

Submission to: Independent Review of the Extreme Weather Event South Australia  
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Both authors were members of South Australia Police and involved in emergency management activities before the introduction of the Emergency Management Act 2004 and State Emergency Management Plan and then subsequently actively engaged in all aspects of the introduction and application of the Act and Plan through to their retirement in August 2015. Both were principle collaborators in the development and introduction of changes to emergency management policy such as the 10 responsibilities of the Control Agency, Traffic Management at Emergencies, Evacuation and State Emergency Centre & Zone Emergency Centre Operations Manuals. They have closely examined most inquiries/reports/reviews/debriefs on significant incidents across Australia on behalf of SAPOL and were key contributors to the development and introduction of Crisis Information Management System to the Police Operation Centre and State Emergency Centre environments. They also developed and facilitated a range of emergency management training and exercises. Dennis Mulroney was also recently engaged by the State Emergency Service to facilitate the multi-agency and State Emergency Centre debriefs for the extreme weather event, the subject of this submission.

This submission makes suggestions to improve the adequacy, content and structure of the State Emergency Management Plan (SEMP, December 2016 version) in relation to the State's prevention, preparedness, response and recovery arrangements (3<sup>rd</sup> objective of the Review) for it to meet the new requirements of the Emergency Management Act 2004. It also includes suggestions to improve the on-going maintenance of the SEMP and related plans, for audit and assurance arrangements, and multi-agency emergency management training.

The authors have not had the benefit of viewing the submission that would have been presented to the State Emergency Management Committee (SEMC) describing the reasons for the various changes to the SEMP at the time the plan was presented for adoption. The discussion and suggestions offered below are based on their work experience and knowledge of SA's legislative framework and emergency management arrangements.

Amendments to the Emergency Management Act 2004 brought about by the Emergency Management (Miscellaneous) Amendment Act 2016, has placed new requirements on the content of the SEMP. It must now contain vide Section 5A(1):

***'detail strategies for dealing with emergencies in the State, including strategies—***

- (a) for the prevention of emergencies; and*
- (b) relating to preparedness for emergencies; and*
- (c) for the containment of emergencies; and*
- (d) for the co-ordination of response and recovery operations; and*
- (e) for the orderly and efficient deployment of resources and services in connection with response and recovery operations.*

In addition, the SEMP must meet the Act's objectives and guiding principles - section 2(1):

- (a) *to establish an emergency management framework for the State that—*
  - (i) *promotes prompt and effective decision-making associated with emergencies; and*
  - (ii) *makes provision for comprehensive and integrated planning in relation to emergencies; and*
- (b) *to promote community resilience and reduce community vulnerability in the event of an emergency.*

The SEMP December 2016 update does not reflect the new requirements of the Act and is deficient in many respects including: content that does not align with the Act; lack of clear, specific and directive strategies; and conflicts in roles, terminology and definitions. Also, in some areas there has been fundamental changes to the emergency management arrangements some of which conflict with lessons learnt over the past decade.

The revised SEMP is comprised primarily of general statements. There is a significant risk to the State if agencies interpret the general statements in different ways. This risk is compounded by the current responsibility stated within the SEMP for each agency to independently manage emergency management training within their own organisations, rather than, work together to have a central provider delivering training in a multi-agency environment. Multi-agency training delivered at field and strategic management levels, provides a consistent understanding of the emergency management arrangements across all agencies and additionally, participants gain an understanding of other agencies capabilities and develop working relationship with persons they may encounter at emergencies.

SEMC requires a workable and effective SEMP that contains detailed requirements for the necessary structures, roles and responsibilities required to plan for, mitigate and manage emergencies when they occur. It is only through agencies applying the requirements of the SEMP that the Act's objects and guiding principles and, in particular, section 2(a)(i) *promotes prompt and effective decision making associated with emergencies* can be achieved.

The Emergency Management Act 2004 provides a common sense, practical and relatively simple approach to achieving the desired emergency management outcomes. However, how this is achieved is dependent upon the quality of the SEMP. For example, in relation to response operations, *Section 19-Coordinating Agency* and *Section 20-Control agency* affords an effective basis to achieve the objects of the Act by providing a simple mechanism to determine which agency is to be in-charge and responsible for the resolution of an emergency. These Sections removed a considerable amount of confusion that had often occurred at emergencies when trying to determine who is in-charge of response operations. This simplicity is relatively unique and rarely seen in emergency management legislation around the world.

This paper also includes suggestions as to the detailed strategies that need to be articulated comprehensively in the SEMP for it to meet the requirements of the Act. It also proposes a total restructure of the content of Part 2-Arrangements. The following is an outline of the issues the authors have identified within the SEMP.

## **PART ONE - OVERVIEW**

The 'Overview' does not follow a hierarchical and logical order and there are key players missing from the overview. For example, the topic 'Legislative and Administrative Framework' should logically go first. There is no mention that the Premier is responsible for the administration of the Act and is supported by a sub-committee of Cabinet, the Emergency Management Council. Also, while 'Zone Emergency Support Team' is mentioned, there is no mention of the most important persons for response operations – the Incident Controller and their strategic management level manager.

Additionally, the diagram representing an 'Overview of Arrangements' does not correctly reflect the arrangements as per the Act and the SEMP. It is also in conflict with the diagrams in Part 2, Figures 3A and 3B. The administrative arrangements for the SEMP are quite different and separate to the response and recovery arrangements. Two separate diagrams are required, one showing the Administrative and Planning Arrangements and the other Response and Recovery Arrangements.

There is no mention that a key part of the Act is having one agency overall responsible for response operations – the control agency, and all other person and agencies involved are subject to their control. Also, that the control agency has ten specific responsibilities they must address in resolving an emergency.

While there is a list of nominated control agencies for a range of emergency types, there is no mention of what happens for emergencies when there is no predetermined control agency, (for example, mining and industrial accidents, and widespread and extended outage of electricity, gas, water or sewage) and the responsibilities of the Coordinating Agency in determining the leadership agency when it is unclear as to who is in-charge.

**It is suggested** that a summary of the key response operational arrangements be included in this Part. A possible example is as follows:

*The key response operations arrangements described in the Act and this Plan are summarised as follows:*

- *The provision of the Act and this Plan in relation to an emergency apply at all times*
- *For every emergency there is to be a single control agency responsible for response operations including relief and recovery operation*
- *The nominated Control Agency for different types of emergencies are listed in the table at Part 3.19.2 of this Plan*
- *When it is unclear which agency is the Control Agency for an emergency the Coordinating Agency (South Australia Police) is required to make a determination as to which agency will be the control agency*

- *The Control Agency is required to address the ‘ten responsibilities of the control agency’*
- *The person designated by the control agency to lead field operations is to be known as the incident controller*
- *The incident controller is subject to the command of their manager or the designated state controller*
- *Other persons and agencies that attend an emergency (support agencies) are subject to the control (not command) of the control agency unless by formal agreement*
- *Support agencies are accountable for undertaking their legislative responsibilities or agreed tasks in support of the control agency*
- *Coordinating agency role is primarily an assurance one. It is required to ensure there is a control agency for every emergency and is undertaking the ten responsibilities of the control agency*
- *Upon a declaration of an identified major incident, major emergency or disaster the State Coordinator is responsible for the management and coordination of response and recovery operations, the latter in conjunction with an Assistant State Coordinator (Recovery)*
- *Upon a declaration the control agency remains responsible for resolving the emergency subject to directions, if any, of the State Coordinator or Assistant State Coordinator.*

## **PART TWO - ARRANGEMENTS**

The recent changes to the Act (requirements for detailed strategies; objectives and guiding principles) mean that this Part of the SEMP must be more prescriptive and dictate what must be in place, not just provide general statements about what already exists.

### **State Emergency Centre (SEC) Arrangements**

The concept of the SEC was developed following the devastating 1980 Ash Wednesday Bushfire. This was South Australia’s first major bushfire/disaster for many years and the first since significant advances in communications capabilities. At the time, there were limited arrangements in place to allow agency leaders and government to collaborate to support the resolution of a significant emergency and provide relief and recovery efforts to affected communities. It led to the development of the State Disaster Act 1980 and a State Disaster Plan that was based around the operations of a SEC.

SEC support to the State’s emergency management arrangements is restricted by the physical environment in that it can only house a limited number of players. Thus the creation of the Functional Services ‘communication trees’ of liaising with like/related parties.

One of the roles of the SEC is to be able to quickly communicate and with the right person/s from over 120 agencies that can be involved in the resolutions of a significant emergency or can provide advice or expert opinion. It is not physically possible or practical for all these organisations to be represented in the SEC.

That is why Functional Services were originally created with a lead agency given responsibility for organising the arrangements with their Participating Agencies. It appears this capability has not been maintained across all areas.

The SEMP has made changes to the functionality and naming conventions of the State Emergency Centre (SEC) that are confusing and likely to significantly reduce effectiveness.

The SEMP (at 3.20 and 3.23), in moving away from the single concept of Functional Services to having a combination of Support Agencies and Functional Support Groups within the SEC arrangements creates significant naming convention issues throughout the plan. One example is the confusion created by failing to clearly differentiate the role of a support agency supporting the Control Agency to that of an agency managing a Functional Support Group.

The concept of an agency or person performing two or more roles is common. For example, St John Ambulance has the following roles:

- Support Agency for emergencies they are called upon to attend and undertake specific tasks
- Participating Agency as part of Ambulance and First Aid Functional Service where they provide advice on their resource capability and availability, call-out their resources when called upon or provide other information and advice when requested.

SAPOL has the following roles:

- Coordinating Agency for all emergencies
- Control Agency for a range of emergency types
- Support Agency for all other emergencies
- Participating Agency and lead agency for three Functional Services – Communications, Police and Public Information.

An agency keeping these roles separated assists in ensuring all aspects of the various roles are undertaken and reduces misunderstandings.

**It is suggested** the new concept of having a combination of Support Agencies and Functional Support Groups within the SEC be cancelled and only Functional Support Groups be retained.

The SEMP describes the 'Role of Functional Support Groups' (at 3.2) when it is actually describing the role and responsibilities of the lead agency of a Functional Support Group. This needs to be amended to ensure clarity.

The authors suggest that Functional Support Groups do not exist outside of the SEC environment contrary to the thoughts of others. In over ten years of examining Zone Emergency Centres (now to be known as Zone Emergency Support Teams-ZEST) operations we have not experienced an occasion where an agency acts as a lead agency of a Functional Support Group. Instead Participating Agencies of Functional Support Groups deal directly with the Zone on a needs basis as a supporting agency.

**It is suggested** that the SEMP states clearly that Functional Support Groups do not exist outside of the SEC environment. This would assist in simplifying the emergency management arrangements.

The SEMP has removed the previous (and limited) role statement of the SEC and replaced it with a summary of 'functions' that is different and less comprehensive than the *Key Principles and Limitations* contained in the SEC Operations Manual. In 2014 after extensive discussions, lessons gained through activations of the SEC for emergencies and exercises, and gaining an understanding of what should be the role of the SEC, changes were made in the operations of the centre and the contents of the SEC Operations Manual. This included a revised role statement.

An example of the issues created by the change in expression from 'role' to 'function' is the inclusion in this version of the SEMP of an SEC function to: *"exercise the powers and functions of the State Coordinator in a declared emergency"*. No person or body can exercise the powers and functions of the State Coordinator unless there has been a delegation made under Section 18 of the EM Act (i.e. specifically to the SEC). If it was intended that the SEC exercise these powers and functions then the Plan should detail the existence, and limitations, of the delegation made by the State Coordinator so that they can be incorporated into the SEC Operations Manual.

**It is suggested** that the role statement contained in the SEC Operations Manual (see below) replaces the one in the SEMP (at 3.7).

*The SEC supports the State Coordinator by bringing together agencies and persons to engage in operations within the SEC which may include:*

- *Control Agency*
- *Functional Support Groups*
- *Recovery representatives*
- *Subject experts (e.g. Bureau of Meteorology)*
- *Other relevant organisations and interested parties.*

*The role of the State Emergency Centre (SEC) is to:*

- *Support the State Coordinator in the execution of his/her responsibilities for managing and coordinating response and recovery operations in accordance with the Emergency Management Act 2004 and SEMP and;*
- *Support agencies engaged in response and recovery operations that are beyond the capability of day-to-day resources.*

*The SEC supports this role by engaging participating agencies in the following activities:*

- *Coordinating the analysis and sharing of information about an emergency or potentially disastrous situation with the State Coordinator, Control Agency, Functional Support Groups, support agencies and the State Recovery Office*
- *Coordinating and prioritising the allocation of State resources to support agency response and recovery planning and/or operations*
- *Facilitating collaborations between the State Coordinator and Chief Executives of government departments and other agencies*
- *Coordinating liaison with the State Government and with Australian Government emergency management authorities*
- *Supporting the State Coordinator in the preparation of any requests for Australian Government assistance, declarations, appointments or delegations as required*
- *Supporting the formal transition from response activities to recovery operations.”*

**It is suggested** that it is more appropriate for the SEC role statement to be contained in the SEMP, and repeated in the Manual, rather than the other way round, as it provides the high level strategic direction and guidance for SEC operations and the Manual’s content and development.

The SEMP (at 3.8 and 3.9) describes two centres - State Control Centre (Control or Supporting Agency) and State Command Centre (Functional Support Group) as part of the SEC arrangements. These titles are no longer required as they are the State Command Centre of the respective agencies. In any case to use of the terms ‘control’ and ‘command’ in these titles is inappropriate as lead agencies of Functional Support Groups collaborate with their Participating Agencies, they do not have command or control authority over them.

**It is suggested** that the titles - State Control Centre (Control or Supporting Agency) and State Command Centre (Functional Support Group) be deleted from the SEMP and just the term ‘State Command Centre’ used.

The position of SEC Coordinator does not need to be described in the SEMP (at 3.17) as it is not a position identified in the Emergency Management Act 2004 or one having particular authorities. SEC Coordinators are Officers of Police allocated responsibility for the role by the Deputy Commissioner of Police under SAPOL plans and, their roles and responsibilities are comprehensively described in the SEC Operations Manual. It is just one of a number of positions created under the Manual to ensure effective operations of the SEC. The removal of the position from the SEMP will have no impact on the overall arrangements.

**It is suggested** that the position of SEC Coordinator be removed from the SEMP.

Further to the responsibility statement for the SEC Coordinator in the SEMP - it copies a recent amendment to the SEC Operations Manual which changed from "*The responsibilities of the SEC Coordinator include the following: ...*" (followed by 3 dot points) to "*The position of SEC Coordinator represents the State Coordinator in their absence. The State Coordinator, when present, will lead the operations of the SEC. The Responsibilities of the SEC Coordinator (in the absence of the State Coordinator) include...*" (followed by the same three dot points). Some, but not all, other references to SEC Coordinator later in the document e.g. in the Operations section now refers to the 'absence' of the State Coordinator'.

The change that makes the State Coordinator responsible for 'leading' the SEC is considered significant. The authors suggest that taking direct leadership responsibility for the centre is contrary to the principles of strategic command, places a number of additional complex demands on the State Coordinator that should be delegated to the SEC Coordinator so that they remain free for the strategic thinking, high level briefings and discussions that must take place when managing responsibilities at that level. The State Coordinator, due to their day to day responsibilities, would have limited opportunities for training and exercising in the SEC, acquire a comprehensive grasp of the operations of the centre, nor the time to exercise them properly. Some issues discussed at the SEC debrief conducted on 16 November demonstrated how a lack of knowledge or adherence to plans can affect the operations of the centre.

The SEC infrastructure provides two distinct parts to provide effective support to agency operations. One is the Functional Support Groups room where representatives share information and problem solve at a strategic operational level. The second is a 'coordination' area consisting of a conference room and private office for the State Coordinator's use to fulfill their executive level strategic responsibilities e.g. Government and State level problem solving.

The State Coordinator is responsible for choosing which level (i.e. general operational or strategic) should be activated and should remain free of direct involvement in the operational level to be able to fulfill the executive level responsibilities when required.

**It is suggested** that any SEMP provisions regarding the SEC should provide a clear statement ensuring that the State Coordinator role does not include a responsibility for 'leading' the SEC.

As most nominated Control Agencies are also lead agencies of a Functional Support Groups it is important that during activations of the SEC they keep the two roles separate, as far as practicable, to ensure the sharing of information and collaboration with their Participating Agencies occurs. This is achieved by reporting and providing briefings separately as the Control Agency and for the Functional Support Group. The separation of responsibilities, and the awareness of others, would be significantly enhanced if the Control Agency was given a booth or office in the SEC that was separate to their Functional booth.

If there are no or minimal differences in the two roles it becomes questionable if the Functional Support Group is still relevant. The authors are not aware of a comprehensive review been undertaken of responsibilities and composition of each Functional Support Groups. For example, should the SES Functional Support Group become the Rescue Functional Support Group and their Participating Agencies include links with private sector rescue agencies particularly those involved in the mining sector. Likewise, should the Police Functional Support Group become the Policing and Investigations Functional Support Group and their Participating Agencies include the various investigation arms of Federal and State Governments, statutory bodies with an investigation arm and subject experts across a wide range of disciplines.

On the other hand, the Logistics Functional Support Group responsibilities, as described in the SEMP, indicate that its capability has been reduced essentially to catering issues. Logistics is no longer about the distribution of Government supplies, as they no longer exist. What agencies require is assistance with procurement of resources beyond day-to-day supplies during emergencies. The authors suggest the most appropriate lead agency would be the component of State Government responsible for the contracting or procurement of resources and supplies to the State Government. It is suggested this group be re-organised to become the Procurement Functional Support Group and have as its Participating Agencies the various procurement units of the State Government.

It is noted that 'Mapping' has been added as a Functional Support Group. It is disappointing that its responsibilities are limited to providing support only to 'public information' and there is only one state government department that is a Participating Agency. This is strange as spatial information can support the information needs of many aspects of the resolution of an emergency. State and local government have extensive resources in this field and it is an area that the private sector, with its extensive resources, is likely to volunteer to assist extensively.

**It is suggested** that a comprehensive review be undertaken of the types of Functional Support Groups required to support the State Coordinator and the broader emergency management arrangements together with the responsibilities and composition of the agencies involved.

### **Control Agency**

The SEMP contains following three paragraphs under the Control Agency heading (at 3.19):

*If two agencies are jointly responding to an incident through agency based mutual aid arrangements, the State Coordinator is able to consult with either or both agencies in seeking information upon which to base decisions.*

*During an emergency that involves mutual aid/joint response arrangements by the Country Fire Service (CFS), Metropolitan Fire Service (MFS) and/or State Emergency Service (SES), the State Coordinator may utilise the authority given in section 20(1)(b) of the Act to determine the control agency for the purposes of seeking advice, prior to making a declaration.*

*The MFS/CFS Joint Principles of Incident Management will be used to assist with those agencies providing advice to the State Coordinator.*

The above statements contain an element that is technically incorrect at law. Section 20 relates to the 'Coordinating Agency' and not the 'State Coordinator'. They are different entities although the Commissioner of Police could make this decision as the Coordinating Agency if ever in that position. In practice, if a decision is required as to who is the control agency for an emergency it would be a field decision made by the senior police officer present who would be unlikely have access to or knowledge of the document.

Their determination would be based upon which agency present at the emergency is best placed to undertake the role of control agency. Hopefully, CFS & MFS leaders present would be able to work it out without the need to refer a decision to the Coordinating Agency. Therefore, the authors question the need for these statements to remain in the SEMP.

**It is recommended** that the above three paragraphs be removed from the SEMP. If this information must be known by the Coordinating Agency, then it belongs in a Practice Guide to support training and not in the SEMP.

The next paragraph (see below) is also not appropriate.

*Where multiple agencies are attending an emergency, the use of incident management sectorisation will enable those agencies with the appropriate skills to take charge of operations within their area of expertise. These areas include inland water oil spills and the rescue of persons trapped within accident scenes whereby the control agency will maintain overall control, but the specialist support agency will ensure the appropriate response within their area of expertise.*

The outcome is not achieved by just 'sectorisation' but by appropriate 'delegation' by the Incident Controller. This aspect is discussed below in the 'Incident Management' section.

**It is suggested** the above paragraph be removed from the SEMP.

**It is suggested** that the SEMP glossary definition of 'Sectorisation' also be removed. It has the potential to create further confusion with its references to a 'division', something not articulated anywhere else in the plans.

This section also requires statements like the following:

*The responsibilities of the control agency apply at field and strategic management levels. The successful resolution of an emergency requires all ten responsibilities to be considered and addressed appropriately. At any point of time the individual responsibilities may vary in priority, relevance and the resources allocated to them and, this may also vary between management levels.*

*The nominated Control Agencies are required to develop internal policies and incident management arrangements that allow the agency to effectively command or manage its own personnel and resources involved in the resolution of an emergency, as well as controlling the Support Agencies involved.*

*Upon a declaration of an identified major incident, major emergency or disaster the Control Agency remains responsible for resolving the emergency subject to directions, if any, of the State Coordinator or an Assistant State Coordinator.*

*The Control Agency is responsible for recovery operations unless the executive officer (or their delegate) of another agency has formally agreed to accept that responsibility or in the case of a declared emergency, an Assistant State Coordinator (Recovery) has been appointed and has formally agreed to accept that responsibility.*

## **Support Agency**

The SEMP (at 3.20) had not previously defined the responsibilities of Support Agencies. However, those described in the Plan are more aligned to the responsibilities of a lead agency of a Functional Support Group than to a Support Agency assisting the Control Agency.

This section would require statements, amongst others, like the following:

- *Support the control agency*
- *Follow reasonable directions of the control agency*
- *Command their own resources unless otherwise agreed*
- *Regularly report to the control agency.*

**It is suggested** the responsibilities of Support Agency be re-defined.

## **COORDINATING AGENCY**

The SEMP (at 3.21) does not accurately reflect the legislative requirements of Section 19 and 20 of the Act. Also, the additional coordination requirements placed upon the Coordinating Agency by the SEMC following the lessons gained from the 2009 Victorian Black Saturday Bushfires Royal Commission need to be clearly delineated from the Act requirements to improve training and understanding.

**It is suggested** the current information be replaced with the following:

*'The Coordinating Agency has the following functions in relation to an emergency (refer s19 & s20(1)(b) of the Act):*

- *When it is unclear as to which agency at an emergency should be in control, make a determination*
- *Consult with the control agency*
- *Take action to facilitate the exercise by the control agency of functions or powers in relation to the emergency*
- *Determine whether other agencies should be notified of the emergency or called to the scene of the emergency or otherwise asked to take action in relation to the emergency*

- *To advise the State Coordinator in accordance with any requirements of the State Coordinator’.*

*The Coordinating Agency has been assigned additional functions by SEMC. They are to actively seek information from the Control Agency and Supporting Agencies to ensure that the Control Agency is meeting its ten responsibilities as described in this Plan. This includes ensuring:*

- *That effective command and control arrangements are in place and clear*
- *That the threat is clearly understood and being actioned accordingly*
- *There are incident management objectives and priorities*
- *Agencies are working together in a collaborative manner*
- *That public warnings are actually disseminated and appropriate (this is a Control Agency responsibility but the Coordination Agency is required to check this is occurring).*

*Coordinating Agency responsibilities are undertaken irrespective of any declaration that may be made by the State Coordinator or Governor and are in addition to any Control Agency or Support Agency responsibilities undertaken in relation to an emergency by that agency.*

*Coordinating Agency responsibilities apply at field and strategic management levels. The manner in which the Coordinating Agency links with the leadership of the Control Agency and Supporting Agencies prior to and following the declaration of an identified major incident, major emergency or disaster is illustrated in Figures 3A and 3B. (Note: SAPOL is on both sides of the diagram – always as the Coordinating Agency and either a Control Agency or Support Agency depending on the type of emergency.)*

*The Coordinating Agency role is essentially an assurance role and different and separate to the coordination of resources which is primarily the responsibility of the Control Agency.*

Figures 3A and 3B are technically not correct when including the various centres into the diagrams as not all centres are included, for example, the SEC; Agency State and Regional Commanders do not necessarily have to be in their respective command centres for coordination to occur and ZEST support can occur at both Zone and field levels. Coordination responsibilities can be achieved through electronic conferencing conducted anywhere. The purpose of the diagrams is to show the leadership arrangements and links and this is more clearly displayed if no centres are included.

**It is suggested** Figures 3A and 3B are amended by the deletion of State Command Centres, Regional Command Centres, Zest Support and IMT.

## **Local Police Coordination**

The content in this section is not required as the role and responsibilities listed are the same responsibilities the local police commander or nominee has within their Coordinating Agency role but stated in a slightly different manner. Their removal will have no impact on the State's emergency management arrangements and will reduce confusion within policing and simplify training.

What this section needs to state are the additional responsibilities SEMC through the SEMP wishes to place upon the local police commander that do not already exist as part of their Coordinating Agency's responsibilities. In determining the additional responsibilities, it is essential they do not conflict with the requirements of Section 20(3).

That is when police are a Support Agency they, including the local police commander, are subject to the control of the Control Agency. The local police commander's emergency management activities must be at the direct request of the Control Agency. They cannot act independently of them otherwise they usurp the authority of the Control Agency and can cause control confusion. (Note: a related discussion regarding ZEST on page 22)

The SEMP must clearly identify that the coordination of resources is the responsibility of the Control Agency and they can request any agency, including the local police commander, to support them in this role and is achieved by making specific requests.

**It is suggested** that the content under the heading of 'local police coordination' be deleted.

It is also suggested that further discussions should occur to determine what would be the additional responsibilities, if any, of the local police commander outside of their role as part of the Coordinating Agency before anything is included in the Plan.

## **Incident Management (at 3.24)**

This is the first time the specific topic of incident management has been included in the SEMP and needs to be commended. However, what has been included lacks detail and substance. To ensure that agencies can work together effectively and efficiently, the SEMP must describe a common incident management framework that sets minimum standards for incident management irrespective of the industry incident management model an agency employs. The aim is to have everyone behaving and thinking in a similar manner during response operations at all management levels irrespective of the role they are undertaking.

The introduction paragraph suggests that all agencies must adopt a sophisticated incident management system. This is mainly applicable to nominated control agencies.

**It is suggested** that the introduction is amended to reflect the following:

*Effective working relationships between the nominated control agency and supporting agencies at an emergency is critical. Agencies involved in response operations for the resolution of an emergency are expected to employ incident management arrangements to manage their own people and resources.*

*Nominated control agencies are required to employ a sophisticated incident management system that provides not only a means to manage their own people and resources but also to control other agencies that provide support at field, regional/zone (if applicable) and state management levels.*

*It does not matter which incident management model a nominated control agency employs, for example, AIIMS, ICCS Plus or Gold/Silver/Bronze. However, they are required to adjust or expand the particular industry model to meet the legislative and administrative framework of South Australia including the specific requirements of the SEMP.*

*Individual agencies are responsible for the management/command of their own people and resources. A control agency does not command the members of a support agency unless by formal agreement (for example, a multi-agency Urban Search and Rescue team). A control agency controls a support agency by delegating tasks to that agency via its leader. How that task is achieved is up to that agency.*

Nominated control agencies cannot solely rely on their industry incident management system as their incident management model. These models are prepared in a generic manner for broad use. Individual agencies need to amend them to meet the specific requirements of their jurisdiction. For example, SAPOL employs the police ICCS Plus model. However, it was required to make a number of amendments and expansions to this model so it would be relevant to South Australia's legislative framework which includes the requirements of EM Act and the SEMP. These changes are reflected in SAPOL's ICCS General Order and ICCS Practice Guide.

The various industry incident management systems apply principles of incident management or principles of command of control in their operations. They form the basis of performance standards expected of people and agencies, however there are differences between systems. It is appropriate for the SEMP to identify the key principles they expect nominated control agencies to apply.

**It is suggested** that the following be incorporated into the SEMP as the essential principles of command and control which agency incident management models must adopt to achieve a common methodology of incident management across agencies.

- Appropriate leadership – there are clear arrangements to ensure leaders with the appropriate authority and capability take charge at all management level in-line with the complexity and risks of the emergency.

- Take charge – about actively taking responsibility, exercising initiative and applying leadership. It includes being proactive and responsive to changing or developing circumstances.
- Safety – operational safety is to be applied at all times. Acting safely involves the continuous assessment and control of risk as circumstances change.
- Functional management – involves managing multiple responsibilities, tasks or resources by grouping them into manageable, related activity type. (Nominated control agencies have agreed to align functional management with the ten responsibilities of the control agency as described in the SEMP.)
- Delegation – is normally necessary to achieve resolution of an emergency. Responsibility for undertaking a task can be delegated but not the accountability for it being carried out.
- Span of control or management – relates to the number of groups, individuals or tasks that can be successfully managed by one person and operates as a way to avoid overwhelming any one individual with too much responsibility.
- Collaboration – consulting with others and joint problem solving is normally superior to individual efforts and the soliciting of experience, knowledge, ideas and opinions of others support improved outcomes, including unity of effort and team work.
- Decision making – in responding to an emergency decisions need to be timely and based on an appreciation of the circumstances. Decisions are often required to be made in an environment of pressure and uncertainty, lack of information and before comprehensive awareness can be achieved.
- Incident action plan – the resolution of an emergency requires a defined plan that clearly states the mission and describes the strategies and tactics to be employed. The plan needs to be concise and clear to facilitate its implementation.
- Priority of action – activities need to be undertaken in order of priority and monitored. As circumstances change, the order of activities needs to be re-assessed and where necessary, amended.
- Flexibility- involves being responsive to changes that occur during the evolution of an emergency. It requires awareness and foresight so as to be sufficiently agile and flexible to changing situations, needs, priorities and opportunities.
- Unity of Command – a hierarchy where a person receives orders and reports to the one person – their direct leader. Dual command is a perpetual source of conflict.
- Communications – all communications during an emergency should be clear, succinct and timely and as far as possible in plain language.

- Strategic oversight – involves commanders ensuring they are not constantly engaged in the detail of activities being managed under their leadership by regularly taking time out to reflect on their decisions, observe the conduct and tempo of operations and, think through key issues to maintain a strategic level of focus on their overall responsibilities.
- Continuation of mission – unless there is a change in circumstances which requires an alteration to the incident action plan, the objectives, strategies and directions of the strategic controller and incident controller are to remain when a changeover (such as a shift change) occurs.

These principles are not limited to key position holders but need to be continuously considered by leaders at every level during response operations. For example, someone managing a group is a leader who has to consider these principles and apply them to their situation. It applies equally to an individual who has been delegated a task.

The field and strategic command structures within an agency are absent or not clear in some industry incident management systems. It is therefore appropriate for the SEMP to define minimum expectations. For example, the SEMP identifies that the resolution of emergencies may involve three distinct levels of management – field management; strategic management at regional/zone, state and chief executive levels; and executive management as depicted in Figures 3A and 3B of the SEMP.

The authors provide the following as an outline of some of the issues that would need to be addressed to standardise arrangements.

#### *Appointment of field leader*

The Act requires an agency to be in control of the resolution of an emergency at all times (the Control Agency), and also provides rules as to how agency leadership is to occur if the nominated control agency is not present. The Act and SEMP does not describe how an agency will appoint the incident controller or other field leaders to represent them – each agency is required to develop their own policies.

As successful resolution of emergencies is intrinsically linked to field leadership, it is essential that an agency's policies describe the appointment process from the time of first arrival plus an assurance process. There can be no delay in the appointment of the field leader.

As the initial response leaders to an emergency are generally low in experience as well as position/rank within their agency, an agency's policy would need to include the requirement for the field leader to assess the scale and complexity of the incident and their ability to effectively manage the situation, and if necessary, arrange for a more suitable person to assume that role. Also, if there is no strategic leader in place and the field leader believes there would be benefits in having strategic management support, it is appropriate for them to request their manager or other suitable person to nominate as the strategic leader and provide that support.

### *Role of field leader*

The field leader is accountable and responsible for management of their agency's resources involved in resolution of the emergency in the field.

If the emergency involves a multi-agency response and the organisation is the Control Agency, the field leader is also the incident controller and responsibilities include the control and coordination of the support agencies involved in the field operations. They are also accountable and responsible for ensuring that the responsibilities of the Control Agency, as per the SEMP, are undertaken as they relate to field operations. These responsibilities are in addition to those contained within the industry incident management model adopted by their agency.

The field leader of a support agency is also accountable and responsible for ensuring the responsibilities of the control agency, as applicable to the context of being a support agency, are undertaken as they relate to field operations.

If the field leader is also the Incident Controller, they are subject to audit by the police forward commander who has a legislative coordination responsibilities that basically relate to ensuring that the incident controller is adequately addressing the responsibilities of the control agency.

Agency's policies would need to articulate that the incident controller is responsible for regularly bringing together the field leaders of the support agencies for the purpose of:

- Providing briefings on the current and likely future situation
- Reporting on the status of activities being undertaken
- Collaborating on the appreciation process and development of a joint incident action plan
- Delegating tasks
- Sharing relevant information.

The frequency of liaison would depend on the size and complexity of the situation. To support effective liaison, where practicable, the co-locate of the various agency leaders and their support resources is to be encouraged.

Policies would also need to be clear that the field leader, after undertaking an initial assessment, must establish and remain at the nominated command location to enable ongoing liaison to occur.

### *Role of strategic leader*

Depending on the complexity and risks associated with an emergency, the position of strategic leader (to whom the field leader reports) may need to be established. The strategic leader becomes accountable and responsible for the overall strategic command, control and coordination of the emergency and is accountable for its outcomes.

Due to the incident despatch arrangements of agencies, the supervisor/manager of the field leader is often not aware of the occurrence of an emergency and there needs to be clear policies as to how and when they are advised of an emergency. Once advised, the supervisor/manager becomes the strategic leader of the emergency until it is resolved or the responsibility is transferred to another person.

The responsibilities of the strategic leader are to provide guidance, support and if necessary, direction to the field leader and includes the approval of their plan/s, assessment of the field leader's performance and the taking of corrective action. Activities would include the following:

- Providing strategic directions and guidance in the development of plans, the setting of limitations and field plan approval
- Advising the field leader of surrounding events and issues that may impact upon the development of plans
- Not getting involved in field operational and tactical issues – how the plan is executed is the responsibility of the field leader
- When necessary, building a strategic management level support team to undertake tasks that can be performed away from the field, for example, organising the attendance of specialist personnel or other resources, organising the personnel for a change of shift or undertaking particular public information activities
- Regularly communicating with their field leader and reviewing available information to assess the performance of the field leader in relation to their application of the principles of command and control (see above) and the addressing of the ten responsibilities of the control agency as it applies to their organisation, and taking corrective action
- Assessing the scale and complexity of the incident and the ability of the field leader to effectively manage the situation, and if necessary, undertake the field leader role or arrange a suitable person to assume the role.

The appointment of a strategic leader and any change of field leader, if occurs, must be immediately communicated to the key people involved and recorded. If the strategic leader becomes the field leader, they must immediately arrange for a more senior person to undertake the role of strategic leader.

When the emergency involves a multi-agency response and the organisation is the control agency, the responsibility of the strategic leader extends to the strategic control and coordination of support agencies at the strategic management level.

There is a perception in the emergency management community that according to AIIMS the incident controller is in overall control and is subject to only limited strategic management level supervision and direction. This is based on the following within AIIMS that states the incident controller is: *“overall responsibility for the management of all activities undertaken to control the incident”*. This statement relates to field management and the role of the strategic leader as described above supports this position. There are legislative responsibilities upon chief executives and chief officers of government agencies to supervise when they delegate responsibilities, for example, the responsibilities attached to incident controller or field leader role.

### *Strategic leader command and control centre*

For many less significant emergencies a strategic leader may only need to provide guidance and limited directions to the field leader. In these circumstances conversations by means of radio or mobile phone may suffice. However, for complex emergencies the strategic leader may need to build a strategic management level command and control structure for purposes including:

- Discharging their responsibility of providing direction, guidance and support to their field leader(s)
- Undertaking tasks requested by their field leader(s)
- Liaising with equivalent strategic commanders of the other agencies involved
- Reporting to chief executive or chief officer and if operating, the State Emergency Centre.

Also, when two or more significant emergencies occur simultaneously the workload at the strategic management level can increase immensely. Not only is there a requirement to spread scarce resources over more than one incident but maintaining appropriate information management and sharing arrangements between various leaders is critical. The situation may activate the State level emergency management arrangements that add an additional level of complexity. There is also the issue of maintaining normal day-to-day business.

An agency would require policies and procedures for strategic management level command and control centre/s (ie: centre operations manual) that includes how the centre is activated, its operations, information management and sharing arrangements, and describes the role and responsibilities of key centre personnel. There would also need to be a regular testing and evaluation protocols.

### *Leadership for multiple emergencies*

An agency needs to plan for multi emergencies and have clear policies as to the leadership arrangements for different combinations of concurrent significant emergencies: The following provides an example:

- When two or more significant emergencies occur within the same region, a field leader be assigned to each incident and the region manager (or nominee) becomes the (region) strategic leader operating from a regional centre.
- When single significant emergencies occur within multiple regions, the field leader is to be the region manager (or other nominee) and the (state) strategic leader to be a senior manager of the agency operating from a state centre.
- When multiple emergencies occur within multiple regions, a field leader to be assigned to each incident and the region managers (or other nominees) to be the region strategic leader reporting to the state strategic leader.

- When the same significant emergency occurs or crosses two or more regional boundaries the state strategic commander to determine who would be the field leader or how field leadership would be divided.

### *Multi-agency command and control arrangements*

Multi-agency command and control arrangements can vary depending upon the type of emergency and the resources involved. Normally, agencies operate as independent units being responsible for the command/management of their own personnel and other resources. The focus of their activities is controlled by the control agency.

On occasions agencies may come together and form a single command and control structure, for example, some search and rescue operations. In these cases, the field personnel forgo their agency's command arrangements and operate as a joint team under the command of the incident controller.

At other times a combination of the two types of multi-agency arrangements can also occur. For example, fire and rescue agencies may agree to work jointly together as a single team while other agencies like police and ambulance services operate as independent units.

The SEMP should describe the different types of multi-agency command and control structures that may be employed and in what circumstances they are used and if conflicts occur, a resolution process.

### *Other Issues*

**It is suggested** the SEMP also needs to incorporate more detail to ensure a consistent response when considering other issues such as the following:

- Standards for delegating tasks to a support agency and reporting back arrangements
- Define an Incident Management Team (IMT) and its composition
- Considerations for selecting a venue for a field command and control centre
- Support agencies communication linkage to the Incident Controller and IMT
- Management of an Incident Controller by the Control Agency's State and/or Regional Controller
- Arrangements for dealing with 2 or more geographically separated significant emergencies within the one Zone
- Arrangements for dealing with an emergency involving 2 or more Zones.

### **Zone Emergency Support Team (ZEST) Arrangements (3.10)**

The authors noted the Plan has changed the title of Zone Emergency Centre (ZEC) to ZEST and made some insignificant changes to its role statement. In June 2009 the ZEC role statement was significantly changed from its original one in an attempt to overcome the significant problem of ZECs undermining the role and responsibilities of the Control Agency in an emergency.

Although the ZEC Operations Manual template was updated at the time to align with the revised role of ZECs and various training undertaken, there continued to be misunderstandings and conflicts between ZECs and the Control Agency including the following:

- ZECs activated without a request or knowledge of the Control Agency
- ZECs undertaking activities not assigned to it by the Control Agency
- Inability of Support Agencies and Control Agency to provide ZECs with appropriate level of representation that can speak for and on behalf of their organisation
- Agency representation in ZECs is not consistent across Zones
- Continued perception that ZECs can act independent and/or superior to the Control Agency
- Police strategic level commanders using ZECs as a source of incident situation information, independent of the Control Agency.

The minimal changes made to the role statement are deemed unlikely to have sufficient impact to change or eliminate these issues.

Within policing the activities of ZEC's has been seen as necessary and successful however Emergency Services have been less inclined to support them. Police commanders at field and strategic level are highly motivated to actively coordinate and resolve emergencies. This motivation is derived from the Police Act 1998, Section 5—Purpose of police which contains the following:

- *(d) assist the public in emergency situations; and*
- *(e) co-ordinate and manage responses to emergencies; and*

Failing to fully recognise the primacy of the Emergency Management Act 2004, and therefore the responsibilities of the Control Agency, police commanders have often overstepped their coordination role and ended up trying to conduct operations, parallel to or independently of the Control Agency.

The Act has specifically given the Control Agency the overall responsibility to collaborate with Support Agencies and control response operations in their entirety. The establishment of a ZEC has tended to undermine the authority of the Control Agency.

Close engagement in the training, exercising and reviewing of ZEC's has led the authors to question the relevance or need for ZESTs. The following discussion has been provided to support that view.

Prior to the introduction of the Emergency Management Act 2004 there were no specific laws governing multi-agency control or coordination arrangements at emergencies that were not a declared disaster. This included the operations of Divisional Emergency Operations Centres (re-named Zone Emergency Centres). The State Disaster Act 1980 made no reference to these Centres and the State Disaster Plan briefly mentioned that they were part of the State's arrangements but provided no guidance as to their function or operations.

The then Police Functional Service Plan stated that to facilitate effective control and coordination at emergencies that ZECs are to replicate the State Emergency Centre (SEC) arrangements that were based around Functional Services but at a Zone level. The Divisional Coordinator (re-named Zone Coordinator) was to operate from the ZEC and the agencies involved in resolving the emergency were subject to their control. This arrangement was only supported by legislation during a declaration as this was the only time the State Disaster Act 1980 and State Disaster Plan had legal affect. ZECs were often activated for non-declared emergencies and attempted to undertake a control and coordination role.

The introduction of the Emergency Management Act 2004 significantly changed the emergency management legislative framework in South Australia. Amongst other things, it introduced the concept of a Control Agency and gave them overall responsible for the resolution of an emergency. The Act states:

*'all other persons and agencies involved in response operations in relation to an emergency are, in carrying out those operations, subject to the control of the control agency'* (refer to Section 19(3) of the Act).

The legislative change meant that the original role of ZECs and its management by Zone Coordinators under the State Disaster Act 1980 was no longer applicable under the new Act.

The failure to recognise the full implications of the change in emergency management arrangements, due to the new Act and Plan, has meant that an inappropriate model was adapted for use under the new arrangements and it is now clear that it is no longer required or desirable. (Note: a related discussion regarding the position of Local Police Coordinator on page 13)

The Control Agency and/or the Coordinating Agency can at any time bring together or communicate with the local or regional leaders of the support agencies involved in an emergency (including local government representation) and this does not require the activation of a ZEC.

As per our comments on the role of the field leader above (page 16):

*"The incident controller is responsible for regularly bringing together the field leaders of the support agencies for the purpose of:*

- *Providing briefings on the current and likely future situation*
- *Reporting on the status of activities being undertaken*
- *Collaborating on the appreciation process and development of a joint incident action plan*
- *Delegating tasks*
- *Sharing relevant information."*

This '*regularly bringing together*' (meetings) can be conducted in person, by teleconference or a combination of both, when necessary, to collaborate on defined and particular issues. This could include when notified of a potential emergency to ensure all agencies are aware of the situation and are prepared. However, during response and relief operations it is to come together for a meeting with a defined agenda and then return to their duties.

The Plan must ensure that Control Agencies address this responsibility properly as it is a methodology that will ensure a more effective and efficient coordination of local resources than having a 'satellite' group to support with resources and information.

It is reasonable to assume that continuing with a ZEST or ZEC type model of semi-independent coordination of resources will continue to cause control conflict and undermine the activities of the Control Agency.

During the 2015 Sampson Flat bushfire that was declared a major emergency, Support Agencies (including local government representatives), were engaged with the Control Agency at the One Tree Hill incident management team (IMT) location or were in contact with the CFS Regional office. There was no request for the activation of a ZEC.

Feedback from CFS Regional Managers advises that ZECs have worked for significant bushfires when they are co-located with the IMT. In these circumstances, it is not technically operating as a ZEC but the expected direct collaboration of the Control Agency with Support Agencies.

Traditionally ZECs have been seen as a means of engaging with local government during the resolution of emergencies. However, not all Councils are represented in ZECs and it has generally been an ineffective method of engaging with them.

In recent years, the Councils in which an emergency has occurred have liaised directly with the Control Agency. The 2014 Eden Valley and 2015 Sampson Flat bushfires are recent examples of successful collaboration between local government and the Control Agency without the use of ZEC arrangements. This is the appropriate arrangement and needs to be encouraged as standard practice.

The need for ZECs/ZEST to continue as part of the State's emergency management arrangements has been replaced by other arrangements that align with the responsibilities of the Control Agency and the Act.

**It is suggested** that ZEST are deleted from the State's Emergency Management Arrangement as they were formed under another legislative framework and are no longer relevant or appropriate under the current legislation.

The collaboration of regional/Zone management level leaders prior to and during significant emergencies that require a multi-agency response is an essential activity. The Control Agency is responsible for its organisation and the Coordinating Agency for ensuring it occurs. It does not require a ZEST for this activity to occur.

The deletion of ZEST will not impact upon multi-agency arrangements as the 'responsibilities of the Control Agency' (refer SEMP Part 2 paragraph 3.19.3) places specific obligations upon the Control Agency to collaborate with Support Agencies.

## **Other deficiencies of the SEMP**

The following are just a few examples of where there are misunderstanding of the arrangements, lack of direct strategies mentioned, poor use of terminology or there is content that is not relevant. The sections dealing with recovery operations were only cursorily explored as part of this submission. It appears this content also experiences the same problems.

**It is suggested** that a major review of the SEMP content is warranted.

### *Investigations (3.25)*

This section is poorly written and there is no 'investigating agency' under the plan. The control agency is responsible for investigations (refer 3.19.3). They may delegate one or more tasks of investigations to a support agency, for example, the police. However, there may have been a workplace injury during response operations that may need to be investigated by the control agency as well as by Workplace SA.

There are various agencies involved in investigations and have different responsibilities depending upon their legislative authority and the nature of the incident. It is the responsibility of the control agency to ensure that appropriate investigation bodies are notified and provided the appropriate assistance to undertake their task.

**It is suggested** that the SEMP must be amended to articulate this responsibility clearly.

### *Emergency Management Training (5.3.1)*

This section provides limited detail strategies as to how emergency management training is to be undertaken within and across agencies. The resolution of significant emergencies requires various agencies to collaborate and work together to achieve a successful outcome. It is essential that agency leaders who will undertake key roles during emergencies train together in a multi-agency environment.

### *Emergency Management Exercises (5.3.2)*

This section provides limited detailed strategies as to how emergency management exercising is to be undertaken within and across agencies. The Plan needs to state, at a minimum, the extent of the membership of CEWT, the minimum requirements for exercises by agencies and their reporting of lessons gained from the activity.

### *Response (6.1, 6.3 to 6.6.1 and 6.8)*

The 'Response Principles' are incomplete. This section also attempts to explain response operations for the resolution of emergencies using 'RABORD' – Reporting / Action / Build Up / Operation / Rundown / Debrief. It does not achieve this purpose. RABORD is used to assist in the structure of operational plans. The SEMP is not such a plan and it is inappropriate for it to be used in this way.

*Debriefs (6.9)*

Debrief requirements for agencies after the State Emergency Centre has been activated are not clear. The debriefs conducted for the extreme weather event that was held in the SEC clearly demonstrated that most participants were not able to differentiate between a Control Agency led multi-agency debrief of response operations and the requirements of a SEC operational debrief.

Current SEMP requirement (quoted below) does not ensure that the various levels of operations debrief in a structured way (e.g. all agency field operations debrief should be completed prior to the agency state level debrief to ensure all relevant issues are addressed.

*“Upon completion of any incident, each agency is to conduct an internal debrief. Within three weeks of the completion of the response to an incident involving the use of the SEC or a ZEST, a formal debrief will be convened by the control agency to ensure that any lessons learned are captured...”*

The time frame and hierarchy of review and reporting needs to be included to ensure all levels of incident and emergency management are thoroughly informed / reviewed / assessed upon completion of an incident.

It is suggested that a chart or matrix such as the example below (under the Response heading) be considered for inclusion in this part of the SEMP, supported by detailed reporting requirements in SEMP Part 3 – Annex F. The detail should also include a requirement that multi-agency debriefs should not be held in the SEC due to the confusion of context that it regularly creates.

SEMP incident debrief reporting time frames							
Field	Agency	SEC	Multi-Agency	Advisory Groups	SEMC	EMC	
	Progressive Reporting to the relevant authority						Review SEMC and SCC debriefs
							State Crisis Centre - within 2 weeks of the SEC
							Committee review - first meeting post Advisory Groups
							Recovery Multi-Agency - interim as required, final within 3 weeks of completion of operations
							SRAG & Recovery - first meeting post Multi-Agency State Level debrief
							Control Agency led Multi-Agency State level - within 2 weeks of the SEC debrief
							Control Agency led SEC with activated agencies, interested parties and operations staff - within 2 weeks of the Agency level debrief
							Individual Control Agency & Support Agencies at strategic Level - within 2 weeks of completion of Field level debriefs
							Individual groups - Functional Support Group Leaders, Capability Units, ZEST's, Agency Field or Regional centres - within 2 weeks of completion of operations

## *Glossary (8.)*

A key principle of any incident management model is the use of common terminology and definitions. Terms used throughout the SEMP document and its sub-plans must align with their definitions within the Glossary so there is no misunderstanding as to what is meant. Extreme care is required in the construction of statements.

An example where this is poor is under the heading 'SUPPORT AGENCY' where it states:

*Where a control agency is not the control agency for a particular emergency, they will be referred to as a support agency. A support agency will support the nominated control agency and is subject to direction by the nominated control agency.*

This statement can be inferred in different ways. One way is that only nominated Control Agencies, when they are not acting in that role for a particular emergency, can be deemed to be Support Agencies.

It is suggested that this can be overcome by the statement being re-written as:

*Agencies involved in response operations, including nominated control agency when not the control agency for a particular emergency, are a support agency and subject to the control of the control agency for that emergency.*

Within the SEMP the term 'control' is used on occasions when the appropriate term is 'command' and the opposite is also the case. While the Act does not define command, it is clear that control relates to controlling other agencies. These terms are clearly defined within the Glossary and align with the definitions contained in the Emergency Management Australia Glossary that is considered an Australian standard for emergency management terminology.

Additionally, there are examples within the Plan where the language is not consistent with the Act and likely to lead to misunderstandings or confusion.

**It is suggested** that the SEMP be carefully reviewed to ensure that terms and words used are in accordance with the definitions contained in the Glossary and language used is consistent with the Act.

### *Re-organisation of SEMP content in Part 2-Arrangements.*

**The authors suggest** that the order and structure of this Part be changed to better reflect the requirements of section 5A of the Emergency Management Act 2004, and to improve the flow and logical order of the document.

Below is a suggested format with brief outlines of the content allocated to each heading as an example:

### **Introduction**

This section to summarise information that the plan is: prepared, kept under review, maintained by SEMC, provision requirements of EM Act Section 5A, i.e. detailed strategies for dealing with emergencies in South Australia.

### **Aim**

Simple statement of what this plan intends to do, based on EM Act Section 2 (1) Objects of the Act to “*promote prompt and effective decision-making*”, “*comprehensive and integrated planning*” and “*promote community resilience and reduce community vulnerability*”.

### **Application**

Simply describe the role of the plan

EM responsibilities: State Govt, Local Govt, Business, Non-Govt, Individuals

Response: outline role of Control Agency, Coordinating Agency, Recovery etc

### **Limitations**

Not applicable in industrial disputes etc

### **Authorities**

Outline those elements that have authority within this plan (not the components of the plan) e.g. provide reference to specific areas of Acts etc and simply state what is prescribed or controls actions

The EM Act

- SEMC role
- Function powers of State Coordinator
- Coordinating Agency
- Control Agency
- Declarations
- Powers of Authorized officers

The Role of EMC

Role of Australian Government

- EMA
- Assistance
- National Plans or Policy Principles

### **Structures**

Outline the various structures required by the Act and this plan (i.e. the those created to ensure “*comprehensive and integrated planning*”)

Examples include:

EMC, SEMC, State Advisory Groups, Recovery, Agency Chief Exec’s, State Recovery Coordinator, EM Zone committee’s and Functional Support Groups

## **Prevention**

- Hazard Leader role and allocation
- SA Emergency Risk Management requirements and responsibilities
- Community Resilience requirements
- Business Continuity requirements (for organisational resilience)
- National Plans that direct framework – NSDR, NCTC, Health etc

## **Preparedness**

- Planning for each role an agency might be required to undertake: e.g. Hazard leader, Response agency, Recovery etc. include requirement for plans to use RABORD format and a rigorous assurance process
- Facilities required to support activities expressed as a need to have a facility capable of housing xyz to ensure role can be effectively supported: State Crisis Centre, State Emergency Centre, State Operations Centre's, Functional Support Group Operations Centres, Incident Management Teams, Zone Emergency Support Teams, Field Operations etc
- Positions: e.g. Zone Coordinator requirement
- Public Information requirements for community resilience
- Policies: reference to the need for Annex's such as Traffic Management at Emergencies, Evacuation etc

## **Response**

Dictate the emergency response arrangements. Must include the principles, legislated positions, other appointments, incident management details e.g. 10 responsibilities and functional management outlined as follows:

- Principles of command & control (AIIMS, ICCS Plus and other industry models)
- Response principles/elements: Control Agency primacy and functional management of operations
- Coordinating Agency role: how it is applicable at all times and how to apply at all management levels
- State Coordinator: how powers practically applied e.g. declarations, appointing Assistant State Coordinator's, activating SEC etc (The existing RABORD content does not belong in this plan. It is operational info that belongs in the operations manual. The SEC Coordinator role is also an item for the ops manual, not this plan as it solely applies to the role of the centre)
- Public Information during event
- Control Agency (responsibilities of State Controller and matrix of which agency for which emergency)
- Support Agency (describe supplementary role responsibilities)
- Investigations (include others with responsibility e.g. Workplace, Coroner, ATSB etc)
- Authorized Officers (who and how applicable)

- Relief Operations (describe what is required – currently no mention at all)
- Transition to Recovery (detail triggers, process and responsibilities)

### **Recovery**

Describe how to take over from relief and/or just response operations  
 How ongoing is to be managed (including mandating requirements for Public Information and other agency involvement)  
 Detail who, how and when of Appointments required for on-going recovery  
 Reporting and Debriefing after response operations completed

### **Debriefs**

Prescribe pyramid structure to ensure components are reporting to responsible authority before that authority reports upwards

### **Training**

Detail requirements including CEWT membership and role, who and how must exercise, etc

### **Administration**

Prescribe who is responsible for this plan and how it is managed

### **Glossary**

### **Acronyms**

### **Annexes**

List those in existence that detail requirements laid out in the plan above.

## **PART 3-GUIDELINES AND FRAMEWORKS**

The concept of SEMC having ‘noted guidelines and frameworks’ and expecting them to be applied within the emergency management arrangements is flawed.

**It is suggested** that to comply with the Act SEMC needs to approve guidelines and frameworks and also needs to insure the content is integrated into the SEMP as detailed strategies.

## **PART 4 - PLANS**

Control agency plans have been added to the planning framework. The requirements and description of control agency plans is not detailed or directive.

The ‘plan approval process’ described is not sufficiently rigorous to be an assurance process. Assurance requires independent scrutiny and verifications by person/s with detailed understanding of the subject and the broad emergency management arrangements, together with a report stating whether the plan meets or does not meet the criteria and standards for that type of plan.

**The authors propose the following key recommendations for consideration:**

**Key Recommendation 1**

The SEMP undergo a comprehensive review and takes into consideration the improvements and deficiencies identified in this submission.

**Key Recommendation 2**

A SEMP Practice Guide be prepared that explains in more detail the operations of each part of the emergency management arranges, and collates the collective wisdom and lessons gained from experience, to form an underpinning text for practice and training.

**Key Recommendation 3**

The plan assurance methodology described in Part 4 includes an independent review/audit of the proposed changes. The person conducting the audit would be required to endorse the proposed changes as:

- Not conflicting with other aspects of the SEMP, annexures, and associated plans and manuals
- Words align with the definitions contained in the Act or SEMP Glossary
- Correct naming conventions used
- Changes required to other SEMP documents – annexures, and associated plans and manuals are identified and incorporated into the update approval submission.

**Key Recommendation 4**

An ‘Office of Emergency Management’ be created to support SEMC to develop and maintain arrangements to ensure the resources of the State can be applied effectively in responding to and resolving declared emergencies and disasters. This Office to work collaboratively with the emergency management units of Department of Premier and Cabinet and SAFECOM, and the State Recovery Office.

In various jurisdictions, this role is performed by an appointed Disaster Management Coordinator or Inspector General (or similar term) and support by a small team.

Responsibilities of this office would include:

- Maintaining the State Emergency Management Plan and its sub-plans
- Keeping under review the State Emergency Management Plan Practice Guide – a document to inform how to apply the aspects of the SEMP
- Reviewing significant emergencies to inform training needs and improvements to the emergency management arrangements
- Coordinating, developing, presenting and reviewing multi-agency training
- Oversee the emergency management exercise program
- Audit nominated control agencies’ multi-agency incident management arrangements
- Audit agencies’ internal emergency management plans and training packages to ensure alignment with the SEMP.