

St Andrews First Aid Submission to the Civil Contingencies Act 2004: Call for Views

Executive Summary

St Andrews First Aid welcomes the opportunity to contribute to the review of the Civil Contingencies Act 2004 (CCA). Drawing upon extensive experience supporting preparedness, response, recovery and community resilience activities across Scotland, this submission reflects the perspective of a voluntary sector organisation operating within the wider resilience community.

The submission identifies a number of important opportunities for future reform. While the Civil Contingencies Act continues to provide a valuable foundation for emergency preparedness and response, the risk landscape has evolved significantly since its introduction. Modern emergencies increasingly include prolonged, interconnected and cumulative events that may not have a single triggering incident but nevertheless require coordinated resilience activity.

A recurring theme throughout this submission is the need for a stronger whole-of-society approach to resilience, recognising the contribution of public, private, voluntary and community sectors. Voluntary, Community and Faith Sector (VCFS) organisations should be recognised as strategic partners that contribute not only to response activities but also prevention, preparedness, recovery and community resilience.

The submission also highlights the growing importance of Critical National Infrastructure (CNI), supply chains and societal dependencies, together with the need for greater consistency in engagement, assurance, governance and partnership arrangements across the resilience system.

Future reforms should focus on strengthening collaboration, improving accountability and ensuring that resilience arrangements reflect contemporary risks while preserving the independence, flexibility and community focus that make voluntary organisations effective.

About St Andrews First Aid

St Andrews First Aid is Scotland's leading first aid charity and part of voluntary sector resilience partnerships. Through its volunteers, employees and community networks, the organisation supports prevent, preparedness, response and recovery activities across Scotland.

The organisation provides first aid services, community resilience initiatives, emergency response support, public education and training, humanitarian assistance and support to public sector partners during emergencies and major incidents. Through its engagement with communities and resilience partners, St Andrews First Aid contributes to building safer, healthier and more resilient communities.

Purpose of this Submission

This submission reflects the experience and perspective of St Andrews First Aid as a voluntary sector organisation operating within Scotland's resilience framework.

The responses draw upon operational experience, partnership working, volunteer management, community resilience activities and engagement with multi-agency preparedness, response and recovery arrangements.

The submission seeks to support the ongoing development of resilience legislation and policy by identifying areas where the Civil Contingencies Act 2004 could be updated to better reflect contemporary risks, evolving societal needs and a whole-of-society approach to resilience.

Cross-Cutting Themes

The consultation responses identify six recurring themes.

Modernising the Definition of Emergencies

The current legislative framework would benefit from recognising prolonged, emerging and cumulative events alongside traditional sudden-impact emergencies.

Whole-of-Society Resilience

Resilience is most effective when government, emergency responders, businesses, voluntary organisations, communities and individuals work together to strengthen preparedness and recovery.

Strategic Value of the VCFS

VCFS organisations contribute much more than emergency response capability. They support prevention, preparedness, social cohesion, recovery, personal and community development, social responsibility, empowerment, enhancing skills and knowledge, welfare, volunteering and community resilience.

Consistency Across the Resilience System

National standards and expectations could reduce variation in engagement, preparedness and capability between geographical areas and sectors.

Importance of Critical National Infrastructure

Modern society relies upon increasingly interconnected infrastructure and supply chains. These dependencies should be more fully reflected within resilience legislation and planning arrangements.

Sustainability of Community Resilience

Volunteering, community capability and local resilience require ongoing investment and support if they are to remain sustainable and effective over the long term.

Key Recommendations

The consultation responses identify several overarching recommendations:

Strategic Recommendations

1. Update the definition of an emergency to recognise slow-burning, cumulative and interconnected events alongside sudden-impact incidents.
2. Strengthen accountability, assurance and performance monitoring arrangements across the resilience system.
3. Improve consistency of engagement between resilience partnerships and voluntary sector organisations.
4. Recognise VCFS organisations as strategic resilience partners rather than supplementary response resources.
5. Increase voluntary sector participation in governance, planning, exercising and training activities.
6. Review responder categories and resilience responsibilities to reflect modern infrastructure, supply chain and societal dependencies.
7. Strengthen recognition of Critical National Infrastructure interdependencies and cascading impacts.
8. Support volunteer sustainability through long-term investment, funding and workforce development.
9. Embed a genuine whole-of-society approach within future resilience legislation, policy and guidance.

Note: The questions included in this report are those most relevant to the role of St Andrews First Aid as a voluntary sector resilience partner in Scotland. As a result, responses have been selected from across the consultation and may not appear in the same order as the original questionnaire.

Full Consultation Responses

Section 2: Local Arrangements for Civil Protection

Q15. Does the current definition reflect your understanding of an emergency?

While the current definition captures many of the events envisaged when the Act was introduced, it does not fully reflect the risks and challenges faced today. The definition would benefit from recognising a broader range of emergency scenarios and moving beyond the traditional perception of a sudden-impact event.

Many modern emergencies may not have a single triggering incident but can still have significant consequences requiring coordinated resilience activity. Examples include:

- COVID-19
- Cost of living pressures
- Energy insecurity
- Extreme weather and climate adaptation
- Cyber incidents affecting essential services
- Racial/migration tensions leading to social unrest

The definition should therefore encompass events that emerge gradually, occur concurrently or produce cumulative impacts which require coordinated resilience activity, regardless of whether a single triggering incident can be identified.

Section 3: Resilience Structures

Q30. What, if any, impacts have arisen from national resilience arrangements being non-statutory?

From a voluntary sector perspective, the fact that national resilience arrangements are largely non-statutory has not generally prevented effective collaboration. In many areas, resilience partnerships work well because of strong relationships, shared objectives and a collective commitment to protecting communities.

However, the effectiveness of these arrangements often depends on local leadership, culture and organisational priorities rather than a consistently applied national approach. The absence of statutory requirements can contribute to variation in organisational engagement, preparedness, investment and capability across sectors.

Many voluntary organisations provide significant operational capacity, specialist expertise and trusted community connections without being subject to formal assurance or preparedness requirements. This can result in inconsistent standards, expectations and levels of integration within resilience structures.

The greater challenge is therefore not whether arrangements are statutory, but whether sufficient accountability, assurance and oversight exist across the resilience system. There is

currently no consistent mechanism to assess preparedness, implementation of lessons identified or whether capabilities and capacities are sufficient across all sectors.

For voluntary organisations, clearer national standards, stronger assurance arrangements and more consistent performance monitoring may provide greater benefits than additional legislation alone. Such an approach would support continuous improvement, provide greater confidence in resilience outcomes and help ensure that all partners contribute effectively while retaining flexibility to respond to local circumstances.

Ultimately, effective resilience depends on clear expectations, accountability and collective responsibility across the whole resilience community.

Q31. A number of Category 1 and Category 2 responders are drawn from CNI sectors. How appropriate is the role of CNI in emergencies captured in the CCA 2004?

The role of Critical National Infrastructure (CNI) in emergencies is not fully reflected within the Civil Contingencies Act 2004. As a voluntary sector organisation, we recognise that preparedness, response and recovery are heavily dependent on resilient infrastructure, including energy, telecommunications, fuel, transport, water, digital networks and supply chains. Failure within any of these sectors can have significant consequences for responders, communities and wider societal resilience.

The growing complexity of dependencies and interdependencies means that disruption in one sector can quickly create cascading impacts across many others. For example, geopolitical events affecting energy supplies can increase costs, disrupt supply chains and contribute to wider cost of living pressures. These impacts reduce individual and household resilience, making it harder for people to prepare for, respond to and recover from emergencies.

From a voluntary sector perspective, such pressures often increase demand for community support, welfare services and resilience activities. However, voluntary organisations are frequently affected by the same challenges as public sector organisations, including rising operating costs, reduced volunteer availability, workforce pressures and limited financial resources. As a result, expectations of support increase at the same time organisational capacity may be constrained.

Q32. Should any further CNI sector actors be captured within the scope of the CCA 2004?

Consideration should also be given to whether the current responder framework adequately reflects modern CNI dependencies. Sectors such as renewable energy, freight transport, haulage, commercial logistics and pharmaceutical manufacturing and distribution play a critical role in societal resilience. Consideration could therefore be given to expanding Category 2 responsibilities or introducing a new category of resilience partner to strengthen information sharing, planning, exercising and collaboration with organisations whose services are critical to maintaining societal resilience.

Q33. What changes, if any, to the CCA 2004 could help improve partnership working between categorised responders and the VCFS?

While many areas have mature and effective arrangements, others continue to experience limited engagement, unclear expectations and under-utilisation of voluntary sector capabilities.

The UK Government's 2025 consultation on strengthening partnerships with the voluntary, community and faith sector identified a significant gap between responder perceptions and VCFS experiences, with many organisations reporting that poor engagement had reduced effectiveness during preparedness, response and recovery.

Rather than creating a new statutory responder status for voluntary organisations, the focus should be on:

- Nationally consistent engagement expectations.
- Formal inclusion of VCFS organisations within resilience governance arrangements.
- Greater participation in planning, training and exercising.
- Improved information sharing and situational awareness.
- Clear accountability for engagement under existing duties.
- Sustainable funding arrangements that support readiness and capability.
- Identifying systemically important organisations that are known for providing appropriate leadership, resources and infrastructure, including St Andrews First Aid, St John Ambulance and the British Red Cross.

VCFS organisations should be recognised as strategic partners rather than supplementary resources. Their contribution extends beyond emergency response into prevention, preparedness, community resilience, recovery, social cohesion and support for vulnerable people.

Government should consider establishing a consistent national expectation that each resilience partnership, forum or equivalent structure maintains formal VCFS engagement arrangements supported by agreed governance, communication, training, exercising and activation processes.

This approach would improve consistency, promote stronger partnerships and ensure that communities benefit from the full contribution of the voluntary sector while preserving its independence and flexibility.

Q35. Please use the free text box to note anything in regards to Resilience Structures that is not captured by the previous questions.

Many voluntary organisations already deliver functions that are critical to prevention, preparedness, response and recovery activities, including humanitarian assistance, welfare support, community engagement, public information, recovery support and community resilience development.

The wider societal benefits of volunteering should also be recognised. Voluntary organisations not only provide operational capability but help strengthen community cohesion, build confidence, develop skills and support long-term resilience within communities.

The Act should continue to preserve the independence and flexibility of voluntary organisations. The sector should not become a statutory responder, as its effectiveness often derives from strong community connections, adaptability and the ability to complement statutory services.

Government should focus on strengthening the conditions that support effective partnership working through:

- Consistent engagement standards.
- Formal governance arrangements.
- Sustainable funding and investment.
- Inclusion in training and exercising programmes.
- Quality assurance arrangements.
- Clear communication and activation processes.
- Support for volunteer recruitment and retention.
- Certified training programmes at recognised centres.

The most effective resilience arrangements are those in which voluntary organisations are included as trusted partners in planning and decision-making rather than engaged only during emergencies. Strengthening collaboration in this way would improve preparedness, enhance community resilience and support better outcomes for affected communities.

Final Thoughts

The Civil Contingencies Act 2004 has provided an important framework for emergency preparedness, response and recovery across the United Kingdom. From a voluntary sector perspective, the Act has helped establish partnership working and created opportunities for voluntary, community and faith sector (VCFS) organisations to contribute to resilience activities. However, the quality and consistency of engagement with the sector continues to vary significantly across the UK.

Where VCFS organisations are fully integrated into resilience arrangements, they provide substantial benefits through local knowledge, trusted community relationships, specialist capabilities, humanitarian assistance, welfare support, recovery services and engagement with vulnerable and seldom-heard groups. In many areas, these relationships have developed into genuine partnerships based on trust, shared objectives and mutual respect. Elsewhere, engagement remains inconsistent and reliant on individual relationships rather than embedded structures and processes.

VCFS organisations should be recognised as strategic partners in resilience rather than simply additional resources during emergencies. Their contribution extends beyond response activities and includes prevention, preparedness, recovery, community capacity building,

social cohesion, skills development and wellbeing support. These contributions are fundamental to societal resilience and should be reflected within future resilience policies and frameworks.

Any future changes to the Civil Contingencies Act should seek to improve consistency of engagement between statutory responders and voluntary organisations while preserving the independence, flexibility and community focus that make the sector effective. We do not believe voluntary organisations should become statutory responders. Their value lies in complementing statutory services, responding flexibly to community needs and maintaining trusted relationships within communities. However, stronger expectations around engagement, planning, exercising, information sharing and participation in resilience structures would help ensure more consistent practice across the resilience system.

The sustainability of the voluntary sector must also be recognised. Many organisations face increasing demand, financial pressures and challenges in recruiting and retaining volunteers. Any additional expectations should be supported by appropriate investment, recognition and long-term support.

Ultimately, resilience is a shared endeavour. Future reforms should embrace a genuine whole-of-society approach that strengthens collaboration between public, private and voluntary sectors, recognising that resilient communities are built through strong partnerships, active volunteers, empowered communities and trusted local relationships

Submitted by: CEO of St Andrews First Aid

Consultation: Civil Contingencies Act 2004 - Call for Views

Perspective: Voluntary Sector Organisation Scotland