Cabinet Office

Annex 7 D: Duty to communicate with the public – The Ten Step Cycle

Revision to *Emergency Preparedness*

Civil Contingencies Act Enhancement Programme

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The Ten Step Cycle – Guidance Note

The following Ten Step Cycle has been designed to assist Local Resilience Forums (LRFs) in implementing the Communicating with the Public duty, as laid down in the Civil Contingencies Act (2004).

The CCA states that Category 1 responders should:

- maintain arrangements to warn, and provide information and advice to, the public if an emergency is likely to occur or has occurred;
- put in place arrangements to make information available to the public about civil protection matters.

The Ten Step Cycle can be used by LRFs in a number of ways. The following are examples:

i) LRFs can work through the Ten Step Cycle step-by-step, in the same way LRFs approach the Risk Assessment duty.
ii) put LRFs can choose to use the Ten Step Cycle, alongside the Expectations and Indicators of Good Practice for Category 1 and 2 responders, as a guide and barometer, dipping in and out at various steps as required.

Ultimately, LRFs will reach the final step, and will have taken a big stride towards implementing a full set of warning and informing arrangements, which are fit for purpose and in line with the risks, set out in their Community Risk Register (CRR). This process will help local communities better understand the risks they face, and the actions they need to take in the event of an emergency. At that stage, as in all aspects of emergency planning, LRFs will find themselves back at

the beginning, and following a review of the work carried out previously, will be ready to start the Ten Step Cycle once more.

The Ten Step Cycle for Communicating with the Public

Step 1

a) Establish a Public Warning Task Group as a subgroup of the LRF General Working Group.

The LRF will need to set up a multi-agency task group to take this work forward, ensuring that it has a representative from all Category 1 responders - the duty applies to all of them. The LRF should consider inviting emergency planning officers, communications professionals, members of local and regional media, as well as appropriate Category 2 responders. Not only will this enhance partnership working and governance, but will allow the LRF to explore all possible solutions in making recommendations on possible control measures in this area.

b) Establish an audit process – rationale for decisions made

This is obviously important with any emergency planning process but the LRF should establish an auditing process to log all decisions that are taken, and processes followed throughout this cycle. This will help the LRF to review progress, answer Freedom of Information (FOI) enquiries and any other queries received, as well as helping to support any post-incident reviews.

Step 2

Use the Community Risk Register as the task group's starting point:

- **What is the Emergency Risk Management Context for the LRF area?** Is the LRF area urban or rural in nature? Consider the geographical profile of the landscape in the LRF area. What hazards do the LRF need to manage – are there main rivers prone to slow-onset riverine flooding, for example, or streams that are prone to flash flooding? What is the infrastructure like – motorways or B-roads? Do the LRF have large international communities where English may not be the first language? Asking such questions about the Emergency Risk Management Context will enable the LRF to set the background against which the task group will work, and allow the LRF to identify the most appropriate control measures for the area, the hazards, and the public.

- **What are the timescales and impact for each risk?**
  Assess the warning and informing timescales for each hazard, using the outcome descriptions from the CRR as a guide – what are the warning periods for each, or does the hazard have no-notice characteristics? Identifying these factors will also assist the task group to identify the most appropriate control measures against each hazard.

- **What are the priorities identified within the CRR?**

  The task group should familiarise itself with those hazards which require the most urgent risk treatment to be carried out on them in relation to warning and informing control measures. This will obviously have a bearing on any future recommendations to the LRF regarding proposed control measures.

Step 3

Identify and agree the lead responders for each risk in the Community Risk Register

- **Purpose of appointing lead responders**

  Why do LRFs need to identify lead responders? Firstly, the Civil Contingencies Act (2004) states that LRFs are required to identify those Category 1 responders who will take the lead in maintaining arrangements to warn and inform and educate the public, and educate the public about risks and other civil protection matters, for each risk identified in the LRF Community Risk Register (CRR).

However, in communicating with the public, there is a need to avoid causing confusion during an incident, and in the absence of a lead responder, every Category 1 responder would be obliged to issue warnings, thereby increasing the potential for confusion. Identifying lead responders also helps to avoid duplication of effort – there is no sense in all agencies using valuable resources to issue the same warning and / or information.

In short, selecting lead responders to maintain arrangements for warning and informing the public helps the LRF to ensure that the public receives consistent and agreed safety information from a lead source only. This can play a significant role in mitigating the impact of an emergency on a community.

- **Regulations require Category 1 responders to have in place a mechanism for selecting lead responders either (a) in advance, or (b) at the time of an incident.**

The ideal scenario is that the LRF will select lead responders in advance (i.e. before an emergency occurs). This will not only save the multi-agency tactical command valuable time during a major incident, but will also smooth the path to full implementation of the duty as a whole. Agreeing lead responders in advance for each risk in the CRR will enable the LRF to put in place a minimum number of warning protocols, thus keeping the process as simple as possible. Crisis management can be challenging enough without having to go through the process of choosing a lead responder at the same time.

However, if the LRF cannot agree on lead responders in advance, or indeed would prefer to leave it until the response phase of an incident, mechanisms must be put in place to allow that decision-making process to take place effectively when it is required.

- **Regulations permit Category 1 responders to have a mechanism for changing the lead as the emergency evolves.**

As an incident proceeds through the response phase to recovery and beyond, the lead responder for warning and informing may need to change, and the Civil Contingencies Act allows for mechanisms to be established enabling these changes to be made. For example, at the conclusion of the response to a flood incident, the police may pass management of the incident to the relevant local authority (as was the case during the Carlisle floods in 2005). This might also be the appropriate time to change the lead responder for warning and informing the public, in this case from the police to local authority.

NOTE: It is important to note that the lead responder is not expected to carry out the maintenance of warning and informing arrangements in isolation. The communicating with the public duty falls to all Category 1 responders. The lead responder concept steers LRF partners to provide support, advice and guidance to those agencies designated as lead responders throughout all stages of the disaster cycle. Partnership working is critical to success in implementing this duty effectively by assessing procedures against the risks identified in your CRR. This will help to ensure that the right messages are issued to the right people at the right time and help to promote a co-ordinated approach to communicating with the public.

Choosing the LRF's lead responders

The following steps provide LRFs with a simple process for selecting lead responders for warning and informing the public. Although this may seem a challenging task at first, it can actually be relatively straight forward if task groups follow the simple steps below:

- Call together a specific 'Task & Finish' session for the LRF Public Warning Task Group, ensuring that all Category 1 responders are present – over the course of the next couple of hours, the task is to assign a lead responder agency against each of the risks contained in the LRF's CRR.
- Ensure that copies of the CRR are available with an additional column added, so that task groups can insert the agreed lead responder for each incident phase as the process develops.
- Now, with one task group member taking the lead, 'walk through' each risk scenario, analysing every phase of the disaster cycle, and deciding which agencies have a role as lead responder as the scenario / incident evolves. These agencies should then be inserted into the amended CRR table. The task group will also have to identify trigger points for the handover of the lead responsibility for warning, informing and advising from one responder body to another, and the procedures to achieve this (see Annex 7C).

However, the task group, where possible, should attempt to select one overall lead responder to take the lead against each risk, to ensure arrangements are maintained, and most importantly, to issue warnings during the immediate aftermath of an incident being declared (no-notice), or in the period prior to a potential incident (notice), to prevent imminent danger to life and property. This agency is the lead responder for both the planning, and immediate emergency response phase. As stated above, they should expect the full support of all Category 1 responders in undertaking this role.

The following scenarios are provided as examples – one notice type scenario (Flooding – major fluvial), and one no-notice (toxic release).

Notice type scenario: Flooding – major fluvial

- **Outcome description (taken from CRR):** Sustained period of heavy rain for two weeks; rising river levels over all regions; thousands of properties affected for 7 to 21 days; some risk to life; impact on roads and rail infrastructure.
- **Pre-flood:** right up to the point where the water is about to breach the river banks, the Environment Agency (EA) will have issued a series of warnings to the public and other key stakeholders (i.e. Flood Watch, Flood Warning, and Severe Flood Warning). Therefore, the EA as the lead responder at this stage is the agency best placed to issue an alert in the run-up to the incident.
- **Flood response:** once the multi-agency response is activated, and the emphasis changes to consequence management, the Police will coordinate all public safety messages, to ensure that a common message is being transmitted. In addition, all other Category 1 responders will be communicating with stakeholders that are specific to their own individual organisations (e.g. local authorities will communicate with their internal services, the voluntary agencies, schools, residential care homes, and elected members). Once the flood situation has receded, the EA will then issue an 'All Clear' message. At this stage, as the incident enters the recovery phase, the lead responder role will probably change from police to local authority.

- **Outcome?** In this example there are three major changes in lead responder for this scenario: Environment Agency – police – local authority. However, from a preparedness perspective, the task group may wish to select one agency to take the lead. Its role would be to lead on the preparations for (a) maintaining arrangements to warn and inform, and (b) to educate the public about risk. However, as indicated above all other Category 1 responders would have a duty to assist that lead agency in completing these tasks.

No-notice type scenario: Toxic release

- **Outcome description (taken from CRR):** Toxic chemical release, up to 3 km from site, resulting in a number of fatalities and casualties.
- **Pre-incident and response:** There are three types of scenario considered here: the first is where the site is known, and is operated by a company governed by the COMAH, REPPIR, or PSR Regulations. The second involves a site that is not known, and is not governed by the aforementioned Regulations.[1] And finally, the third is a 'mobile incident' – in other words, a tanker, ship, and rail carriage – an incident that can occur anywhere and at any time.

Consider scenario 1. The site operator/ pipeline owner has a duty under COMAH / REPPIR/ PSR to provide safety information to the public working in, living in, or passing through its Public Information Zone (PIZ). This frequently takes the form of calendars and/ or letters. The site operator / pipeline owner also has a duty under the above legislation to warn the public of a major accident when they occur. However, the task group still needs to designate a lead responder(s) to ensure that warning and informing arrangements are maintained – this might involve site visits, assessment of existing warning infrastructure, and provision

[1] Radiation (Emergency Preparedness and Public Information) Regulations (2001) (REPPIR); Control of Major Accident Hazards Regulations (1999) (COMAH); Pipelines Safety Regulations (1996) (PSR).

of safety information outside of the PIZ. Again, the task group should walk-through the scenario – in the pre-incident phase, all Category 1 responders could theoretically take a lead role.

As an example, Cheshire LRF has agreed that the police will be the lead responder agency for several scenarios involving COMAH, REPPIR, and Major Accident Hazard Pipelines. In that case, the task group agreed that the police would be the lead responder for warning and informing during the response phase, as local arrangements require that agencies coordinate all safety messages issued to the public for these types of incident (whether supplementary to the operator's initial warning, an initial warning as a result of an operator's failure to warn, and / or subsequent safety action information, such as 'Go In, Stay In, Tune In'. In the recovery phase, the lead responder changes to the local authorities, with key input from healthcare agencies.

- **Outcomes?** In this example, there are two major changes in lead responder for this scenario: police – local authority / health agencies. Again, from a preparedness perspective, the task group may wish to select one agency to take the lead. Its role would be to lead on the preparations for (a) maintaining arrangements to warn and inform, and (b) educating the public about risk. And as indicated above, all the other Category 1 responders would have a duty to assist that lead agency in completing these tasks.

It is likely that, as the task group assesses through each hazard sub-category, they will find that a natural rhythm develops within the task group, with patterns emerging as they proceed. The key factor to remember is that this is very much a partnership exercise with support flowing from all partners involved in managing communications in an emergency. Even if a particular Category 1

responder is assigned more lead responder tasks than another, it should expect to receive the full support and cooperation of all other responders.

The selected lead responders need to be recorded on the LRF's adapted Community Risk Register.

Step 4

Carry out a gap analysis:

- **What systems and arrangements are already in place in the LRF area?**
- **What level of capability is in place already and what are the limitations?**
- **Where are the gaps in local capability?**

To develop effective plans and deliver suitable warning and informing arrangements, it is important to assess the existing capabilities and limitations for communicating with the public against the risks that have been identified in the LRF area. By carrying out this analysis the LRF will be able to establish a baseline set of existing control measures to compare against the risks identified in the CRR which can then be built upon further into this cycle.

After mapping out existing capability, the task group should make a considered judgement as to the gaps in the control measures for warning and informing the public against the risks identified in the CRR – this will be re-assessed following Step 5.

Step 5

- **Identify the target audiences for each risk in the CRR. Where are they located?**
- **Identify vulnerable groups. Has the gap analysis changed as a result?**

At this stage the task group should have completed the following:

- **Consideration and agreement of emergency management risk context;**
- **Selection of Lead Responders against all risks identified in the CRR; and**
- **A gap analysis of all existing and proposed warning, informing, and education arrangements in the LRF area.**

So, what's next? The LRF will now need to identify the target audiences against each risk in the CRR. Who are they? Where are they? Will the chosen method of communication change depending on the time of day or night? What safety action do they need to take for each risk, according to the risk characteristics and timescales outlined in Step 2?

What about vulnerable groups and people in the LRF area? Are there any residential care homes or schools? Are there any members of the community with hearing or sight impairments? How will the LRF engage vulnerable people? These groups, and their warning and informing requirements, need to be addressed not only from a site specific perspective, but generically as well.

The LRF now need to re-assess the gap analysis by adding the target audiences into the equation. How effective are the existing systems in the light of this re-assessment? Where are the gaps now against each risk in the CRR?

Step 6

Consult the public in the LRF area, discuss the partnership's work with neighbouring LRFs and seek out examples of good practice.

The task group will now be approaching the stage where it will need to consider making recommendations to the LRF in order to fill the gaps in the warning, informing, and education arrangements to meet with both elements of the communicating with the public duty established in the Civil Contingencies Act (2004).

However, before continuing, there are a few more actions that the LRF need to take:

a) Consult the public in the LRF area

What do the communities want to see put in place? What problems have they faced in previous incidents? For example, could they hear the off-site sirens? Do they understand the meaning of various siren tones? How would they like to be kept informed? Consultation could be carried out through door-to-door or postal surveys, websites, and consultation with elected members, public meetings, or setting up a stall in the local supermarket or shopping centre.

b) Talk to the neighbouring LRFs and other practitioners

What arrangements do neighbouring LRFs have in place? Talk to each other, and come to an understanding about the best way forward for the whole community. There are obvious advantages to partnership working. Joined-up arrangements across administrative boundaries can enhance the resilience of control measures and can help to improve the effectiveness of what would otherwise be 'stand-alone' arrangements.

c) Seek out and take advantage of examples of good practice

There are 42 LRFs in England and Wales, the key members of which are required to carry out this duty. As a result, there is already a range of good working practice in this area. Seek it out and let neighbouring LRFs know about the ideas that the task group has developed. Be prepared to be influenced also. As is often said in emergency planning circles, 'don't re-invent the wheel' – if one sees a good idea working in another area, adopt it for the LRF, and pass it on.

Step 7

a) LRF to decide what is sufficient – set the standard.

The Task Group is now at the stage where it needs to develop and agree recommendations to present to the LRF, on the basis of the work above. When doing so, consider the following factors:

- Ensure that the LRF have consulted with all stakeholders, including other LRF task groups - be inclusive.
- Put 'address resilience issues' in the task group's recommendations: what resilience does the package of proposals have? For example, are the task group recommending any back-up systems should loss of power be experienced? Could the package be affected by staff shortages?
- Is the recommended package multi-layered? It is very unlikely that one system will be sufficient to provide coverage for all 'at-risk' communities. Consider how the LRF would communicate with the public (i) at different times of the day (or night) and (ii) who are living and working in different locations. Take this into account when designing the solutions package. Remember to design adaptability into the package, so that it can be enhanced in the future, be that as a result of changes to Public

Information Zones around COMAH sites, or changes to a particular risk's characteristics.

- What are the risks that need the most urgent attention from a 'communicating with the public' duty perspective? This may influence the task group's recommendations.
- Give the LRF a number of options to consider, including the task group's favoured package. Additionally, avoid recommending only a 'deluxe' option – be expansive, and provide a variety of solutions, with supporting business cases where necessary. All options should have community safety and resilience at the forefront.

Present the task group's recommendations to the LRF. The LRF will now need to decide which of the recommendations it is prepared to endorse, in line with the duties members have as Category 1 responders under the Civil Contingencies Act (2004). This will probably require resourcing (both financial and human), initiation of projects, and time.

The LRF will need to decide what level of control measures it is willing to implement against the risks presented in the CRR. Throughout its deliberations, the LRF should focus on the legislative duties, and a duty to keep their communities safe.

b) Implement LRF agreed control measures

Devise and initiate a work programme to implement those recommendations approved by LRF.

Step 8

Implement a comprehensive training and exercising regime, to test the LRF's warning and informing arrangements.

When discussing this element as a task group, members need to ask the following questions?

- How will the LRF ensure the warning and informing arrangements within multi-agency plans are effective?
- How will the LRF test systems to ensure that they deliver what they are designed to deliver while at the same time avoiding alarming the public unnecessarily?
- How will the LRF train and maintain the required skills of key staff?
- What training needs exist?

Step 9

Ensure that all stakeholder communities are informed on a continuous basis through the design and implementation of a regularly updated education and awareness raising campaign.

Recommendations for an enhanced public education programme need to be presented to the LRF in conjunction with the proposed package of warning and informing solutions. These recommendations should address not only the issues of required safety actions and details of how the public will be warned and informed, but should also inform them of the risks they face, and how they can help to mitigate, prepare for, and respond to those risks.

Recommendations should also provide a focus for annual, site, and subject specific risk awareness raising programmes.

Note: The above awareness raising programmes should be started as early in the Ten Step Cycle as possible – task groups do not need to wait until reaching Step (9) to implement these types of initiatives.

Step 10

Measure the effectiveness of the implemented control measures, review, and adjust as appropriate.

As with any emergency planning process, it is important that all arrangements are reviewed on an annual basis, (or in line with agreed CRR priorities), to assess and monitor their effectiveness. These reviews should include not only internal LRF assessments and technical analysis, but also community perspectives; are the arrangements working for them? Could they be improved? All results should help improve the arrangements for the future, and in doing so help keep the LRF's communities safe and minimise the impact of emergencies.