Comparative Emergency Response:
An Institutional Analysis of the United States and United Kingdom

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Introduction

Over the past decade, the structure and focus of emergency planning and response in the United States has drastically changed. The shock of the September 11th terrorist attacks caused a complete reassessment of American emergency management, including a vast restructuring effort in the creation of the Department of Homeland Security. The focus of emergency planning and response shifted toward the terrorist threat, which many deemed a "knee-jerk" reaction that ignored the importance of "all-hazards emergency management."[1] These fears were realized when Hurricane Katrina quickly revealed the severe institutional weaknesses in American emergency response that were either not solved or exacerbated by the post-2001 restructuring. Reacting to the failures of Hurricane Katrina, the federal government has "taken its typical response to a new problem…[it] committed huge amounts of funding to reducing the problem."[2] The organizational weaknesses of American emergency response pose a serious danger to American national security, demanding significant attention and innovative solutions.

The United States is not alone in facing these challenges. The United Kingdom has also attempted to adapt their response structure to reflect emerging terrorist threats and lessons learned from natural disasters. The current literature on emergency management does not examine how different countries approach response from an institutional level. In both the United States and United Kingdom most of the academic focus has been on the nature and the character of the threat and how the State should react to minimize this danger. Emergency response is the product of years of experience and adjustment based upon each country's political, environmental, and social situation. The United States and United Kingdom have created different institutions and management systems to respond to emergencies. Emergency

[1] Haddow, George D., Jane A. Bullock, Damon P. Coppola, *Introduction to Emergency Management*, 3rd Ed. New York: Butterworth-Heinemann, 2008. pp. 376.
[2] Ibid. pp. 377.

managers need to seek out and learn from the experiences of others rather than waiting for disasters to hit before reform is initiated. This paper will uncover comparative lessons in emergency response by analyzing how American and British institutions react to natural and manmade disasters. Unlike many other scholarly works on this topic, this paper will take a system wide approach, analyzing the flow of decisions between institutions and tiers of emergency response. There is no predictability when it comes to disasters. Emergency response is an imperative for all countries and needs to continually adapt based upon a collective set of experiences.

Literature Review

Both the US and UK have been hampered by an inability to look beyond their own ingrained reform processes toward fresh perspectives that may lie outside their national borders. Contemporary analysis of American Homeland Security vulnerabilities has sought to mitigate the devastation of natural disasters and terrorism. In doing so, scholars and government officials have relied predominantly upon lessons learned from past domestic crises, rather than actively drawing upon the experiences of others. There are very few comparative studies concerning the institutional and decision-making structures of different emergency response systems. What literature does exist can be divided into four categories: government strategic documents, single system critiques, single disaster critiques, and limited comparative analyses.

Official government documents provide the most abundant resource concerning British and American emergency response structures. Both countries have made most of their planning documents accessible to the public, providing in-depth emergency response structures at the national, regional, and local levels. One such document is the London Emergency Services Liaison Panel's *Major Incident Procedure Manual* of July 2004. This plan, produced in

conjunction with British emergency responders, "provides summaries of the responses and responsibilities of each of the emergency services at a major incident, as well as an outline of the support role offered by local authorities."[3] It also details the Gold, Silver, and Bronze commands, the crisis management structure employed in the United Kingdom for coordinated response. Similar documents can be found in the United States, such as the *National Incident Management System (NIMS)*, which is published by the Federal Emergency Management Agency (FEMA). NIMS is a management doctrine designed to provide a "comprehensive, nationwide, systematic approach to incident management, including the Incident Command System," the equivalent of the Gold, Silver, and Bronze commands in Britain.[4]

These government documents are primary source material intended to instruct agencies about their role and responsibility in emergency response in the United States and United Kingdom. They lay out the exact hierarchy of command and control when an incident occurs and details the methods of escalation, should resources at a particular level be overwhelmed. These documents do not, however, examine best practices of other countries or how these arrangements function out in the field. In effect, they are field manuals outlining responsibilities for relevant responders. Reform has taken place within the context of these government plans; they have been updated, revised, or even created in reaction to new challenges of terrorism and large-scale natural disasters, but they have not actively contrasted emergency response institutional frameworks across countries.

Unlike government documents, single system critiques examine the actual operation of the British or American emergency management structure in an effort to assess strengths and

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[3] "Major Incident Procedure Manual," *London Emergency Services Liaison Panel*, 6th ed. July 2004, pp. 8.
[4] "National Incident Management System," *Federal Emergency Management Agency*, FEMA 501/Draft, August 2007, pp. 6.

weaknesses. For example, "DHS 2.0: Rethinking the Department of Homeland Security, " a study conducted for the Center for Strategic and International Studies, critiqued DHS's ability to meet benchmarks of effective management, missions, authorities, and resources. The study found that DHS is "weighed down with bureaucratic layers, is rife with turf warfare, and lacks a structure for strategic thinking and policymaking."[5] The authors assessed the fundamental federal department responsible for emergency management, ultimately recommending reorganizing DHS into a flatter bureaucratic structure for more effective resource management, planning, strategic thinking, and emergency response. Geoff O'Brien takes a similar analytical approach in his article, "UK Emergency Preparedness: A Step in the Right Direction?" O'Brien details how, after the September 11th terrorist attacks in the United States, the British have restructured to establish a national legal framework for emergency management, create a regional level tier of response, and increased the focus on suicide terrorism.[6] The focus of this type of literature is to assess the effectiveness of a isolated system, not to compare institutions or decision-making structures.

Another common form of emergency related literature focuses on response and recovery from a single disaster. Recently, the American response to Hurricane Katrina has received extensive attention, particularly the regarding institutional failures. A case study conducted by George D. Haddow, Jane A. Bullock, and Damon P. Coppola examined testimony from first responders, federal employees, and academics in the aftermath of Hurricane Katrina as an independent critique of the American emergency management system. These scholars concluded that "the response to Hurricane Katrina was a failure on all levels," requiring a comprehensive

[5] Heyman, David and James Jay Carafano, "DHS 2.0: Rethinking the Department of Homeland Security," *Center for Strategic and International Studies*, December 2004, pp. 7.
[6] Geoff O'Brien, "UK Emergency Preparedness: A Step in the Right Direction?" *Journal of International Affairs*, Vol. 59 (2), Spring 2006, pp. 70-71.

national system that promotes coordination between federal, state, and local responders.[7] Critical assessments of major incidents offer crucial insights into emergency response beyond regulatory obligations and training. Major incident analysis, as in the case of this Hurricane Katrina case study, seeks to highlight where the current system has failed and how it should be improved. Since these major incidents are the basis from which emergency response reform flows, they offer an important benchmark for analysis.

There have been very limited attempts at comparative analysis in the emergency response field. For example, the British Cabinet Office Civil Contingencies Secretariat produced a report broadly placing Hurricanes Katrina and Rita into context for British emergency managers. The report took a very general, lessons learned approach to these disasters, recommending that emergency planners in the United Kingdom give more consideration to evacuation planning, taking into account weather related complications.[8] Dan Jones, a professor from the University of Leeds, takes a different approach in his article, "Structures of Bio-Terrorism: Preparedness in the UK and the US," comparing specific aspects of British and American preparedness. Jones draws an important distinction between the "UK emphasis on 'resilience' and the US emphasis on 'security,'" but does not elaborate on an institutional or macro level.[9] Although these comparative works are valuable, they rarely encompass entire emergency response systems.

This paper will take a comparative approach in order to examine the macro-level operations of emergency response institutions and decision-making structures. A comparative case study approach is needed to examine the flow of decision-making between institutions and tiers of emergency response. This paper will not seek to conduct an in-depth view of specific

[7] Haddow, George D., pp. 400.
[8] *Hurricanes Katrina and Rita: A Perspective*, Cabinet Office Civil Contingencies Secretariat, March 2006, pp. 36.
[9] Jones, Dan, "Structures of Bio-terrorism. Preparedness in the UK and the US: Responses to 9/11 and the Anthrax Attacks," *Political Studies Association*, 2005, pp. 344.

emergency response functions, such as search and rescue or business continuity operations. As discussed previously, this type of analysis has been done before and a different approach is needed to promote innovative thinking in emergency response. The United States and United Kingdom were selected as the two systems because they are admittedly closely related. As will be discussed later, both countries have founded their emergency response systems based upon a "bottom-up" approach, which is a useful basis for comparative analysis. Since the purpose of this paper is to uncover practical lessons for emergency response, it is useful to begin with countries for which there is a common basis for comparison. By sharing a similar philosophy, it will be possible to establish practical recommendations for emergency response reform.

Both emergency response structures will be compared based upon their incident command structure and their established institutions. The incident command structure is the overall management system that governs a country's response operations in any emergency. These systems are activated during an emergency and bring together the various emergency response institutions into a forum for collective decision-making. This paper will not analyze all possible institutions involved in emergency response. Specifically, the potential role of the military in emergency response will not be discussed for either the US or US. In addition, although there are some important differences between England and the Devolved Administrations, the UK will be approached as a single system.[10] Analysis of the incident command structures and institutions in the US and UK will provide a new approach to emergency response and will provide the basis for further research.

[10] The Devolved Administrations are the governments of Northern Ireland, Scotland, and Wales. Many of these differences are minor and relate to slight differences in institutions between England and the Devolved Administrations. Despite these differences, the United Kingdom as a whole shares a common emergency response philosophy and incident command structure.

British Emergency Response

Incident Command Structure

The United Kingdom emergency response structure is based on a "bottom-up approach in which operations are managed and decisions are made at the lowest appropriate level."[11] As is the case in the United States, most emergencies are handled entirely at the local level without the need of regional or national guidance. The British command structure is designed to adjust to any emergency; an "all-hazards" approach that brings together all relevant organizations in a flexible manner. According to the Civil Contingencies Act 2004, an emergency is defined as

- An event or situation which threatens serious damage to human welfare in a place in the United Kingdom,
- An event or situation which threatens serious damage to the environment of a place in the United Kingdom, or
- War, or terrorism, which threatens serious damage to the security of the United Kingdom.[12]

In addition to this general definition, the British qualify more specific types of emergencies depending on the incident's severity. A major incident is "any emergency that requires the implementation of special arrangements by one or all of the emergency services and will generally include the involvement, either directly, or indirectly, of large numbers of people."[13] More severe, a catastrophic incident is declared when "the Designated Minster is of the opinion that it is of such magnitude that it will require a specific, or exceptional response from members…[and] in doing so it is recognized that the full Government involvement will be required."[14] These different declarations initiate different response procedures, escalating the level of government involvement more quickly, rather than conferring extra legal authorities or resource allocations.

[11] "Emergency Response and Recovery," *HM Government*, November 2005, pp. 7.
[12] Civil Contingencies Act 2004, *HM Government*, 2004 Chapter 36, 18 November 2004, 1 (1).
[13] "Strategic Emergency Plan," *London Resilience*, Version 2.1, April 2005, pp. 2.
[14] Ibid., pp. 3.

When an emergency occurs, Gold, Silver, and Bronze groups may be established. According to the *London Emergency Services Liaison Panel Manual*, these three groups perform roughly the "strategic," "tactical," and "operational" functions in an emergency.[15] At the onset of an emergency, the Bronze group will be established to manage on-scene response and coordinate the rescue/containment efforts. From there, response coordinating structures may be added as the emergency requires, providing more strategic guidance and resource management as the scope of the incident becomes clearer. As managerial staff from responding agencies and departments arrive at the scene or the off-site coordination location, they will be assigned appropriate roles within the Gold, Silver and Bronze framework.[16]

The Bronze group is responsible for on-scene direction and execution of tactical decisions made by Silver command. *Emergency Response and Recovery*, the non-statutory national guidebook for British emergency response, states that managers at the Bronze level participate in "hand-on" work at a specific incident site, such as undertaking search and rescue operations, establishing cordons, and managing traffic.[17] Each agency maintains control of its own resources, but the Bronze group ensures coordination of these efforts to prevent duplication, miscommunication, and mistakes in response. The Bronze group is lead by a single manager, usually designated before hand as a local police commander. Perhaps the most important function of the Bronze group is for the leader to assess when the incident requires a higher level of coordination due to its complexity, scale, dispersion, or potentially wider-impact. If this judgment is made, the Silver group will be activated, requiring the Bronze group to coordinate with the new group in the execution of its tactical plans.

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[15] "Major Incident Procedure Manual," *London Emergency Services Liaison Panel*, pp. 22.
[16] Ibid.
[17] "Emergency Response and Recovery," *HM Government*, pp. 22.

The Silver group will be established in order to create a "cohesive joint strategy" and establish priorities for different responding agencies.[18] This group is usually comprised of the most senior officers of responding agencies in the area and is located in close proximity to the incident site.[19] The primary objective of Silver will not be to manage on-site activities, but rather to coordinate these efforts and ensure that responders have all resources necessary to accomplish their objectives. In addition, the Silver group will be responsible for ensuring multi-agency coordination in close proximity to the incident-site and tasking priorities. In situations where there the incident requires a higher level of coordination and/or where there are multiple incident sites, the Silver group will call for the activation of the Gold group.

The Gold group, often referred to interchangeably as the Strategic Co-ordinating Group (SCG), is established when an incident:

- Has the potential to overwhelm allocated resources;
- Lasts a significant amount of time; or
- Involves a large number of organizations.[20]

The SCG is comprised of the highest local level incident commanders for each responding agency or group, including the police, fire, and ambulance services and a high-level member of the elected local authority, perhaps the chief executive. As with the other management levels, the Gold group is often chaired by the police, although they do not have the authority to issue executive orders to other agencies or command structures.[21] Meeting away from the incident site, the Gold group's first order of business is to establish the strategic framework for the response that all agencies will operate in. This entails allocating resources to appropriate areas, prioritizing

[18] "Major Incident Procedure Manual," *LESLP*, pp. 26.
[19] These senior officers would be the most senior of "each agency committed within the area of operations." "Emergency Response and Recovery," *HM Government*, pp. 22.
[20] "Emergency Response and Recovery," *HM Government*, pp. 23.
[21] Ibid.

Silver's duties, establishing a media game plan, and considering long-term response strategy.[22] Gold has the responsibility of keeping Silvers informed of unfolding events, particularly when there are multiple incident sites.[23] Since each agency retains control of its own resources, the SCG is reliant upon compromise amongst its members. Thus, each Gold member must be able empowered to make compromises and allocate resources on behalf of his/her entire agency.

If an incident threatens to overwhelm local resources or has significant implications for the United Kingdom, the strategic level of coordination may move to the regional tier or central government. When this occurs, the strategic level of emergency response will "shift upwards from the local level, although the functions of the bronze, silver, and gold teams at the local level will remain broadly the same."[24] If an emergency requires more than local coordination, many other institutions will become involved, but the management framework at the incident site remains the same.

Institutional Progression of Emergency Response

LOCAL

The incident command structure lays out the context within which responders and institutions operate. The institutions that have emergency response responsibilities have many other duties beyond the actual incident.

The foundation of local emergency planning in Britain is the Local Resilience Forum (LRF). This organization is designed to coordinate risk assessment, business continuity management, public notification, and emergency planning within each local police jurisdiction.[25] The Civil Contingencies Act of 2004 makes LRFs statutorily required bodies and defines their membership to include Category 1 and 2 responders. Category 1 responders are required to be

[22] Ibid.
[23] "Report of the 7 July Review Committee," *London Assembly,* June 2006, pp. 43.
[24] "Emergency Response and Recovery," *HM Government*, pp. 21.
[25] "Emergency Preparedness," *HM Government*, pp. 11.

"effectively represented" at all LRF meetings, but each organization is not necessarily required to attend every meeting in person.[26] Category 1 responders consist of local elected authorities, the police, fire and rescue authorities, the ambulance services, primary care trusts, local health boards and representatives from the National Health Service (NHS), the Health Protection Agency (HPA), and the Environment Agency.[27] Category 2 responders bear "narrower obligations" than their Category 1 counterparts and should participate in LRF meetings only "when they can add value."[28] These responders may include representatives from utilities companies, transport companies, and the Health & Safety Executive.[29]

LRFs and its participants play an important role to emergency response because they are required by the Civil Contingencies Act to collectively produce an emergency plan, including a Community Risk Register, and activate it should an incident occur.[30] To reduce the possibility of duplication, a lead responder is selected in each LRF from the pool of Category 1 responders. The lead responder is responsible for coordinating the efforts of the non-lead responders, ensuring that non-lead responders are accomplishing their duties, and providing warnings when an emergency occurs. Overall, the LRF is the preliminary component emergency response because it "matches, in anticipation, prevention, and planning phases, the Gold group usually established by the police" during an emergency.[31]

Once an incident has occurred, the LRF response plan is initiated and the incident command system is activated. Each institution carries out its duties based upon the local emergency plan and the type and severity of the incident. Generally, the local police service,

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[26] Ibid., pp. 12.
[27] Civil Contingencies Act 2004, Schedule 1, Part 1.
[28] "Emergency Preparedness," *HM Government,* pp. 12.
[29] "Community Risk Register," *Central London Local Resilience Forum*, Version 1.1, October 2006.
[30] Ibid.
[31] "Emergency Preparedness," *HM Government*, pp. 14 – 16.

whose jurisdiction dictates the scope of the LRF, coordinates all activities of responders at the incident site.[32] As stated previously, the police incident commander is often the head of the Bronze, Silver, and Gold groups. In addition, the police have responsibility for setting up cordons around the incident site(s), protect the scene, and collect evidence if there is a suspicion of criminal or terrorist activity.[33] The fire and rescue services constitute the other emergency services involved in on-site activities. The fire brigades conduct rescue operations, hazardous materials management, damage control, and fire fighting/prevention.[34]

The health services, as categorized by the Civil Contingencies Act, have considerable emergency response obligations. At the local level, the ambulance trusts have primary responsibility to coordinate all National Health Service (NHS) resources at the scene, which includes transporting medical staff to the scene and casualties from it. In addition, ambulances alert hospitals to the incident, referring casualties to the appropriate locations based on emergency plans.[35] The Acute Trusts, managers of local hospitals, provide "general support and specialist healthcare to all casualties" and medial expertise to incident commanders.[36] In addition, to support from local health bodies, the SCG can receive support from NHS representatives. The Strategic Health Authorities, the local representatives of NHS, head up the NHS Strategic Command, which coordinates all NHS activities and resource allocations at the Gold level.[37] The health services, unlike other services, combine a mix of local and central government consultation in any emergency.

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[32] "Emergency Response and Recovery," *HM Government*, pp. 12.
[33] "Major Incident Procedure Manual," *LESLP*, pp. 12.
[34] Ibid.
[35] "The NHS Emergency Planning Guide 2005," *Department of Health, Emergency Preparedness Division*, 2005, pp. 15.
[36] "Emergency Response and Recovery," *HM Government*, pp. 13.
[37] Ibid., pp.29.

The other general component of local response is the local elected authorities. According to the Civil Contingencies Act, in England local authorities may be defined as a "county council, a district council, a London borough council, the Common Council of the City of London, and the Council of the Isles of Scilly."[38] The local authority is primarily responsible for supporting responders in an incident by providing facilities for use, maintaining day-to-day local activities, and taking the lead in rehabilitating the community once an incident has occurred.[39] The actual approach to response will be different in each locality depending upon statutory authorities, structure, and the type of incident. It is important to note that a single response area, based on the LRF's area of responsibility, will encompass more than one legally autonomous local authority. Thus, it is commonplace to coordinate local authority decision-making and nominate a single representative for LRF and response purposes.[40]

There are many other potential players in a local response depending upon the type and scale of the emergency. For example, the Environment Agency will become involved in any incident affecting public or environmental health. Should an incident occur at a port or on a vessel at sea, the port authorities would lend their expertise. The role of these other agencies in response is beyond the scope of this paper, but they have critical functions in particular types of emergencies.

REGIONAL

A recent development in British emergency management has been the development of the regional tier of planning and response. The set of regional organizations were designed to offer additional layer of protection in case an exceptional emergency overwhelms local response

[38] Civil Contingencies Act 2004, Part 1, 1.
[39] "Major Incident Procedure Manual," *LESLP*, pp. 49.
[40] "Emergency Preparedness," *HM Government*, pp. 19.

resources or affects an entire region of localities.[41] Specifically, the Regional Resilience Forums (RRFs) are designed to offer similar risk assessment and emergency planning functions as the Local Resilience Forums, only on a broader scale. The membership of RRFs and LRFs overlap, with members of the RRF sitting in on LRF discussions and vice versa. For example, "the chief executive of a local authority might chair the relevant LRF, and also be the local authority representative on the RRF."[42] In this way, LRFs are not subordinate to RRFs, but instead are linked through common membership and communication to offer different levels of support in an emergency.

RRFs meet on regular schedules, but relatively infrequently. They are chaired by the director of the regional Government Office (GO), who is responsible for providing a link between the central government and local responders.[43] This chair serves as the primary point of contact for disseminating information up to the national level and down to the local level. The membership of RRFs are representatives from Category 1 and 2 responders, including a single regional representative for the police force and fire authorities. A single person or a small group may represent the local authorities, depending upon the agreement between localities. In addition, the representation of the health authorities may fluctuate based upon "the regional context and the views of the health community in the region."[44] Additional membership depends upon regional circumstances, but the Environment Agency, the military, and the Government News Network will have representatives at the meetings.

As with LRFs, RRFs form the basis for membership and coordination within an operational response body, in this case the Regional Civil Contingencies Committees (RCCCs).

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[41] "Emergency Response and Recovery," *HM Government*, pp. 55.
[42] "Emergency Preparedness," *HM Government*, pp. 169.
[43] "Emergency Response and Recovery," *HM Government*, pp. 52.
[44] "Emergency Preparedness," *HM Government*, pp. 171.

RCCCs are activated in exceptional cases, usually when emergencies do not have an identifiable incident site and/or have a regional wide impact. RCCCs are likely to be activated if there are multiple local SCGs operating at the same time to provide singular coordination. They are not likely to be activated in the event of a single incident site emergency, in which case the local and national response would be more direct.[45] The key difference between the RRFs and the RCCCs is that the RRFs "have no role in responding to emergencies…[instead focusing on] co-ordination and planning for emergencies."[46] The RCCCs are responsible for maintaining a strategic awareness of the developing emergency, being a conduit for information sharing between local, regional, and national levels of government, and raising any issues that cannot be handled at the regional level to the national level for consideration.[47] Similar to the RRFs, the RCCCs are not superior to local response commands and do not get involved in operational tasks at the local level.

In addition to the RCCCs, Regional Resilience Teams (RRTs) operate under the guidance of each Government Office to be the first contact for any emergency related issues.[48] These teams are very small and serve as the initial contact between local, regional, and national responders or interested parties. RRTs are flexible and responsive, providing a quick jump-start to regional emergency response. Once an RCCC has been established, the RRTs will work in a support role, keeping records of meetings, arranging meeting locations, and creating agendas.[49]

NATIONAL

According to the "Central Government Arrangements for Responding to an Emergency," the British government has three objectives in responding to an emergency:

[45] "Emergency Response and Recovery," *HM Government*, pp. 57.
[46] Ibid., pp. 55.
[47] Ibid.
[48] "Emergency Preparedness," *HM Government*, pp 168.
[49] "Emergency Response and Recovery," *HM Government*, pp. 53.

- Protect human life and, as far as possible, property. Alleviate suffering;
- Support the continuity of everyday activity and the restoration of disrupted services at the earliest opportunity; and
- Uphold the rule of law and the democratic process[50]

In doing so, the central government does not seek to undermine local or regional authorities, but instead to react quickly to allocate resources, provide critical information to all stakeholders, and define the strategic context for emergency response. To accomplish these tasks, the British have followed a Lead Government Department (LGD) approach, which spreads the responsibility for emergency planning and response to many departments rather than making a single entity responsible for all coordination. In addition to LGDs, the Civil Contingencies Secretariat (CCS) was created to promote non-operational coordination and information sharing. The role of the CCS is to provide national standards for resilience planning and to alert all relevant stakeholders to potential incidents. The CCS also maintains the list of LGDs for different types of emergencies and has the important responsibility for selecting the LGD in the event that it is not clear (See Figure 1).[51]

Figure 1: List of Select Lead Government Departments	
Type of Emergency	**LGD**
Default Position	The Cabinet Office until specified by CCS
Terrorism – Conventional	Home Office
Civil Defense	The Cabinet Office and CCS
Flooding	Defra
Pollution from Ground and Surface Waters	Defra working with Environment Agency
Radiation Hazards	Defra (Home Office if related to terrorism, Department of Defense if on a nuclear installation)
Emergencies on Offshore Installations	Health and Safety Executive
Disasters Overseas	Department for International Development
Mass Influx of People From Abroad	Home Office
Severe Storms and Weather	CCS specifies depending upon the weather emergency

[50] "Central Government Arrangements for Responding to an Emergency: Concept of Operations," *HM Government*, 31 March 2005, pp. 5.
[51] "The Lead Government Department and its role – Guidance and Best Practice," *Civil Contingencies Secretariat, Cabinet Office*, March 2004, pp. 4.

Transport Accidents	Department of Transport
Disasters in Sporting Grounds	Department of Culture, Media and Sport
Earthquakes	Department for Communities and Local Government
Structural Failures in Buildings	Department for Communities and Local Government
Serious Industrial Accidents	CCS specifies depending upon the type of industrial accident
Electronic Attack	Home Office/Center for the Protection of National Infrastructure
Infectious Diseases	Department of Health and Health Protection Agency

LGD involvement has three levels of escalation depending upon the emergency:

- Level 1 – The response is coordinated by the Lead Department Minister from his/her premises with limited use of emergency facilities.

- Level 2 – The response is managed from the Cabinet Office Briefing Room (COBR), which will be explained in more depth later. If the incident is related to terrorism, the response always begins at this level and is managed by the Home Office, the LGD for terrorist incidents. Otherwise, the LGD manages from COBR when they resources outside their department will be required.

- Level 3 – The response is managed by the Prime Minster or nominated Secretary. Response at this level occurs when the incident is defined as "catastrophic" and requires immediate central government response and/or emergency powers to be activated.[52]

The LGD system is designed for all government departments to prepare for emergencies and maintain a state of readiness. Before an incident occurs, each potential LGD is required to conduct a capability assessment to determine what the department can handle and where gaps may occur. In addition, a risk assessment must be made to assess what scenarios might call for a particular department's involvement. Once plans have been made, they must go through annual audits internally and with CCS support.[53] Should an event arise when a particular department's emergency response functions may be utilized, they must produce a situation report about the incident for the Minister immediately. In addition, a handling plan must be created to determine

[52] Ibid.
[53] Ibid., pp. 11.

whether or not the LGD requires additional resources to respond to the emergency and the extent to which the central government should be involved.[54] The LGD approach requires each department to handle its own response planning rather than contributing staff to a central response body.

As noted previously, should a Level 2 or 3 emergency occur, the Cabinet Office Briefing Room (COBR) will be activated. COBR is a dedicated crisis management center that is only activated in major national emergencies, normally headed Prime Minster, Home Secretary or another Minister.[55] The purpose of this high-level body is to provide the strategic direction for catastrophic emergencies using national resources, intelligence assessments, macro level analysis, and advice from local and regional levels of response. Only COBR can decide the need for activation of emergency powers, authorize military assistance, manage the international consequences of the emergency, and share critical information with Devolved Administrations and local responders.[56]

If the central government is involved in emergency response, a Government Liaison Officer (GLO) will be immediately sent to the local SCG. The GLO will be the primary point of contact between COBR and the incident site(s).[57] If the emergency is related to terrorism, the GLO will be a senior Home Office official and will head up a Government Liaison Team (GLT) of multidisciplinary experts.[58] The GLO/GLT will ensure the flow of information and guidance between the central government and the local level in order to achieve strategic aims.

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[54] Ibid., pp. 7-8.
[55] "Emergency Response and Recovery," *HM Government*, pp. 77.
[56] "Central Government Arrangements for Responding to an Emergency: Concept of Operations," *HM Government*, pp. 11-12.
[57] Ibid., pp. 12-13.
[58] "Emergency Response and Recovery," *HM Government*, pp. 77.

The highest level of emergency response in Great Britain resides with the Prime Minister. Beyond standard legislative powers, the Prime Minster also has the ability to initiate emergency powers where "the existing legislation is insufficient to respond in the most effective way."[59] Procedurally, all emergency regulations are issued by order of the Crown, but the Prime Minister may also make them if time does not permit consultation.[60] Emergency regulations may be made under the following circumstances:

- An emergency has occurred, is occurring, or is about to occur;
- It is necessary to make provision for the purpose of preventing, controlling, or mitigating an aspect or effect of the emergency; or
- The need for provision referred to [above] is urgent.[61]

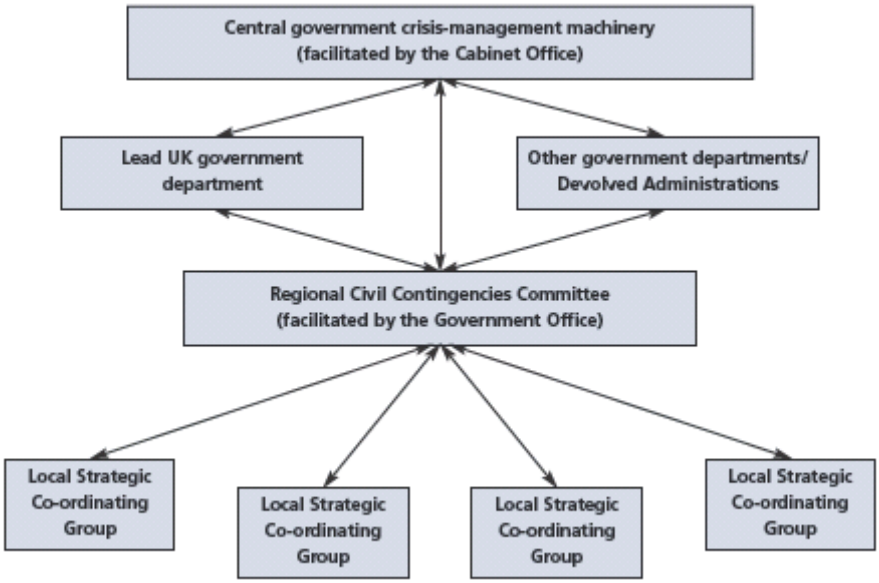
Emergency regulations can confer powers to a specified person, enable confiscation of property, prohibit movement to a particular place, enable/limit movement to a particular place, deploy the armed forces, or prohibit specified activities. They may not be used to force military service, prohibit strikes, create an offense with penalties more than three months in prison or amend part of the Civil Contingencies Act or the Human Rights Act of 1998.[62] The Prime Minister is required to submit the regulations to Parliament at the first available opportunity. Emergency regulations will automatically lapse thirty days after they have been made.

The national level of response in the United Kingdom is based upon the LGD approach, which draws all government agencies into emergency response at some level. In addition, the Prime Minister, in the event of a catastrophic emergency, may become intimately involved with emergency response from a strategic perspective. Although both COBR and the LGDs have extensive resources and power, they do not get involved in the immediate, on-scene operational

[59] Ibid., pp. 79.
[60] Ibid.
[61] Civil Contingencies Act of 2004, 21(2) – 21(4).
[62] Ibid., 23(3)-23(5).

response. They allocate appropriate resources and strategic guidance to the local level through GLOs/GLT and the regional tier.

Figure 2: British Emergency Response Structure when an RCCC has been Activated.



"Emergency Response and Recovery," *HM Government*, November 2005, pp. 58.

American Emergency Response

Incident Command Structure

Similar to the British system, emergency response in the United States is managed at "the lowest possible jurisdictional level and supported by additional capabilities when needed."[63] The American emergency response system is also based upon a flexible incident command system, called the National Incident Management System (NIMS), and is designed to expand as a crisis grows in size or complexity. These guidelines define an emergency more generally as "any incident(s), whether natural or manmade, that requires responsive action to protect life or property."[64] A more specific definition can be found in the Robert T. Stafford Disaster Relief and Emergency Assistance Act, which defines an emergency as

[63] "National Response Framework," *Department of Homeland Security*, January 2008, pp. 10.
[64] Ibid.

> Any occasion or instance for which, in the determination of the President, Federal assistance is needed to supplement State and local efforts and capabilities to save lives and to protect property and public health and safety, or to lessen or avert the threat of a catastrophe in any part of the United States.[65]

The difference between these definitions is important because the activation of emergency plans at the state and Federal levels is largely dependent upon formal declarations by Governors and/or the President.

American emergency response organizations use NIMS at the local, state, and Federal levels. NIMS was included in the *National Response Plan* with the purpose to create a single, uniform response structure for all organizations at all levels of government. According to the Department of Homeland Security, the benefits of NIMS include

- Standardized organizational structures, processes and procedures.
- Standards for planning, training, and exercising and personnel qualification standards.
- Equipment acquisition and certification standards.
- Interoperable communications processes, procedures, and systems.
- Information management systems.
- Supporting technologies – voice and data communications systems, information systems, data display systems, and specialized technologies.[66]

More specifically, NIMS contains the outline of the incident command structure that is also used at all levels of American emergency response. This structure, called an Incident Management Team (IMT) has a "modular organization," which means that functional elements can be added or subtracted depending on the situational imperatives.[67]

There are two types of command groups in an IMT, a single Incident Commander or a Unified Command. If an incident occurs within a single jurisdictional and functional boundary, a single Incident Commander will likely be designated. In many cases, this Incident Commander will be pre-designated based upon the type of emergency that occurs as per response plans. The

[65] "National Incident Management System," *Federal Emergency Management Agency*, pp. 150.
[66] Haddow, George D., pp. 120.
[67] "National Incident Management System," *Federal Emergency Management Agency*, pp. 45.

Incident Commander will lead the response and approve the Incident Action Plan (IAP), which sets the strategy and objectives for that particular emergency.[68] The advantage of an Incident Commander is simplicity of response, with a single authority setting all strategic, tactical, and operational objectives within their jurisdiction.[69] If the incident is complex however, the use of a single Incident Commander may be sufficient to lead all aspects of response.

The other command option is a Unified Command, which allows all agencies with jurisdictional or functional responsibility to contribute in strategic planning for response.[70] In a Unified Command each agency maintains its own independent authorities, but they work together to establish a joint IAP. The composition of a Unified Command can vary widely depending on the type of incident, geographic location, and the level of government upon which it is employed. If an agency has interests in emergency response, but no jurisdictional authority in the incident, they may be involved in Unified Command as a supporting agency, represented through a Liaison Officer in a Unified Command. A Unified Command has clear advantages in a complex emergency. Unlike a single Incident Commander, a Unified Command can promote information sharing and coordination among widely different agencies, which is critical in multi-agency or multi-jurisdictional incident. Since the Unified Command operates based on consensus, all agencies involved must be familiar with each other's roles and their responsibilities in order to be effective. With the tremendous amount of different American agencies potentially involved in any emergency, this is not a simple task.

Beyond the Incident Command, the IMT is composed of two supporting structures, the command staff and the general staff. Like the other IMT structures, the command staff may

[68] Ibid., pp. 48.
[69] This jurisdiction could be geographic or tiered, depending on the organization/agency employing the ICS at the type.
[70] Ibid.

expand to meet the requirements of the emergency. At a basic level it generally consists of a Public Information Officer, Safety Officer, and Liaison Officer. The Public Information Officer is responsible for maintaining an up-to-date appraisal of the incident scope, complexity, and committed resources for the public or other interested agencies/officials. The Safety Officer is responsible for monitoring the physical safety of personnel conducting response operations. Finally, the Liaison Officer is the point of contact for agencies or organizations with no direct involvement in the emergency but a potential responsibility in response recovery. In other words, the Liaison Officer ensures that outside organizations can adequately support the emergency response.[71] These positions, including any other ad hoc additions to the command staff, take pressure off Incident Command by handling non-operational issues related to the emergency.

The general staff is the functional branch of the IMT. It typically consists of operations, planning, logistics, and finance/administration sections, but can be expanded to include other functional areas.[72] Each section is headed by a Section Chief who is encouraged to have deputies. In addition, each section is structurally flexible, with no set subdivisions before an emergency occurs. According to NIMS, the operations section is responsible for "all activities focused on reducing the immediate hazard, saving lives and property, establishing situational control, and restoring normal operations."[73] This section is broken up into branches and smaller divisions by function and/or geography depending on the size and complexity of the incident.[74] The planning section is responsible for preparing the IAP and providing situational reports and intelligence analysis to Incident Command. Although the planning section prepares the IAP, the operations section and Incident Command provide considerable guidance. The logistics section ensures that

[71] Ibid., pp. 50-51.
[72] Ibid., pp. 52.
[73] Ibid.
[74] Ibid.

emergency responders and Incident Command staff have all the resources they need, which includes food, fuel, health services, and facilities.[75] Finally, the finance/administration section handles all funding allocations for personnel purposes and maintains a record of the cost of the emergency.

The American ICS has structural options to expand should an emergency affect a large area. If there are multiple incident sites in relatively close geographical proximity to each other, an Incident Complex may be established. An Incident Complex functions under a single Incident Command, either a single Incident Commander or Unified Command, and places all individual incidents under the operations section as different branches.[76] In an Incident Complex, the planning, logistics, and finance/administration sections must handle the burden of multiple incident sites at once. Thus, in complicated or geographically dispersed incidents, an Incident Complex cannot adequately handle the emergency.

The other organizational option for large-scale emergencies is an Area Command. In this case, an additional layer of command is established above the Incident Commanders/Unified Commands. An Area Commander or Unified Area Command, in case of a multi-jurisdictional response, will be established to coordinate the efforts of separate IMTs. Area Command takes a more strategic role, working to ensure effective resource allocation, consistent response objectives and priorities, and communications between all IMTs.[77] It is most likely to be used when the emergency is dispersed over a large area or does not have a containable incident site, as is the case during many public health emergencies. Area Commands coordinate multiple incidents related by geography and/or type in order to assure a consistent and effective response to an emergency.

[75] Ibid., pp. 56.
[76] Ibid., pp. 60-61.
[77] Ibid., pp. 61-62.

The American incident command structure also has coordination mechanisms that operate above the field level, called Multiagency Coordination Systems (MACS). The purpose of MACS is to establish protocols for emergency planning, response, recovery, and prevention between agencies. A MACS agreement is usually formalized in writing and integrates communications, procedures, and protocols into a common working environment.[78] When an incident occurs, a MACS agreement may prompt the creation of two bodies: a MAC Group and/or an Emergency Operations Center (EOC). A MAC Group, established away from the scene, is responsible for setting strategic objectives and allocating organizational resources in emergency response. Although the MAC Groups have no direct authority over incident operations, they are composed of high-ranking executives that have the authority to commit their organization's resources freely.[79] MAC Groups work at a high level to streamline resources allocation that might otherwise get tied up in intra-departmental squabbling. Unlike MAC Groups, EOCs are very flexible structures that can be established at any level of government in order to facilitate "coordination, communications, resource allocation and tracking, and information collection."[80] EOCs are located close to the scene and are designed to take the pressures of multi-agency resource coordination away from responders at the scene. They coordinate resource distribution from higher levels of government to emergency responders in the field. EOCs and MAC Groups offer a standard coordination element that can be employed at many different levels of government.

The ICS is a complicated system that admittedly requires extreme familiarity with all other emergency response structures and organizations. The NIMS guidelines layout IMT structures in depth, providing a flexible organizational structure for emergency response in the

[78] Ibid., pp. 63.
[79] Ibid., pp. 66, 68.
[80] Ibid., pp. 66.

United States. Since the ICS principles are used at all levels of government, transitions in jurisdiction or stages of response should flow smoothly.

Institutional Progression of Emergency Response

LOCAL

In the United States, local response is based on the township or county area. Rather than having a dedicated emergency planning center at the local level, a Local Emergency Manager is designated to develop emergency response plans. Often times the Local Emergency Manager is part of the local police or fire department and performs his/her duties in a part-time capacity.[81] There are no Federal statutory guidelines as to how a Local Emergency Manager must approach his duties, who he/she must consult, or what specific plans must be created. Instead, this manager works with other local organizations in an informal capacity to establish local response responsibilities, develop training, mutual aid, and rigorous exercise programs. The specifics of emergency response planning at the local level are largely left up to the locality to decide, including how to plan and organize local emergency response structures.

When an emergency occurs, a local Incident Command Post (ICP), the deployment of an IMT, is established immediately to coordinate all on-scene response efforts. The membership and the structure of the local ICP should be laid out in the local emergency response plan. If necessary, an Area Command is set up to coordinate multiple ICPs. If the local elected official, with input from the Incident Commander/Unified Command, determines more resources are required, he/she will activate the local EOC.[82] During the emergency, the Local Emergency Manager is responsible for ensuring the local EOC is properly staffed to assist incident

[81] Haddow, George D., pp. 103.
[82] Haddow, George D., pp. 114.

command. Should the emergency overwhelm local resources, the local elected official will request aid from the state Governor.

STATE LEVEL

In the United States, the emergency response structure of each State varies widely, often based on how often that area experiences disasters.[83] For example, the North Carolina Department of Emergency Management has been unusually proactive in warehousing vital supplies and establishing pre-designated Area Commands in strategic locations across the State. [84] California operates its emergency response system based upon the Standardized Emergency Management System (SEMS), as mandated by State law. This system uses the ICS, but mandates the use of a Regional response tier between the State and local levels. California's State response system also requires that local governments adhere to SEMS in order to be eligible for certain aspects of State response funding.[85] Thus, although Federal emergency response requirements may be general, many State governments have enacted their own unique requirements that function within NIMS. This does not imply that different States are more or less prepared than others, merely that they have taken different structural approaches.

From an institutional perspective, state emergency operations are run from the State EOC. The State EOC is composed of senior elected officials and is located off-scene. Its purpose is to coordinate all state resources and allocate them appropriately in support of local operations. The State Governor activates the State's emergency plans when assistance is requested from local officials or local resources are clearly overwhelmed. If the Governor deems that the emergency has or threatens to overwhelm State resources he/she will send a letter to the

[83] Ibid., pp. 107.
[84] Ibid.
[85] "State of California Emergency Plan," *Office of Emergency Services Planning Section*, September 2005, pp. 5.

President requesting Federal assistance. The first step in the declaration process requires the Governor to make contact with Federal Emergency Management Agency (FEMA) officials at their regional centers to request a Preliminary Damage Assessment.[86] This assessment is a used to satisfy the provisions of The Stafford Act, which states that

> A [disaster declaration] request shall be based on a finding that the disaster is of such severity and magnitude that effective response is beyond the capabilities of the State and the affected local governments and that Federal assistance is necessary…The Governor shall furnish information on the nature and amount of State and local resources which have been or will be committed to alleviating the results of the disaster.[87]

Once the Preliminary Damage Assessment has been made the FEMA Regional Office makes a recommendation to FEMA headquarters. High-level FEMA staff makes a subsequent recommendation for action to the President for a decision. Under the Stafford Act, the President may use his/her discretion in declaring an emergency; there are no specific criteria that must be met for the Stafford Act to be employed. If the President declares an emergency or major disaster, the provisions of Stafford Act may be used to assist in the State and local response.

FEDERAL

According to Homeland Security Presidential Directive 5 (HSPD-5), the Secretary of Homeland Security is the "principle Federal official for domestic incident management."[88] The Secretary is responsible for maintaining and implementing NIMS guidelines and ensuring that all States and localities prepare adequately for emergencies. In addition, the Secretary coordinates all Federal resources and directs other departments and agencies that have a role in emergency response.[89] During an emergency the Secretary activates relevant elements of the *National Response*

[86] Haddow, George D., pp. 115.
[87] The Robert T. Stafford Disaster Relief and Emergency Assistance Act, as Amended, and Related Authorities, *FEMA 592*, June 2007, Title IV, Sec. 401.
[88] Bush, George W., "Homeland Security Presidential Directive 5," *The White House*, 28 February 2003. (4).
[89] "National Response Framework," *Department of Homeland Security*, pp. 54.

Framework with the assistance of the FEMA Administrator. The *National Response Plan* and its appendices provide detailed instructions for Federal coordination with State and Local governments, Departmental responsibilities, and protocols for response to specific types of emergencies. According to HSPD-5, the Secretary of Homeland Security will coordinate the Federal response

1. A federal department or agency acting under its own authority has requested the assistance of the Secretary;
2. The resources of State and local authorities are overwhelmed and Federal assistance has been requested by the appropriate State and local authorities;
3. More than one Federal department or agency has become substantially involved in responding to the incident; or
4. The Secretary has been directed to assume responsibility for managing the domestic incident by the President.[90]

The FEMA Administrator executes the Secretary's strategy and coordinates the Federal emergency response effort from the National Response Coordination Center (NRCC). The NRCC is part of the National Operations Center (NOC), which is a "continually operating multiagency operations center" responsible for collecting and disseminating important situational information during an emergency.[91] The NRCC, run by FEMA, monitors ongoing or potential incidents and supports Federal response efforts at the regional and field level. In addition, the NRCC resolves any resource or priority conflicts that might arise between Federal agencies and departments.[92]

The NRCC coordinates 32 signatory parties to the *National Response Framework*, which includes Federal departments, agencies, and NGOs. These organizations are utilized through 15 Emergency Support Functions (ESFs), which are divided by functional capability (See Figure 3). Each ESF has a primary agency and supporting agencies. The primary agency of each ESF

[90] Bush, George W., (4).
[91] "National Response Framework," *Department of Homeland Security*, pp. 55.
[92] Haddow, George D., pp. 130-131.

coordinates all efforts related to that functional area and coordinates with other activated ESFs as necessary. Support agencies provide personnel and expertise to the primary agency and will execute tasks laid out by the primary agency or DHS.[93] ESFs may be deployed by FEMA via the NRCC to any tier of response, providing an "effective way to bundle and funnel resources and capabilities to local, tribal, State, and other responders."[94] ESFs allow FEMA to be an all-hazards central coordinating agency as opposed to having one or more of primary agency leading the response.

Figure 3: Emergency Support Functions (ESF) and Department Leads[95]	
ESF Description	**Coordinating Department/Agency and Responsibilities**
ESF 1 – Transportation	Coordinator: Department of Transportation Responsibilities: Aviation management, transportation safety, restoration and recovery of transportation infrastructure.
ESF 2 – Communications	Coordinator: DHS (National Communications System) Responsibilities: Protection, restoration and repair of telecommunications infrastructure.
ESF 3 – Public Works and Engineering	Coordinator: Department of Defense (U.S. Army Corps of Engineers) Responsibilities: Infrastructure protection, emergency repair, and restoration.
ESF 4 – Firefighting	Coordinator: Department of Agriculture (U.S. Forest Service) Responsibilities: Coordination of Federal firefighting activities.
ESF 5 – Emergency Management	Coordinator: DHS (FEMA) Responsibilities: Incident action planning, coordination of incident management and response efforts.
ESF 6 – Mass Care, Emergency Assistance, Housing, and Human Services	Coordinator: DHS (FEMA) Responsibilities: Mass care, emergency assistance, disaster housing.
ESF 7 – Logistics Management and Resource Support	Coordinator: General Services Administration and DHS (FEMA) Responsibilities: Comprehensive, national incident logistics planning, management, and sustainment capability.
ESF 8 – Public Health and Medical Services	Coordinator: Department of Health and Human Services Responsibilities: Public health, medical, mass fatality management.
ESF 9 – Search and Rescue	Coordinator: DHS (FEMA) Responsibilities: Search and rescue operations.
ESF 10 – Oil and Hazardous Materials Response	Coordinator: Environmental Protection Agency Responsibilities: Oil and hazardous materials response.
ESF 11 – Agriculture and Natural Resources	Coordinator: Department of Agriculture Responsibilities: Animal and plant disease and pest response, food safety and security.
ESF 12 – Energy	Coordinator: Department of Energy Responsibilities: Energy infrastructure protection, repair, restoration.
ESF 13 – Public Safety and Security	Coordinator: Department of Justice Responsibilities: Security planning, public safety and support, crowd

[93] Ibid., pp. 122-123.
[94] "National Response Framework," *Department of Homeland Security*, pp. 57.
[95] Ibid., pp. 59 – 60.

	control.
ESF 14 – Long-Term Community Recovery	Coordinator: DHS (FEMA) Responsibilities: Social and economic community impact assessment, long-term community recovery assistance to States and localities.
ESF 15 – External Affairs	Coordinator: DHS Responsibilities: Public information, media relations, Congressional and international affairs.

In addition to coordinating and deploying ESFs, FEMA also maintains 10 Regional Offices. These Regional Offices allow FEMA to ensure that State and local officials have the support they need in designing and implementing emergency response plans. Contained within each Regional Office is a Regional Response Coordination Center (RRCC), which are continually operating organizations headed by the FEMA Regional Administrator and staffed by ESFs when an emergency occurs. RRCCs coordinate Federal response efforts in the region and maintains close contact with State EOCs once an emergency occurs.[96] When Federal resources begin to be deployed on a wide scale, RRCC responsibilities shift to the primary Federal response structure at the field level, the Joint Field Office (JFO).

The JFO is a NIMS based structure, similar to a ICP, but does not manage on-scene operations. Instead, the JFO focuses on coordinating response efforts that "extend beyond the immediate incident site" using Federal resources.[97] The JFO is activated by the Secretary of Homeland Security and brings together select State and Federal officials in an effort to coordinate all response efforts of the incident site. The JFO contains a Unified Coordination Group or Unified Command similar to that of an ICP. The JFO's Unified Coordination Group is comprised of State Coordinating Officer, Federal Coordinating Officer, Principal Federal

[96] Ibid., pp. 61.
[97] "Joint Field Office Activation and Operations: Interagency Integrated Standard Operating Procedure," *Department of Homeland Security*, Version 8.3, April 2006, pp. 6.

Official, a Senior Federal Law Enforcement Official, a Defense Department Representative, and other senior officials.[98]

The Principal Federal Official (PFO) is designated by the Secretary of Homeland Security to represent him/her at the field level to ensure all objectives and responsibilities are carried out effectively.[99] On the other hand, the Federal Coordinating Officer (FCO) is responsible for managing Federal assistance at the field level for emergencies in which the Stafford Act has been activated. The FCO is recommended by the FEMA Administrator and represents him/her at the field level and JFO. The PFO does not have direct authority over the FCO, which created communications problems during the response to Hurricane Katrina. The Senate report on Hurricane Katrina states that "both positions have coordination responsibilities, but they are not clearly distinguished"[100] Indeed, even the updated *National Response Framework* of January 2008 remains vague as to the objectives and responsibilities of the FCO and PFO and how they are to operate in relation to one another.

The JFO funnels Federal resources through the State EOC down to the local level. JFO staff can be drawn from many areas, but during serious emergencies ESF-5, the Emergency Management function, will provide personnel to operate the JFO. Depending on the type of incident, the JFO will take different structures and responsibilities. The largest projected deployment of a JFO would be for a terrorist attack, which would entail activation of an intelligence division in the Operations branch and the use of the Finance/Administration

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[98] "National Response Framework," *Department of Homeland Security*, pp. 63.
[99] "Joint Field Office Activation and Operations: Interagency Integrated Standard Operating Procedure," *Department of Homeland Security*, pp. 11.
[100] "Hurricane Katrina: A Nation Still Unprepared," Committee on Homeland Security and Government Affairs, *United States Senate*, 109th Congress, pp. 553.

branch.[101] As with the ICP, the JFO is designed to expand its operations based on the size and type of the emergency.

Comparative Analysis

Structural Differences

Not only do the United States and United Kingdom have different emergency response structures, they are vastly different countries. The United States is over thirty seven times the size of the United Kingdom. In addition, the United States contains five times the population of the UK. Due to such dramatic differences in size, population, and population density, it must be expected that each country take a different institutional approach to emergency response. From a political perspective, the United States has a long history of Federalism, which requires emergency response institutions to be shaped around a considerable degree of State and local autonomy. The United Kingdom, on the other hand, has Devolved Administrations to contend with, but their emergency response structures generally differ in name only.

Despite these key differences, there is considerable utility to comparing emergency response institutions between the US and UK. Both countries have had recent experience responding to terrorist attacks and have vastly restructured their emergency management institutions as a result. In addition, both countries take a localized approach to emergency response, preferring for local responders to handle the incident site with assistance as needed from the central government. This philosophical similarity allows an institutional analysis of emergency response structures to compare differences in execution.

Incident Command Structures

[101] "Joint Field Office Activation and Operations: Interagency Integrated Standard Operating Procedure," *Department of Homeland Security*, pp. 13.

Emergency response planning is the foundation upon which response institutions are organized and operational objectives are defined before an incident occurs. In the United Kingdom, LRFs and RRFs are standing organizations designed to form multi-agency emergency response plans. These organizations bring Category 1 and 2 responders together to "address all aspects of policy in relation to…planning for emergencies."[102] With regular meetings at least every six months, emergency response plans and risk assessments are kept as up-to-date as possible and multi-agency communication at the local and regional levels is strong. In the United States, however, there is no consistent, statutory guidance for local/regional emergency response planning. Instead, the local elected official selects a Local Emergency Manager whose duty it is to coordinate "all components of the local emergency management program."[103] Although it is recommended that this manager coordinate with local responders, there is no standing body or Federal guidelines to ensure this process occurs consistently in all localities. As stated previously, there may be State laws governing emergency response, but Federal regulates are broad based. LRFs and RRFs provide standardization across wide areas, requiring that all localities make adequate preparations for emergency response in consultation with all relevant stakeholders.

Beyond planning, there are many similarities between British and American incident command structure. Both the *NIMS* and *Emergency Response and Recovery Guidelines* recommend making use of collective command arrangements in complex emergencies. In addition, both incident command structures shift strategic decision making upwards from the local level should additional resources be required. The collective command principle behind Gold, Silver, and Bronze commands is also present within the American ICS. For example, both

[102] "Emergency Preparedness," *HM Government*, pp. 11.
[103] "National Response Framework," *Department of Homeland Security*, pp. 16.

command systems bring in all relevant agencies/organizations responsible for emergency response in order to develop an incident action plan.

Despite these broad similarities, British and American incident command structures divide strategic, operational, and tactical functions quite differently. In the UK, the Gold, Silver, and Bronze commands comprise the strategic, tactical, and operational levels of emergency response, creating a hierarchy of responsibility that limits functional overlap. Should the emergency overwhelm local resources, the British strategic command will "shift upwards from the local level, although the functions of the bronze, silver, and gold teams at the local level will remain broadly the same."[104] In other words, additional emergency response layers are added vertically to augment local response. The American Incident Command Post combines the strategic, tactical, and operational functions into a single body at the local level. Instead of having three separate command structures operated by increasingly high-ranking representatives, American ICPs and Area Commands function based on a single decision-making body. Thus, although both the British and American strategic coordination roles shift upwards as the emergency grows more complex, at the local level, American emergency response functions remain confined to the ICP(s)/Area Commands at the operational level.

Institutional Differences

As an incident grows in complexity and/or has implications of interest to higher levels of government, emergency response will escalate beyond the local levels in the US and UK. The United States has a formalized process for emergency response escalation, a byproduct of American federalism. When an emergency occurs local responders notify the State of an emergency and provide them regular Situation Reports (SITREPs).[105] In order for State

[104] "Emergency Response and Recovery," *HM Government*, pp. 21.
[105] "State Disaster Management Course," *Emergency Management Institute,* IS 208, Unit 3, 5.

governments to become involved in emergency response, the local authorities must request for the State aid via the State emergency management agency. Should State and local resources be overwhelmed, the Governor may coordinate with the FEMA Regional Offices to request Federal assistance. In rare circumstances, the President can unilaterally declare an emergency based on a finding by the FEMA Regional Administrator that State and local resources are overwhelmed and that Federal aid is required.[106] Federal response coordination can occur without a Presidential declaration, but many financial support programs, particularly long-term recovery funding require a formal declaration. Barring a very extraordinary occurrence, American emergency response escalates based upon a hierarchy of formal requests between the local, State, and Federal levels.

In the United Kingdom, response escalation is done on a more informal basis. Within the British incident command structure, Silver and SCG groups are activated based upon a request from the "lower level" command group. A RCCC may be activated at the request of either a member of the local SCG, the corresponding RRF, or LGD.[107] Immediately after an emergency occurs, the designated LGD begins to monitor the situation and creates a handling plan, which includes an assessment of whether or not central government coordination is needed.[108] Based on this assessment and communication with the Civil Contingencies Secretariat, the LGD level of engagement is defined, which indicates the need for COBR involvement. Thus, in the UK, local and central government response agencies activate simultaneously, albeit in a preparatory role. This is not to say that American Federal agencies do not monitor and plan for involvement in emergency response; the National Operations Center, the NRCC, FEMA, and many other

[106] "National Response Framework," *Department of Homeland Security*, pp. 41.
[107] "Emergency Response and Recovery," *HM Government*, pp. 57.
[108] "The Lead Government Department and its role – Guidance and Best Practice," *Civil Contingencies Secretariat, Cabinet Office*, pp. 7-8.

institutions immediately prepare for potential Federal involvement. The difference is, however, that British central government involvement is based upon an interpretation of necessity from the LGD and CCS rather than a request from the affected localities.

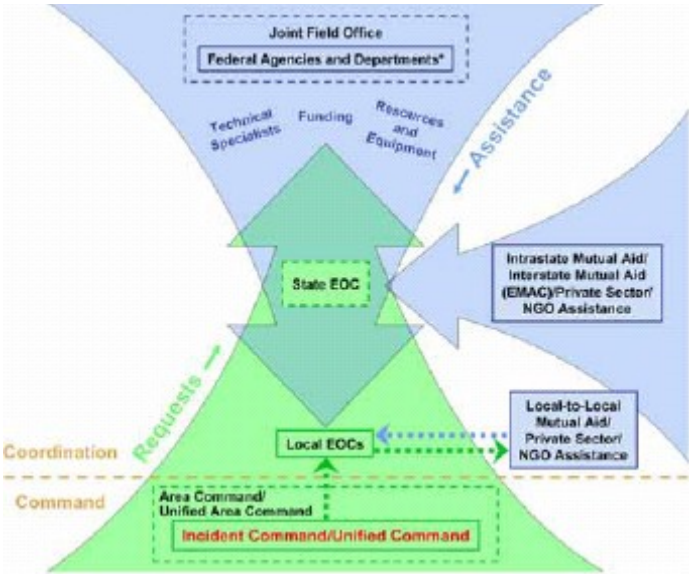
In both countries, the regional tier has been a relatively new addition to emergency response escalation. Although the general principle of the regional tier remains the same, the function of regional institutions varies greatly between the two countries. In the United States, the 10 FEMA Regional Offices serve to assist State and local responders in planning for emergencies and offer their expertise during a response. The key structure for American emergency response is the Regional Response Coordination Center, which is staffed continually. In the initial stages of an emergency the RRCC assess the impact of the incident, gauges immediate needs, and coordinates initial Federal support.[109] These functions are transferred to the field level once a JFO has been established. Thus, the American regional tier does not have a prolonged role in the immediate emergency response.

In the United Kingdom, the regional tier has a more involved role in emergency response planning and coordination. The RRFs have are a formalized regional planning organization that coordinates multiple jurisdictions and authorities to prepare for emergencies. Once an incident occurs, the Regional Civil Contingencies Committees perform become one of the primary liaisons between the central government and the local level. With the assistance of the Government Offices, the RCCCs highlight important situational information to the national level and relay strategic guidelines down to the local level. In this way, the British regional tier is more closely related to the State level than it is to the American regional tier. The State EOCs direct resources and relay information from the JFO to the Local EOCs and ICPs/Area Commands, linking the Federal and local response tiers (See Figure 4). Federalism in the United

[109] "National Response Plan," *Department of Homeland Security*, pp. 44.

States has prompted functions performed by the British regional tier to be performed by a combination of the American regional and State response levels.

Figure 4: Request and Assistance Flows Between the Federal, State, and Local Governments



"National Incident Management System," *Federal Emergency Management Agency*, FEMA 501/Draft August 2007, pp. 36.

Linked to the principles behind regional response tiers is the direct, field level coordination between the national and local levels. Both central governments maintain close contact with the incident site in some form. In the United States, these links are primarily sustained through the State level. The State Coordinating Officer, who serves in the Unified Coordination Group in the JFO, is responsible for communicating with the local level. The Federal government may also link to ICPs by deploying ESFs as required, although these are support bodies, not necessarily senior leadership. Finally, the Principal Federal Officer is the highest level link between the Federal government and the affected locality. Specifically, the PFO is required to work with the SCO to "establish an effective communications network with State and local agencies."[110] Additional details into how this is to be done have not be made clear.

[110] "State Disaster Management Course," *Emergency Management Institute,* 1.10 – 1.11.

Communication between the national and local governments in the United Kingdom must go through fewer layers, primarily because of Britain's much smaller size and bureaucracy. Even so, however, the connection between the national government and the incident site is made clearer than in the United States. If the UK central government is involved in any emergency response, a Government Liaison Team (GLT) is immediately sent to the incident site. The Government Liaison Officer (GLO), head of the GLT, will be a senior official from the relevant LGD or Government Office in a non-terrorist incident. If the emergency is related to terrorism, the GLO will be from the Home Office.[111] Since the GLO/GLT is present at the scene, they provide a direct line of communication between COBR and responders at the incident site, connecting the highest levels of government with operational personnel.

The primary difference between British and American emergency response structures is their different approaches to overall national level management. Throughout this paper I have highlighted the difference between a centralized, single agency approach and a multiagency approach to emergency response coordination. In the United States, FEMA, under DHS, takes the lead in coordinating nearly all emergency response functions at the national level. FEMA, as instructed in HSPD-5, maintains the *National Response Plan* and *National Incident Management System*, plans designed to create a uniform approach to emergency response throughout the United States. Both documents lay out the necessary elements of emergency response planning, including how to create, exercise, and audit these individual plans. Also, unlike in the UK, FEMA controls the regional tier of planning and response through its ten Regional Offices. Before an incident, these offices lend their expertise to State and local governments to support effective emergency response planning. Once an emergency occurs, FEMA personnel are

[111] "Emergency Response and Recovery," *HM Government*, pp. 77.

integral at all levels of emergency response, from Preliminary Damage Assessments, review of disaster declarations, coordination of ESFs, to leading the national response at the NRCC.

In the United States, FEMA is the central emergency *management* agency with the primary purpose of ensuring that all levels of government are adequately and uniformly prepared for any emergency. When an incident occurs, FEMA becomes an emergency *response* institution, shifting its role toward resource allocation and strategic guidance as required. Since FEMA is founded upon a national all-hazards response doctrine, they take the lead in all types of emergency scenarios. ESFs, which may be coordinated and/or assisted by other agencies/departments, add supplemental capability to all levels of governments, but do not take the lead in emergency response. Since FEMA activates the ESFs, they are extensions, albeit important ones, of FEMA's central management authority.

The LGD principle in the United Kingdom decentralizes national emergency management coordination to a certain extent. Before an incident occurs, the Civil Contingencies Secretariat has a similar emergency response planning role to FEMA. The CCS provides expertise, resources, and statutory guidance for local governments and potential LGDs for emergency response planning. Once an incident occurs, CCS takes on an advisory role, designating the LGD should there be any confusion. In the UK, it is the LGD that takes the lead in national emergency response. Based on the type of incident a pre-designated department with relevant expertise takes control of the response. This system requires that a wide-range of departments and agencies must be prepared to actively engage in emergency response. Each LGD will be well equipped to handle specified emergency scenarios within their field of expertise. To make an analogy, LGDs operate as ESFs would if they were clearer, autonomous roles.

Unlike in the United States, an incident of critical national concern can be escalated to COBR, an established body above the LGDs. Thus, should an emergency occur that affects multiple potential LGDs, COBR can step in to ensure coordination and a unified response strategy. COBR, unlike FEMA, is not a standing emergency management agency, but is activated to coordinate national emergency response if required. COBR ensures that the United Kingdom has a method for central control if necessary, but allows each LGD to responds to "lesser" emergencies based on their expertise.

Recommendations

The purpose of this paper has been to compare British and American emergency response structures in order to uncover best practices that may not have been discovered without looking beyond American borders. The British have established LRFs, which must meet statutory emergency response planning requirements. The Civil Contingencies Act of 2004 sets out the responsibilities of local emergency responders, providing a consistent context within which emergency plans can be made. The United States does not have a single listing of local responsibilities or a uniform structure for execution of these duties. Individual States require different compliance standards and planning organizations for localities. Despite States facing different and/or wide-ranging threats, the President should push for Congressional legislation outlining the basic requirements for local emergency planning. This legislation would move NIMS beyond a uniform template into enforceable law that can be regulated by State governments and monitored by FEMA Regional Offices. In addition, this legislation should go beyond NIMS to spell out basic operational imperatives of local emergency responders in incident planning, similar to the Civil Contingencies Act of 2004. NIMS is admittedly doctrine and principle, not an operational or regulatory guide.[112]

[112] "National Incident Management System," *Federal Emergency Management Agency*, pp. 3.

In addition to adding statutory regulation to American emergency planning, FEMA should investigate diversifying its heavy burden in emergency response. FEMA permeates all levels of government during an incident, requiring a massive degree of coordination not only between State, local, and Federal agencies, but internally as well. Hurricane Katrina showed that FEMA, as currently structured, could not communicate internally, allocate resources, or mobilize equipment/personnel effectively. Since ESFs serve to supplement, not lead, emergency response, FEMA must bear responsibility for managing these departments' personnel as well. Since FEMA is a single agency, there is no COBR-like body that brings together the managers of all potential agencies/departments for emergency response. COBR is not a mere Cabinet level meeting; it has direct contact with the incident site through GLOs/GLTs and establishes strategic objectives collectively. The Homeland Security Council, the closest in structure to COBR, is designed to "provide national strategic and policy advice to the President during large-scale incidents that affect the Nation," not to provide a forum for decision-making with a single department head/the President as the arbiter.[113]

FEMA should examine how they key diversify some of the emergency response responsibility to other departments. The British divided responsibilities based upon functional expertise, which may work for the United States based on the viability of the ESFs. FEMA should not be stripped of its powers, but it should be treated as a single player in emergency response, not the sole national agency. There needs to be a powerful, decision-making forum for all relevant agencies to establish national strategy on a consensus basis in an emergency. Hurricane Katrina showed that with such heavy responsibilities, FEMA needs assistance coordinating its wide range of responsibilities. With a high-level coordination and planning body, agencies/departments with emergency response responsibilities can become familiar with a

[113] "National Response Framework," *Department of Homeland Security*, pp. 24.

consistent collective decision-making process during a major emergency. FEMA, as the central American agency for emergency management, plays too pivotal a role in emergency response to leave unchecked and uncoordinated.

Conclusion

The United Kingdom and United States share the same "bottom-up" philosophy in emergency response. Despite this key similarity, both countries have arranged their decision-making structures in vastly different ways. The British have pursued a more decentralized approach than the United States, delegating lead emergency response responsibilities to different government departments at the national level. In order to continue to learn from comparative experience, more research is needed into the difference between a central agency and multiagency response system in practice. Unfortunately, until another major emergency occurs in both countries, research possibilities must remain in the theoretical realm. Nevertheless, this paper merely scratches the surface of possible research into comparative emergency response. Institutions and decision-making structures must continue to evolve in order to keep ahead of the curve of potential natural and manmade threats. By learning from the experience and institutional structures of other countries, an unused reservoir of emergency response expertise can be tapped into.