

Appendix 2

Draft HWFRS response to the Government consultation on a revised Fire and Rescue National Framework for England

The following headings relate to the question areas set out in the consultation document.

Delivery of Core Functions

In terms of identifying and assessing risks set out in paragraphs 2.1 and 2.2, there is no guidance on how to assess all foreseeable fire and rescue related risks, which is likely to lead to an inconsistent approach across the country. While we continue to welcome local determination of risks, we would appreciate additional guidance on assessing the potential impact of those risks. There is also a requirement to prevent and mitigate national level risks. However it is not clear where the delineation of responsibility falls, especially for those escalated to the Strategic Resilience Board.

With the lack of clarity on standards or benchmarks by which fire and rescue services assess risks, there are likely to be inevitable variance across the country, and also variance in HMICFRS inspection outcomes as a consequence.

We welcome the focus on prevention and protection, particularly the need to target those most vulnerable. This has already been a long-standing focus in our Community Risk Management Plan and is a central strand of our Community Risk activities.

We also welcome the recognition that fire and rescue staff can do more towards keeping people safe and improving people's lives through their work with other organisations and services. This is also an important feature of our 'Saving More Lives' vision and our 'Signposting' work. However, this raises an apparent contradiction in paragraphs 2.5 and 2.6, that suggests that fire and rescue services should do more in addressing issues around vulnerability and the health and wellbeing agenda, including abuse and exploitation, but not if it impacts adversely on core fire functions. We would welcome more clarity in this respect.

The proposed Framework also recognises that fire and rescue staff will require new skills sets to be able to effectively carry out people-facing work in local communities. However, training budgets are already stretched following years of making efficiencies. So again, we would welcome clarity on how to do this without impacting on core functions.

The section on evaluation (paragraph 2.8) suggests that fire and rescue services should only pursue those prevention and protection activities that demonstrably reduce risk effectively and cost-efficiently. However, that appears to be a very narrow and possibly imprecise measure. Much prevention work only shows results over time, such as long-term changes in people's safety related behaviour, which may not be evident in short-term performance returns. Additional guidance and clarity on what the Government expects 'robust evaluation' to look like would be welcomed.

We note at paragraph 2.10 that "fire and rescue authorities *can* enter into reinforcement schemes ...". Is there any particular reason why this is a change of emphasis from the 2012 version of the National Framework, which stated that "fire and rescue authorities *are required to* enter into reinforcement schemes ..."?

In terms of national resilience at paragraph 2.11, provision is based on the National Risk Assessment and National Risk Planning Assumptions. Fire and rescue services are not in a position to determine response options to national scale risks through their local IRMPs.

In relation to the section on the IRMP, there is little up to date guidance to assist fire and rescue services in writing their IRMPs, which vary considerably across the country. As noted above, we would welcome further guidance, especially in relation to the methodology to be used for evaluating the effectiveness and cost-efficiency of service delivery outcomes and the allocation of resources to mitigate risks. Such guidance would also help to ensure consistency in using evaluation criteria: it would also provide sufficient rigour and quality assurance when reporting.

Inspection, Accountability and Assurance

We note that HMICFRS will be consulting on the criteria to be used to judge and measure effectiveness, efficiency and performance. Once these are established, it would be useful to make appropriate reference in the National Framework.

At paragraph 3.4, while fire and rescue authorities will need to comply with the provision of data to HMICFRS as part of the inspection process, there will need to be sufficient notice and time to assemble the required data. This is especially important for those fire and rescue services in earlier tranches for inspection, and recognition should be made that not all services have the same levels of staff resources available.

In terms of intervention powers, there is no mention of PCC fire and rescue authorities. There needs to be clarification of whether or not PCC fire and rescue authorities will be subject to the same intervention powers.

Likewise, there is a need to clarify whether or not the provisions for accountability in paragraph 3.10 to 3.12 will be applicable to PCC fire and rescue authorities.

Paragraphs 3.14 and 3.15 refer to the Police, Fire and Crime Panel (PFCP) and its scrutiny role. However, there appears to be no requirement for fire and rescue expertise to be represented on the PFCP. The differences between Police, Fire and Crime Panels and Police and Crime Panels needs to be clarified, particularly in relation to their relative powers, responsibilities and membership requirements.

Governance

There is no clear direction given or expectations provided for governance arrangements. It is also noted that governance will not be included in the HMICFRS inspection programme, other than where inspectors find that fire authority decisions and activities inhibit the efficiency and effectiveness of the chief fire officer. Considering that this is the primary strategic decision making mechanism for the organisation, this would appear to present a significant gap.

There also appear to be no plans to inspect or assess the effectiveness of PCC governance arrangements.

At paragraph 4.7, there is an expectation that the fire and rescue authority should give due regard to the professional advice of the chief fire officer. It should be clarified whether or not this expectation will also extend to PCC fire and rescue authorities.

Paragraphs 4.8 to 4.11 refer to plans to be prepared by PCC fire and rescue authorities. It appears to be both unhelpful and inefficient for PCC fire and rescue authorities to have to produce a fire and rescue plan, which can be combined with a police and crime plan, *and also* a separate IRMP, which also details how it will meet the requirements of the fire and rescue plan. This is likely to result in unnecessary overlaps and duplication, which should be avoided. The fire and rescue statement also appears to be a similar requirement to the annual statement of assurance. Again, this appears to be inefficient duplication.

Further guidance on the required content of PCC fire and rescue plans and statements would be useful to help avoid unnecessary duplication with IRMPs and statements of assurance.

Achieving Value for Money

Overall, we would question whether a National Framework document is the appropriate place for these provisions, which are already required by Budget and Precept Setting regulations. We would also question how a county council based fire authority would be able to comply with the provisions.

The Framework sets out many expectations that do not seem to recognise the much reduced resources of fire and rescue services, nor the fact that further reductions are likely to be ongoing for years to come. The expectations will inevitably place additional burdens on what are effectively shrinking organisations.

Similarly, the Framework does not say anything about additional costs that might be incurred in delivering the Government's wider fire reform agenda, nor indeed how any savings realised should

be utilised.

We would welcome further guidance and direction on the specific requirements for cost-benefit analysis of fire and rescue service activities, the financial return on investment, multi-agency partnership working return and social return on investment.

In relation to collaboration at paragraphs 5.13 – 5.16, there does not appear to be any common purpose identified for the three blue light services leaders. While being directed to work together in collaboration for the benefit of the public, there is no set common goal for these services and other key organisations to work towards.

Workforce

In relation to professional standards at paragraphs 6.3 and 6.4, it is noted that all fire and rescue authorities are required to implement the standards. However, the standards will arrive before the final Framework document is published, which means that fire and rescue authorities are very unlikely to be able to demonstrate compliance in the first year of inspection.

National Resilience

While there is a commitment from the Government to assist in considering the gap between existing National Resilience capability and the required capability, there is no apparent commitment to assist in closing that gap. Further clarification in the Framework would be welcome.

In terms of National Resilience assurance at paragraphs 7.16 and 7.17, there is a requirement to assure Government that National Resilience arrangements and capabilities are appropriate. We would have expected that this assurance should also be given to the general public as well as Government.

Intervention Protocol

We have no comments at this stage.

Other comments

We note the list of consultees in the Introduction to the consultation document. We would have expected the consultation to extend directly to Unison and other public sector trades unions in addition to the FBU, FOA and RFU.