



**CabinetOffice**

**Government Response to the Public  
Consultation on the Revised Guidance on**

**Local Responder Risk Assessment Duty under  
the Civil Contingencies Act 2004**

## Introduction

1. *Emergency Preparedness* is the statutory guidance relating to Part I of the Civil Contingencies Act 2004 and its supporting regulations. As part of the Civil Contingencies Act Enhancement Programme (CCAEP) the guidance is being updated to introduce greater clarity and to reflect new practices and arrangements. These changes are aimed at better supporting responders to fulfil their duties under the Act.
2. Chapter 4 contains an overview of how risk assessments for both hazards and threats should be conducted. It also gives details of the information that Local Resilience Forums (LRFs) can use to inform their risk assessment. This includes the Local Risk Assessment Guidance, the Local Planning Assumptions Guidance, the restricted National Resilience Planning Assumptions (NRPAs), the National Risk Register and, for the first time, the National Risk Assessment and confidential NRPAs, which are now held by all UK Police Forces.
3. The chapter now refers to longer term contextualisation: responders should continue to focus on the five year horizon, but with an eye to longer-term issues, including a specific reference to climate change.
4. The importance of the Community Risk Register (CRR) has also been given greater emphasis as a mechanism for engaging with the local community. The aim of this is to facilitate and support the building and enhancement of community resilience.
5. More case studies have not been included but will be made available on the National Resilience Extranet where they can be refreshed regularly and kept relevant.
6. The consultation, which ran from Wednesday 6th July to Tuesday 27th September 2011, was announced on the CCS Gateway and made available on the Cabinet Office UK resilience website and the National Resilience website. 57 of the 86 respondents who responded to the consultation expressed an opinion on this chapter.

**Table 1: Organisations who responded to the consultation by CCA category**

CCA Category	Class	Number
Category 1 responders	Environment Agency	1
	Fire and Rescue Services	9
	Local Authority	19
	NHS	4
	Police Forces	2
Category 2 responders	Transport organisations	2
	Utilities	7
Voluntary Sector		2
Individual		1
Government Department		0

<b>CCA Category</b>	<b>Class</b>	<b>Number</b>
Other	Associations	3
	Regulators	0
	Local Resilience Forums	7

The detailed list of organisations is shown in Annex A.

**Table 2: Responses to the Consultation**

<b>No.</b>	<b>Question</b>	<b>Content % (number)</b>	<b>Not content % (number)</b>	<b>No opinion/Don't Know % (number)</b>
1	Do you think the updated guidance on; 'including threats in the local risk assessment' is sufficiently comprehensive and helpful?	75.4 (43)	7.0 (4)	17.6 (10)
2	Does the reference to the provision of copies of the full National Risk Assessment and the National Resilience Planning Assumption to all UK Police Forces meet your needs in this area?	49.1 (28)	15.8 (9)	35.0 (20)
3	Do you think the additional information provided on longer term contextualisation of risk is helpful and will assist you in the fulfilment of your duty?	68.4 (39)	5.3 (3)	26.3 (15)
4	Do you feel the inclusion of case studies would be beneficial in helping you develop your plans?	79.3 (46)	3.4 (2)	17.2 (10)
5	Does the guidance clearly explain how the Community Risk Register (CRR) can be used as a mechanism to support community engagement and the building of community resilience?	59.6 (34)	19.3 (11)	21.0 (12)
6	Have you used the CRR as a mechanism to support community engagement and the building of community resilience?	47.4 (27)	26.3 (15)	26.3 (15)

## Summary

- 75% of respondents agreed that the updated guidance on including threats in the local risk assessment was helpful, with 60% agreeing that it clearly explained how the Community Risk Register (CRR) could be used as a mechanism to support community engagement and the building of community resilience.
- Provision of copies of the full National Risk Assessment and the National Resilience Planning Assumption to all UK Police forces was widely seen as a positive step. However, there was concern in some areas that this information was not being shared as fully as it should with the LRF despite explicit instructions in the accompanying guidance.
- Putting plans into longer term contextualisation was seen as helpful in determining and developing resilience measures; and there was general support for the provision of case studies showing how others carried out their duties and as examples of best practice.

## Detailed Responses

### **Q - Do you think the updated guidance on 'including threats in the local risk assessment' is sufficiently comprehensive and helpful?**

- 75% of respondents agreed that the updated guidance was helpful.
- One responder commented that the inclusion of threats brought more realism than previously; another that it would promote greater joint planning and working across responders; and a third that it would spread knowledge of threats across a wider audience.
- Improvements in the inclusion of Category 2 responders were seen as a positive step in improving relationships and facilitating better information sharing.
- One responder commented that NRA planning scenarios should be formulated to specific local conditions rather than arbitrary national averages. However, LRFs should be using the generic statement in the Lrag as a guide to tailor their specific area.

### **Q - Does the reference to the provision of copies of the full National Risk Assessment and the National Resilience Planning Assumption to all UK Police Forces meet your needs in this area?**

- 49% of respondents said they were content with this arrangement; that it would help inform local risk assessment, and support the work of the multi-agency Risk Group.
- 16% expressed concerns over access to, and sharing of, information between responders. There were a number of comments and concerns around this issue including –

- security classification/restriction on the document was counter-productive both to multi-agency working and the process of completing a CRR, and that if this is retained then an additional document should be produced which can be shared with all LRF members;
  - the NRA should be issued to all responding partners not just the police;
  - access to the document had not been readily available; and
  - a perception that the police are ‘over-protective’ of the NRA.
- It should be noted that the current arrangement is that the National Risk Assessment (NRA) is issued solely to all UK Police Forces; however, the accompanying guidance is explicit that this information is to be shared with all the Local Resilience Forum members.

**Q - Do you think the additional information provided on longer term contextualisation of risk is helpful and will assist you in the fulfilment of your duty?**

- 68% of respondents felt that putting plans into longer term contextualisation would be helpful in determining and developing resilience measures,
- Two respondents particularly welcomed the change in the guidance to include longer term contextualisation along a 20 year horizon as this aligned with the strategy for flood and coastal risk management and water resource planning, which look at long-term investment in infrastructure and rely on long-term risk assessments and an assessment of the impacts of climate change.
- Another felt that the linkage to the National Security Risk Assessment would focus Community Risk Register groups on undertaking risk assessments with a long term view.
- One responder felt that the risk profile should also be reflected in the opposite direction i.e. what does the historical CRR look like now in a present-day snapshot.
- However, another responder felt it was difficult to assess the likely local impacts of longer term and ambiguous risks such as climate change. While another questioned how longer term priorities would be ranked against shorter term risks and objectives. It should, however, be noted that this is not a statutory duty, just an aid when assessing risks.

**Q - Do you feel the inclusion of case studies would be beneficial in helping you develop your plans?**

- 79% of respondents agreed that case studies would be beneficial as they can assist practitioners who are new to the role, as well as allowing more experienced practitioners to benchmark against a neighbouring LRF and compare best practice. They can also be useful in introducing an element of standardisation.

- There were specific requests for the inclusion of case studies that looked at the role of Category 2s.
- There were also requests to ensure that the studies were relevant, not all London-centric or based around small villages. There would also be an interest in showing approaches that had been unsuccessful or failed, as a way of demonstrating how to avoid the same mistakes.
- It has been decided not to include additional case studies in Chapter 4 but to make them available on the NRE as soon as suitable cases are sourced.

**Q - Does the guidance clearly explain how the Community Risk Register (CRR) can be used as a mechanism to support community engagement and the building of community resilience?**

- 60% of respondents felt the revised guidance was clear. However, one responder felt that further clarity was required, while another felt it was written from a London/Government viewpoint which was not always relevant and useful.
- One responder commented that it is recognised that the CRR should be used in this way, however due to the nature of some of the information contained within the CRR it may be difficult to share this information for this purpose.
- Another thought it was helpful in that it gave very generic guidance, but some more direct advice would be helpful.
- One respondent thought it would be useful to include in the 'glossary' the definition of community engagement because an objective assessment may make the determination of community engagement more problematic in large highly populated areas.
- It was generally felt that case studies would be beneficial, and these will be made available on the NRE. Responders will also be invited to share information on the above areas in the linked discussion forum.

**Q - Have you used the CRR as a mechanism to support community engagement and the building of community resilience?**

- 47% of respondents agreed they had used the CRR to support community engagement. This included
  - encouraging communities to look at their local risks, and include relevant information within the community resilience plans
  - providing the basis from which testing was done with subsequent engagement of the community;
  - the top 20 risks in the borough linked to the Community Risk Register, with relevant sub groups then progressing the work;
  - planning for serious road and aviation accidents by going through a process of multi agency engagement and consultation to reflect community needs and subsequent engagement;
  - community engagement work carried out on flood awareness through involvement at the LRF;

- information on flooding and seasonal events such as heat wave and drought being passed to the community.
- One Category 2 responder surveyed the CRRs from a number of counties to inform a guidance assessment which can then be provided to local Risk Assessment Working Groups (RAWG) to assist in their assessments of water related risks.
- One responder, however, had sought on several occasions to engage with local communities e.g. parish councils and neighbourhood watch schemes to enhance community resilience but with little or no success. Their lack of success seemed to arise from a combination of a lack of appreciation of risks, and the perception that "it won't happen to me" and/or "if it does, someone else will sort it out".

**Q - Is there anything further you would like to see in Chapter 4?**

- 15 respondents replied to this question however, a number were duplications of issues raised previously, such as a call for case studies and access to the NRA; others are addressed by guidance in other chapters of *Emergency Preparedness*; or would require legislative change which would not be appropriate at this stage.
- One respondent suggested that the frequency of risk assessment should be mandated; another suggested a reduction in the number of LRFs, with improved cross-border and multi-LRF working.
- One response suggested greater emphasis was needed on Category 2 responders providing more information on the risks they manage, particularly for utility based risks where the likelihood and impacts were understood more fully by the utility companies.

**List of Respondents**

**Anglian Water Services Ltd**  
**ATOC Ltd. (Association of Train Operating Companies)**  
**Bedfordshire LRF**  
**Beds and Luton FRS**  
**Birmingham City Council**  
**Bradford Council**  
**Bristol Water plc**  
**Cheshire local resilience forum**  
**City of London Police**  
**Cleveland Emergency Planning Unit and LRF**  
**Continuity Forum**  
**Cornwall Council**  
**County Durham and Darlington Local Resilience Forum**  
**East Staffordshire Borough Council**  
**East Sussex Fire and Rescue Service**  
**Emergency Planning Shared Service Rotherham and Sheffield**  
**Emergency Planning Society - West Midlands Branch**  
**Environment Agency**  
**Great Ormond Street Hospital**  
**Hampshire Fire and Rescue Service**  
**Health Protection Agency**  
**Heathrow Travel Care**  
**Hereford & Worcester Fire and Rescue Service**  
**Hertfordshire County Council**  
**Highways Agency**  
**Humber Emergency Planning Service (joint local authority team)**  
**International Association of Emergency Managers (IAEM)**  
**Lancashire County Council**  
**Lancashire Fire and Rescue Service (LFRS)**  
**London Borough of Barnet**  
**London Borough of Hillingdon**  
**London Fire Brigade**  
**Merseyside Fire & Rescue Service**  
**Metropolitan Police Service**  
**National Grid**

**Network Rail Infrastructure Ltd**

**NHS Sussex**

**NHS Sussex (Sussex PCT Cluster)**

**North Yorkshire County Council Emergency Planning Unit. Also on behalf of:**

**NYCC Health and Adult Services and City of York Council EPU**

**North Yorkshire Fire and Rescue Service**

**Northumbrian Water Limited**

**Oxfordshire County Council**

**Plymouth City Council**

**Private individual**

**South Yorkshire Local Resilience Forum**

**Southampton City Council Emergency Planning Unit**

**Southern Water Services Ltd**

**Staffordshire Civil Contingencies Unit (CCU)**

**Suffolk Resilience Forum**

**Surrey County Council**

**Sussex Resilience Forum**

**Thurrock Council**

**United Utilities**

**Water UK**

**West Yorkshire Fire & Rescue Service**

**West Yorkshire Resilience Forum**

**Worcestershire County Council**