

Consultation Response

1. The Government's response to comments suggests that most were generally supportive of the draft Framework, though with no overall consensus apart from continued support for the requirement that Fire and Rescue Authorities should continue to produce Integrated Risk Management Plans (IRMPs).
2. Hereford & Worcester Fire and Rescue Authority was one of 42 Fire and Rescue Authorities, which responded to the consultation. The following table notes the Authority's chief concerns along with the general response from Government:

HWFRA concerns	General response from Government
The revised Framework was overly prescriptive with too many absolute duties, including that of preparing an Integrated Risk Management Plan.	Government responded that the Framework will continue to use the term 'must' rather than 'should' to be clear about their priorities and objectives for Fire and Rescue Authorities. The response states that most fire and rescue services supported the need to produce IRMPs.
There was little recognition of the resource limitations facing Fire and Rescue Authorities.	Government responded that the Framework clarifies the roles of Fire and Rescue Authorities and the Government, and imposes no new functions or duties on Fire and Rescue Authorities.
There was potential for the requirements to become overly detailed, onerous and bureaucratic.	Some textual changes have been made to temper the requirements – for instance ' <i>all risks</i> ' has become ' <i>foreseeable risks</i> ', ' <i>deliver prevention and protection activities</i> ' has become ' <i>deliver effective and proportionate prevention and protection activities</i> .' The need to prepare an annual statement of assurance remains, but Government has added that they will provide ' <i>light touch guidance</i> ' on the required contents.
There was a lack of detail in certain key areas such as national resilience and assurance measures.	Further detail has been included in the Resilience section of the report to reflect the establishment of the Fire and Rescue Strategic Resilience Board. Additional detail has also been added in relation to the Government's role in delivering interoperability.

3. Further details of the Fire and Rescue Authority's consideration and consultation submission can be found in the minutes of the Policy and Resources Committee held on 7 March 2012, agenda item 6 – 'Response to Consultation on the Draft National Framework for England'. That report and the Government's 'Summary of responses' document can be found in the background papers of this report.