief Information Officer	All CRR22	40
Governance Arrangements	Programme of reviews potentially looking at structures, decision making and organisational learning.	General Counsel	All	60
Pillar 2 Total				130
Total CF				230

Section 1

Risk-Based, Thematic and Compliance - Assurance Reviews

Pillar 3 - Delivering Excellence

Pillar 3 - Deliverir	ng Excellence			
Audit Title	Summary Explanation for Area of Review	Business Lead	Link to Corporate/ Departmen tal Risk/s	Total Days
Control and mobilising Improvement plan or Command and Control – incident response	Scope to be agreed.	AC Control and Mobilising /AD Training and Prof Dev	CRR 19 27	20
Contract Management	Ongoing reviews of contract management arrangements within the Brigade selecting a key contractual relationship during the year e.g. Capital Guard.	AD Procurement Technical and Serv Supp	CRR7	20
Risk Management Framework	Annual review of an aspect of risk management looking at an individual risk or the framework itself.	AD Strategy and Risk	All CRR 18	20
Wellbeing Strategy	Reviewing the arrangements for ensuring the provision of appropriate and timely support to individuals and peer support network.	AD People Services	CR 20 CRR 23	20
Assurance Framework and Quality Assurance	Reviewing the effectiveness of the assurance framework and QA programme.	AC Op Policy and Assurance	All	20
Station Thematic Reviews	Cross cutting reviews across stations to identify common themes and issues arising. Scope to be agreed during the year with senior operational managers but could include: Compliance with Fire Safety Standards	AC Fire Stations	All	60
Pillar 3 Total				160
Total CF				390

Section 1				
Risk-Based, The	natic and Compliance – Assurance Re d facing	views		
Audit Title	Summary Explanation for Area of Review	Lead Department and/or Suggested by	Link to Corporate/ Departmen tal Risk/s	Total Days
Community Engagement	Scope to be agreed during the year but could include review of Borough Commander training, initiatives to improve public confidence.	AD Communications	CRR 29	20
Outreach programmes	Scope to be agreed during the year but could include the Blue Light Prevention Mobilisation Hub.	AC Fire Stations AD Training and Prof Dev Suggested LFC	CRR 29	20
Pillar 4 Total				40
Total CF				430

Section 1	
Follow Up Reviews	
Audit Title	Total Days
Follow up of the previous reviews to verify the status of agreed actions. To include: Babcock Contract Management Review Data Protection Compliance Framework Environmental Management Systems Fire Safe and Well Pilot Fire Safety Enforcement Framework Follow Up Environmental Management Systems Follow Up of Assurance Framework Follow Up of Disciplinary Framework Follow Up of Processing the GLA Payroll Follow Up of Use and Control of Credit Cards ICT Network Resilience/ Topography Identification and Management of High Risk Legal Cases Management and Control of Counter Terrorism Funding Overtime at Protective Equipment Group (Advisory) Risk Maturity Assessment Road Safety Act 2016 - Section 19 (Advisory)	100
Follow Up Total	100
Section 1 Total	530

Section 2			
	ramme including Counter Fraud Activity, Data grammes and Control Advice	a Analytics, Ad	visory
Activity Type	Outline Description of Activity	Link to Key Corporate/ Department al Risks (where appropriate)	Total Days
Counter Fraud Activity	 A range of work including prevention, awareness, detection and investigation activity. This will include: A scheduled programme of fraud awareness workshops. A data analytical programme using specialist software to interrogate and match large volumes of data. Counter Fraud Investigations 	All	60
Estates Strategy	Input into the framework for the development of the Estates Strategy.	All	20
Advisory Work Programme	Internal Audit will provide advice and assistance on change programmes and projects. By its very nature, this is a dynamic environment and the scope of this work will be determined during the year but could include: External review implementation plans Business processes Strategy development including the Fire and Community Safety Strategy as set out in LSP	All	60
Audit Planning, Reporting and Client Liaison	N/A	N/A	60
Liaison with other Assurance Providers including Health and Safety and Sustainable Development Teams	Assessing the methodology of other assurance providers to determine the degree of reliance that can be placed on their work. This reduces possible duplication and improves the coordination of activity.	All	20
Contingency	This contingency is used where necessary to supplement planned audit work if circumstances arise that require further audit coverage or assurance in high risk areas		23

Internal Audit - Draft Annual Plan for 2020/21

Appendix A (Table 1)

	including within the key material systems.	
Section 3 total		243
Cumulative Total		773

Ref	Risk Description
CRR1	A death or serious injury occurs as a result of our staff not operating a safe system of work
CRR7	Failure of a significant contractual relationship impacts on the delivery of services
CRR8	The actions arising from the inclusion strategy fail to deliver a more diverse workplace
CRR10	The current environment doesn't support effective planning to meet the budget gap forecast in 2022/23
CRR13	A breakdown in industrial relations affects our ability to deliver the service
CRR18	The current asymmetric threat to London and the UK and London potentially exposes a level of vulnerability which could result in increased levels of risk.
CRR19	Complete failure of the Brigade's mobilising system for periods over 24 hours in duration
CRR20	The Grenfell inquiry process impacts on staff/officer wellbeing resulting in an increase in officers unavailable for key roles and reducing the resilience of the service
CRR21	The Brigade's Adult Safeguarding Framework does not support effective and efficient referrals to appropriate agencies to adequately support the needs of vulnerable people
CRR22	Brigade ICT services are affected by a cyber attack
CRR23	Staff do not get support their mental health problems which negatively affects individual wellbeing and organisational effectiveness
CRR24	Our capacity to deliver change is exceeded meaning that benefits are not fully delivered
CRR25	Brigade services are vulnerable to a pandemic outbreak
CRR26	HM Inspection results in areas of the service receiving a poor or inadequate rating which reduces public confidence in LFB
CRR27	The resilience of the Brigade is impacted by a series of large-scale major incidents, potentially terror related
CRR29	The Grenfell Tower Fire Public Inquiry results in conclusions about Brigade policies or actions which reduce staff/public confidence and/ or public safety
CRR30	High sickness levels result in a reduction in operational resilience
CRR32	Newly commissioned training requirements are not accurately planned, specified, or evaluated
CRR33	The training provider is unable to provide effective and efficient training to deliver the Brigade's needs

Appendix A (Table 2)

CRR34	Non contracted training provision does not effectively and efficiently secure maintenance of skills
CRR 35	UK leaves the EU causing disruption to communities, infrastructure or costs sufficient to challenge LFB service delivery through disruption to services, suppliers, or by demand increase.
CRR 36	Brigade Control training and quality assurance processes are currently not subjected to external scrutiny or rigour, which leaves the Brigade open to challenges about the competency of its Control officers.