

NEIGHBOURHOODS, INCLUSION & EQUALITIES COMMITTEE	Agenda Item 20 Brighton & Hove City Council
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Subject:	Emergency Planning and Resilience - Preventing and Responding to Emergencies		
Date of Meeting:	9th October 2017		
Report of:	Executive Director (Neighbourhoods, Communities and Housing)		
Contact Officer:	Name:	Annie Sparks	Tel: 29-2436
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Ward(s) affected:	All		

FOR GENERAL RELEASE

1. PURPOSE OF REPORT AND POLICY CONTEXT

- 1.1 The Civil Contingencies Act 2004, supporting regulations, and statutory guidance, all establish a clear set of roles and responsibilities for those involved in emergency preparation and response at a local level. This includes clearly defined duties and responsibilities for local authorities
- 1.2 The purpose of the report is to provide Members with an overview of the role and responsibilities of the local authority in relation to emergency planning and resilience and to report how the Council responds to incidents across the City and how it manages risk and maintains resilience.
- 1.3 Emergency planning should aim where possible to prevent emergencies occurring, and when they do occur, good planning should reduce, control or mitigate the effects of the emergency. Emergency planning is an evolving, systematic and ongoing process responding to changes in circumstances, but also from 'lessons learnt' good practice becomes established.
- 1.4 The legislation requires local authorities to have plans in place to not only prevent emergencies but plans to reduce, control or mitigate the effects of an emergency.

2 RECOMMENDATIONS:

- 2.1 That committee notes the review of the council's emergency planning services as set out in the report and the Internal Audit finding of 'Substantial Assurance' in June 2017 in relation to the Council's emergency planning and business continuity controls ;

- 2.2 The committee instructs the Chief Executive to write to the Secretary of State for Communities and Local Government:
- i) asking the Secretary to provide information on the timescale for a review of part B of the Building Regulations (2010) that relate to Fire Safety;
 - ii) to request that, in the event that the outcome of the Grenfell Tower inquiry recommends new actions or measures, that the Government will endeavour to work with local Councils in order that any necessary additional funding can be identified;
 - iii) and, in light of the complaints of the Grenfell Tower tenants that their safety concerns were not appropriately acknowledged, to call on the Government to review the guidance and regulation of housing providers concerning tenant participation and scrutiny,
- 2.3 The committee recommend a cross party working group is convened to oversee the changes and readiness of the council for emergencies;
- 2.4 That committee instructs officers to bring an annual report to the NICE committee updating on changes and readiness of the council for emergencies;
- 2.5 That committee instructs officers to bring a further report in 6 months with an update on arrangements being developed with communities and the community and voluntary sector as set out in section 5 of the report;
- 2.6 That Committee notes the proposal to run workshop sessions for elected members to understand how we can best support their role in an emergency.

3 CONTEXT/ BACKGROUND INFORMATION

Statutory duties and responsibilities

- 3.1 The Civil Contingencies Act 2004 ('the Act') specifically defines an 'emergency' as an event or situation that threatens serious damage to human welfare in a place in the UK, or the environment of a place in the UK, or war or terrorism which threatens serious damage to the security of the UK.
- 3.2 The Civil Contingencies Act 2004, regulations and guidance all deliver a single framework for civil protection in the UK. The Act is separated into 2 substantive parts: local arrangements for civil protection (Part 1); and emergency powers (Part 2).
- 3.3 The Act divides local responders into 2 categories, imposing a different set of duties on each. Those in Category 1 are organisations at the core of the response to most emergencies (the emergency services, local authorities, NHS bodies).
- 3.4 As Category 1 responders the local authority are subject to the full set of civil protection duties as listed below:-
- i. assess the risk of emergencies occurring and use this to inform contingency planning
 - ii. put in place emergency plans
 - iii. put in place business continuity management arrangements

- iv. put in place arrangements to make information available to the public about civil protection matters and maintain arrangements to warn, inform and advise the public in the event of an emergency
 - v. share information with other local responders to enhance co-ordination
 - vi. co-operate with other local responders to enhance co-ordination and efficiency
 - vii. provide advice and assistance to businesses and voluntary organisations about business continuity management (local authorities only)
- 3.5 Category 2 organisations (the Health and Safety Executive, transport and utility companies) are 'co-operating bodies'. They are less likely to be involved in the heart of emergency planning work, but will be heavily involved in incidents that affect their own sector. Category 2 responders have a lesser set of duties - co-operating and sharing relevant information with other Category 1 and 2 responders.
- 3.6 Category 1 and 2 organisations come together to form 'local resilience forums' (based on police areas) which will help co-ordination and co-operation between responders at the local level. Brighton and Hove City Council, along with other Sussex authorities, external partners, Department of Communities and Local Government Resilience and Emergencies Division, and voluntary sector organisations are all members of the Sussex Resilience Forum and this meets regularly to deliver services at a local level but also respond to national emergencies and issues, and thereby ensure compliance with all mandatory elements of the Civil Contingencies Act 2004. This includes a programme of multi agency training and exercising, including the testing of emergency plans. The forum has a Delivery Group which is tasked to help deliver the forum's business plan, including the development and approval of emergency plans, and also monitor action plans from debriefs of specific incidents. **Appendix 1** details the structure and terms of reference for the Sussex Resilience Forum.
- 3.7 Across Sussex there is a Memorandum of Understanding (MOU) to provide a framework by which local authorities in Sussex may call upon each other for support during an emergency. It follows the guidance issued by Cabinet Office in December 2008 in the document entitled "Mutual Aid - Short Guide for Local Authorities". This MOU has just been reviewed by all parties and is an agreement between Category 1 and 2 responders and other organisations to provide assistance with additional resource during an emergency, which may overwhelm the resources of an individual organisation.
- 3.8 The Act requires local authorities and other Category 1 responders to maintain plans for preventing emergencies; reducing, controlling or mitigating the effects of emergencies; and taking other action in the event of emergencies. These should have regard for the arrangements to warn, inform and advise the public at the time of an emergency, and also extends to the provision and management of rest centres that will be required during such an emergency when our communities and the public are displaced.
- 3.9 The legislation requires plans to contain a procedure for determining whether an emergency has occurred; provision for training key staff; and provision for

exercising the plan to ensure it is effective. Procedures should also be put in place to ensure that the plan is reviewed periodically and kept up to date.

- 3.10 The main focus for emergency planning is to consider how to minimise the effects of an emergency, starting with the impact of the event (ie their alerting procedures) and looking at remedial actions that can be taken to reduce effects. Recovery plans should also be developed to reduce the effects of the emergency and ensure long term recovery.
- 3.11 An incident command model of Gold (Strategic) Silver (Tactical) and Bronze (Operational) is used by category 1 and 2 responders for the command and control of emergencies, incidents and planned operations. This provides a framework for delivering a strategic, tactical and operational response. The Council's Executive Leadership Team (ELT) operate a 24 hour standby GOLD rota and are prepared and ready to respond and be part of a Strategic multi agency GOLD team relating any incident emergency or planned event. In the Council we have staff who are trained and prepared to respond to an incident and be SILVER and BRONZE responders. The latest GOLD SILVER and BRONZE framework we had in place was during Pride 2017. The Executive Director Neighbourhoods, Communities and Housing was GOLD command, colleagues from Events, Regulatory Service and Highways were based in Lewes Police Headquarters as a SILVER response and colleagues across a range of services were in the City responding as BRONZE.
- 3.12 Members of ELT regularly take part in Emergency planning exercises, where a test scenario is played out and their responses are tested. The last exercise was held in March 2017 when the Executive Leadership Team was part of a day long GOLD test exercise working with colleagues across Sussex on a scenario that not only tested their role, response and preparedness but also the emergency plans that we have in place.

Preparedness and Modernisation

- 3.13 The Emergency Planning and Resilience Service is a part of Regulatory Services in the Neighbourhoods, Communities and Housing Directorate. It is a cross cutting service that works with the majority of council services, but also works with our partners, communities and third sector organisations. Throughout the year the service operates a 24 hour standby service preventing and responding to incidents. The staff undertake regular training and exercises to maintain their skills including specific emergency planning training, and management and testing of business continuity is part of the team's work.
- 3.14 On the 6th July 2016 the Council's Executive Leadership Team authorised a corporate modernisation programme for the emergency and resilience service. This corporate redesign and change process identified the need to introduce better risk management and more effective and efficient ways of working.
- 3.15 The majority of the modernisation work has now been completed and has included:
- how we review the recording and management of incidents,
 - how incident debriefs are managed,
 - how associated findings are implemented

- a review of the provision and management of Rest Centres
 - a review of how our emergency and business continuity plans are assessed and tested.
- 3.16 The status and frequency that emergency plans are tested is now reported to the Executive Leadership Board quarterly with the Council's risk register, and thereby ensures that risk and resilience in relation to plan management and testing is routinely scrutinised.
- 3.17 In June 2017 an internal audit of emergency planning and business continuity was carried out and identified 'Substantial Assurance' over the controls operating within the area.
- 3.18 The provisions and management of rest centres has been part of the modernisation process. The Council has always had a pool of council staff volunteers who can be called upon in an emergency and this includes a pool of rest centres that can be accessed across the City. This currently includes a standby rota of Adult Social Care managers who are able to open and manage a rest centre should it be required.
- 3.19 To improve resilience the modernisation programme has introduced a new contracted rest centre manager role that will be part of a structured year round rota made up of 8 trained rest centre managers. This is in addition to a new 'emergency responder role'. These posts will be held by trained council staff and be a contracted role in addition to their substantive posts. These posts are currently being recruited to and should be in place by December 2017
- 3.20 In addition to the 24 hour standby service provided by the Emergency Planning and Resilience Team our Housing service also operate an out of hours rota of experienced officers who are also on standby 24 hours a day and who can advise and assist people in these circumstances. The access to this for services is via Carelink or Mears (for council tenants/properties) which operate 24 hours call centres. Officers assess the person's needs and circumstances and discuss their options for alternative housing. If the person affected is a homeowner or private sector tenant we would advise them to contact their (or their landlord's) buildings or contents insurers who normally make provision for alternative accommodation in such circumstances. If they are not covered by insurance or if they are a council tenant then the officer would talk through whether they could stay with friends or family and if there is no other option the Council would provide them with emergency accommodation. The council has a statutory duty to provide emergency accommodation to anyone who would otherwise be homeless as a result of an emergency such as a fire or flood. The cost of this would be recouped from insurance if at all possible.

Council Housing

- 3.21 For council housing, the Council as landlord has additional duties to residents. The Emergency Planning and Resilience duty out of hours officer will be the first point of contact for any emergency and in turn will contact colleagues in Housing where a response and support is needed. Out of hours Housing Staff are contracted to access any of our sites within an hour of a call and Mears contractors and AP

security are also available to attend any significant incidents on our behalf to deal with any structural, security and maintenance issues that happen as a result of an incident.

- 3.22 The duty out of hours Housing Staff would lead on defining what support and resource is needed to support residents and manage the impact of the incident. Staff have access to a large number of community rooms as do Tenant and Resident Associations and we often find that residents open up these rooms themselves for neighbours who might be displaced as a result of an emergency in advance of a formal rest centre or where an incident is not so significant that a rest centre would be required. It is often a joint effort between council officers, contractors, residents, and voluntary sector agencies to support people who are displaced as a result of an incident.
- 3.23 During major incidents housing staff will attend a rest centre and provide advice and assistance on site. Housing staff and housing contractors are also sometimes called in to mitigate against the need for a large decant. For example in one case the water supply and lifts failed in a council tower block for a few days. Housing staff and contractors made regular deliveries of drinking water to people in the block for several days to avoid the need to decant most people from the block.
- 3.24 The same situation also occurred in a privately owned tower block and housing staff also assisted but the cost of staff was reclaimed from the building owner's insurance. Other examples have included providing security guards to patrol where the door entry of a seniors housing scheme fails or providing food and other essential items to people with mobility problems in tower blocks where the lifts are out of action for a period of time.
- 3.25 There are a number of significant incidents every year that housing become involved in. Some examples of the larger scale complex incidents are as follows:
- 3.26 In July 2009 there was a major fire at YMCA Old Steine which was then a supported housing service for 60 men with complex needs. All 60 became homeless. The fire occurred late afternoon and by the time the council were alerted most staff had left work for the day. Staff remaining in the office stayed on and worked through to the early hours to ensure all of the residents had their needs met and were rehoused. The council set up a rest centre and transported the homeless residents to the location.
- 3.27 No one was injured as a result of the fire but some were very distressed and had serious mental health issues. Many of the residents were on medication so we arranged for a GP and nursing staff to attend and provide prescriptions as required. The 24 hour pharmacy was alerted and staff were transported by the Red Cross to collect prescriptions. The Red Cross also provided packs with emergency items such as toiletries and a change of clothing. Because of the complex nature of the residents, rest centre staff, social workers, housing staff and YMCA staff who were key workers worked together at the rest centre.
- 3.28 The police and ambulance service also attended to provide additional support as needed. It was a very challenging evening as we were required to find 30 units of temporary accommodation and in some cases those displaced had very complex

- needs. However we did manage to accommodate every person and every person left with the medication and essential items required to meet their basic needs. No one had to spend the night at the rest centre.
- 3.29 Following the night of the incident colleagues from housing were the points of contact for each resident while alternative longer term accommodation was found and also ensure they were linked in to appropriate support services.
- 3.30 There was learning from this incident that more staff were needed on the ground who were experienced in working with this client group due to the complexity of their needs. This has been addressed through an arrangement with Brighton Housing Trust and the Street Services Team who are now on call to assist with the staffing of a rest centre required for this client group in the future, and operate it from First Base.
- 3.31 In December 2009 there was a gas leak which affected some council properties in Ingram Crescent. 60 Households had to be decanted. A rest centre was set up in a nearby community room which was staff by rest centre staff and housing staff. No one had to stay the night at a rest centre and the majority of people who could not stay with friends or family were accommodated in a large town centre hotel.
- 3.32 The following day most people could return home but the 21 households who could not and needed emergency accommodation were all relocated to the hotel. Housing staff set up a base in one of the conference rooms of the hotel where residents could come and see housing colleagues during the day 7 days a week until they were able to return home. Housing staff provided them with allowances for meals.
- 3.33 Housing had a regular morning meeting with the displaced residents where they updated them and also met with them individually to check that they had essential items and whether or not there were any emerging needs as a result of the time away from home which we sought to address (e.g running out of medication, clean clothes).
- 3.34 Housing colleagues also gave the affected residents information about how they could make insurance claims for any losses as a result of the situation. The council also pursued for full cost recovery from South Gas Network Insurance.
- 3.35 Housing Staff work closely with Emergency Planning and Resilience Team and other services to ensure their staff are up to date and able to respond to incidents. Learning from any incidents that occur and reviewing and updating our procedures is a key part of this work. Housing staff recently held an Emergency Planning Exercise day with other teams and agencies where a scenario of a major incident was tested. This was to develop and test staff ability to deal with an incident and to ensure that they are fully aware of the options and resources available to them.
- 3.36 **Provision of rest centres**
- 3.37 The provision of rest centres across the City is constantly under review and this includes council owned premises, including sheltered accommodation and libraries, community buildings, and hotels. Hove Town Hall was an identified rest

centre and during the refurbishment it's use was suspended but it is now back in use. All rest centres have been assessed and are part of register which includes details of capacity, facilities, contact and access details. Across the City we currently have 34 rest centres with capacity ranging from 40 to 3000. In addition we have a number of hotels who have also offered facilities should we need them.

3.38 Proposals for support of Elected Members

3.39 The role of elected members in supporting their constituents during an emergency is recognised as an important element of the Council's response to a major incident. In order to understand how officers can best support elected members in their role in an emergency, workshop sessions have been planned to take place for insert date and the feedback from these sessions will then be incorporated into the Council's emergency and resilience plans.

4. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

4.1 None.

5. COMMUNITY ENGAGEMENT & CONSULTATION

5.1 When preparing and planning for emergencies the legislation and guidance specifically references the potential role of voluntary organisations which could assist in responding to an emergency.

5.2 Our communities and the voluntary sector are able to provide a wide range of skills and services in responding to an emergency. These include: practical support (such as first aid, transportation, or provisions for responders); psycho-social support (such as counselling and helplines); equipment (radios, medical equipment); and information services (such as public training and communications).

5.3 Recent events in Manchester and London demonstrated the value of our communities when responding to an incident. However, it is not just the immediate response to an incident. Recovery may take months or even years to complete, as it seeks to support affected communities in the reconstruction of the physical infrastructure and restoration of emotional, social and physical well-being. The process of rebuilding, restoring and rehabilitating the community following an emergency or disaster, continues until the disruption has been rectified, demands on services have been returned to normal levels, and the needs of those affected have been met. This is not just down to local authorities and other category 1 responders. Again recent events in Manchester and London demonstrated the value, resource, expertise and local knowledge and intelligence that our communities have.

5.4 The Council's Executive Director for Communities, Neighbourhoods and Housing recently met with community representatives from across the City to explore the role that our communities play preventing, and responding to emergencies and incidents. This is the first of a programme of meetings that will be integrated into the emergency planning work that is delivered by the council and it's partners, and will ensure that delivery of emergency planning portfolios does not just focus on

the role of category 1 and 2 responders but ensures that communities are also part of this work and define their role when preventing and responding to emergencies and incidents. Working with Community Works the council is seeking a bottom up approach that enables communities to do what they do best in emergencies and makes best use of the resources and energy of our city's communities. Comment from Community Works :-

"Community Works is pleased to be part of the Emergency Planning and Resilience work. The need for support to be provided to communities experiencing emergency situations and crises requires knowledge of the community and their needs. The Community and Voluntary Sector has close links with the communities it serves and can respond to various needs within those communities in the immediate aftermath of an event and help the community to increase their resilience when rebuilding after an event. The sector will support all responders in working with communities to identify what support is needed and work with communities to ensure support is received where it is needed."

6. CONCLUSION

- 6.1 How local authorities prevent and respond to emergencies and incidents is clearly defined in legislation and statutory guidance. Emergency planning is an evolving, systematic and ongoing process responding to changes in circumstances, but also from 'lessons learnt' good practice becomes established.
- 6.2 The modernisation of the Emergency Planning and Resilience Service has ensured that measures and procedures are in place to manage risk and ensure resilience. This includes the provision and testing of emergency and business continuity plans, and the provision and management of rest centres.
- 6.3 The recent internal audit of business continuity and emergency planning identified 'substantial assurance'.
- 6.4 Recent events in Manchester and London have demonstrated the support, resource and value that our communities and Voluntary Sector organisations can play responding to an incident and also during the recovery phase. The potential benefits are significant and the engagement of our communities and the Community and Voluntary Sector is vital to achieve effective response to an emergency, and ensure an effective recovery. How we work and collaborate with our communities to prevent and respond to emergencies is embedded in the aims and objectives of the council's Neighbourhoods and Communities Portfolio. This portfolio is focused on the successful and genuine collaboration of residents and partners and is designed to be flexible and responsive to residents' needs and changing circumstances. All this is needed when preventing and responding to emergencies and incidents.

7. FINANCIAL & OTHER IMPLICATIONS:

7.1 Financial Implications:

There are no direct financial implications arising from this report. The 2017/18 net budget for the Emergency Planning and Resilience Service in the Neighbourhoods Communities and Housing Directorate is £0.122m. In an emergency, staff and other resources across the council are deployed as and when needed and these costs are met from within current budget resources, After an emergency, insurance claims or government grant claims are made to reimburse the council where possible.

Finance Officer Consulted: Monica Brooks Date 31/08/17

7.2 Legal Implications:

The legal obligations of the Council in relation to Emergency Planning are set out in the body of the report. There are no further legal implications to note.

Lawyers Consulted: Elizabeth Culbert Date 4th September 2017

7.3 Equalities Implications:

This work supports the recommendations of the Fairness Commission through its recognition of the pivotal role of the Community & Voluntary Sector and the excellent contribution of ordinary people in the city. The work with our communities focuses on co-production and collaboration.

Improving the accessibility of council owned buildings will help address equalities issues for residents and staff with disabilities. Working more closely with community groups will help ensure that the diversity of local neighbourhoods is more fairly represented.

7.4 Sustainability Implications:

7.5 Any Other Significant Implications:

SUPPORTING DOCUMENTATION

Appendix 1 Sussex Resilience Forum : Terms of Reference and Structure Introduction to the Sussex Resilience Forum

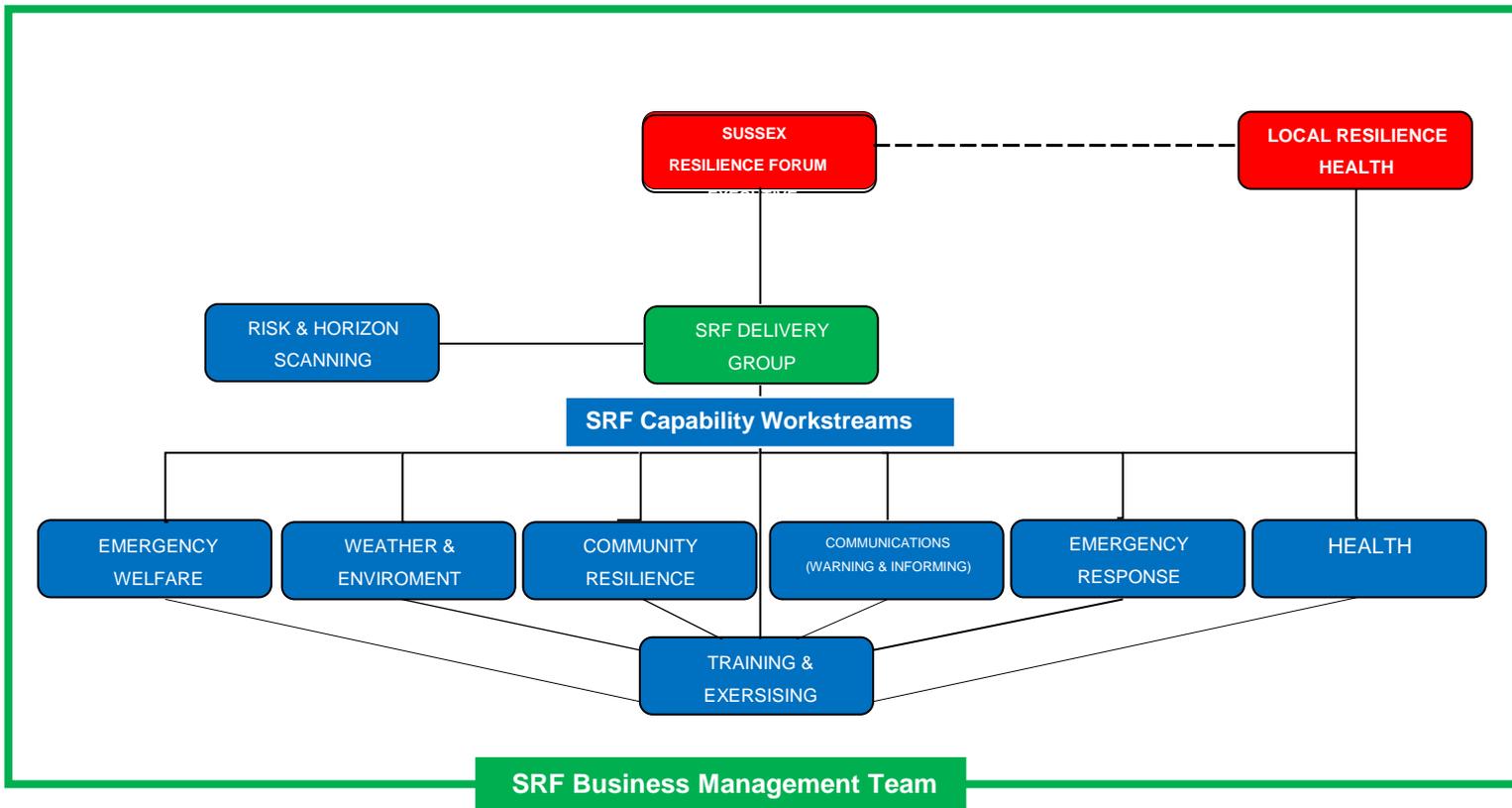
The Sussex Resilience Forum is a non-statutory forum and consists of members from the Emergency Services, National Health Service / Public Health England, Local Authorities, Environment Agency and Military and other government representatives, with comprehensive support from the Voluntary Sector coming together with the principle aim of 'Making Sussex a Safer Place'

The role of the SRF is to establish through a collective forum, responsibility and a collaborative approach to, plan, prepare, and communicate in a multi-agency environment in line with the Civil Contingencies Act 2004 and associated regulations to address all aspects of policy in relation to:

- risk;
- planning for emergencies;
- planning for business continuity management;
- publishing information about risk assessments and plans;
- arrangements to warn and inform the public; and
- other aspects of civil protection duty, including the promotion of business continuity management by local authorities; and
- support the preparation of multi-agency plans and other documents, including protocols and agreements and the co-ordination of multi-agency exercises and other training events, so that we actively learn and drive continuous improvement

A key objective of the forum is to ensure compliance with all 'mandatory' elements of the Act as noted, whilst still aspiring to achieve the rest, and the forum adopts an integrated risk approach to ensure appropriate prioritisation of work, details of which are available in its business plan which is updated on an annual basis, and available from Resilience Direct.

Structure & Terms of Reference



Capability Work stream will be tasked through an annual joint work plan with areas of responsibility as set out below;

Emergency Welfare	Evacuation & Shelter, Identifying Vulnerable People, Emergency Assistance, Gridlock, Fuel, Recovery (incl. Pollution / Emergency Waste Management (site clearance)
Weather & Environment	Adverse Weather Framework, Multi-agency Flood Plans, Animal Diseases, Reservoirs.
Community Resilience Partnership	Community Resilience (Incl. Business Continuity Promotion) & Voluntary Sector
Communications (Warning & Informing)	Warning & Informing, Social Networks, Website.
Emergency Response	SERR including TAG's, TCC's SCC and SCG. JESIP, Hazmat/CBRNE, Mass Fatalities, Maritime, Military Aid, Category 2, Telecoms Sub Group
Health	Pandemic (emerging diseases), Mass Casualties, STAC, LHRP Planning
Training & Exercising	Planning and delivering the SRF training prospectus, identifying training requirements, exercise planning.

SRF Executive - Terms of Reference

The Sussex Resilience Forum Executive provides the mechanism for an executive overview of compliance with the requirements of the Civil Contingencies Act and Regulations by Category 1 and 2 responders with a focus on making Sussex a safer place, ensuring that the arrangements are in place, including resources and funding, to deliver the annual work plan and to address under performance

The SRF Executive is chaired by a Senior Sussex Police Officer and allows for like organisation representation, and membership, consisting of both individual Category 1 organisations and representatives nominated from their peer group

The Chair will be reviewed on an annual basis.

The current agreed membership is as follows:

Chair, plus:

- Local Authorities -5 members (East Sussex County Council, West Sussex County Council, Brighton and Hove City Council, Districts and Boroughs West , Districts and Boroughs East)
- Response Services-6 members (East Sussex Fire & Rescue Service, West Sussex Fire & Rescue Service, South East Coast Ambulance Service, Sussex Police, Marine and Coastguard Agency, and Environment Agency)
- Health-3 members (PHE, LHRP x 2)

Total: 15 members

Other colleagues are represented: Voluntary Sector, Joint Regional Liaison Officer, and Department of Communities and Local Government Resilience and Emergencies Division.

The SRF Executive will be responsible for setting the strategic direction for the SRF and capabilities planning and agree the high level work plans considering current risk and threat information and future challenges.

The SRF Executive will have two meetings per year represented by the Executive membership but may call a special meeting outside of this by exception where it is felt necessary by the Delivery Group or by any member of the executive

The SRF Executive will monitor the performance of the SRF Delivery Group and related work streams including the delivery of the annual business plan and the financial and business arrangements of the SRF.

Additionally, each member of the Executive has an individual responsibility to co-ordinate the contribution of their organisation to the delivery of the objectives of the SRF and their own organisation's compliance with the CCA, related Regulations and guidance as issued by Central Government. Where an Executive member is representing a collective group, they should ensure that they liaise with other executive leads of the respective organisations to ensure the same functions as if they were a member.

Additionally the SRF Executive will:

- Champion the promotion of the SRF role and links to wider strategic initiatives (e.g. crime & disorder partnership)
- Ensure representation at the LRF National Chairs Conferences
- Monitor membership to the executive role and that members or their nominated deputy has the ability and authority to make decisions in respect of their organisation's resources and assets without the need to refer back and also have the authority to seek the aid of others in support of their role.

Maintain an oversight role in respects to the development and sign off.