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Chief Fire Officer / Chief Executive Nathan Travis BA(Hons) MPA

Chief Operating Officer HMICFRS 6<sup>th</sup> floor, Globe House 89 Eccleston Square London SW1V 1PN

Date

Dear Sir/Madam

### Proposed fire and rescue service inspection programme and framework 2018/19

Thank you for the opportunity to comment on the proposed inspection programme. We trust you will find the following comments a constructive contribution to your considerations.

We offer the following comments in response to the specific questions in the consultation document.

## Question 1: What do you think of the proposed approach to FRS inspection that HMICFRS proposes to conduct in 2018/19? How could this be improved?

The proposed approach should enable HMICFRS to look at Fire and Rescue Services in a wider context than within the bounds of a particular theme. However, the timescale is relatively short to cover all 45 Fire and Rescue Services. At best, we would expect that inspectors will only get a snapshot of the activity and performance of each Fire and Rescue Service. It is not clear how this will be addressed. For instance, could previous independent inspections, such as the Audit Commission direction of travel, use of resources and comprehensive performance assessments, be examined to help gain a better context?

## Question 2: Do you agree that an integrated inspection of fire and rescue services' effectiveness and efficiency, and how they look after their people, is better than separate thematic inspections?

The integrated inspection of effectiveness and efficiency should provide a more comprehensive picture of the fire and rescue service, rather than separate thematic inspections. The integrated inspection should provide a broader range of information and evidence that will be of benefit to the public in understanding how their Fire and Rescue Service is performing as a whole. It should also help to ensure that evidence that crosses more than one area can be shown and linked where appropriate. An integrated approach will also be a good starting point for any future more specific risk based inspections to follow.



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### Question 3: Are there any other areas of fire and rescue services' activity that should be included in the integrated inspections?

While governance and accountability are not included in the inspections, we would expect the inspectors to take account of the impact on staff and services of any proposed changes to governance, such as where a PCC business case is being considered.

There also appears to be no specific questions posed around the growing health agenda and the associated partnerships and initiatives being explored by fire and rescue services. Likewise, collaboration, which is a central feature of the Fire Reform programme and is a key driver for Fire and Rescue Services, is only directly referred to in section 2.1.6 of the proposed questions. Partnership working is mentioned in section 1.2.5 in relation to fire setter behaviour and section 1.5.5 covers joint working in relation to multi-agency exercising. This may miss many others areas of joint work that Fire and Rescue Services are involved in to benefit their communities.

# Question 4: Does the draft inspection methodology (annex A) include the right questions to gather evidence for a rounded assessment of fire and rescue services? How could this be improved?

Apart from the point about collaboration activities noted above, the questions are well framed to gather good evidence on efficiency, effectiveness and people. It is understandable that there are considerably more questions about effectiveness, as that is an area where the public can clearly recognise how their Fire and Rescue Service is performing. The wording of the questions looks to be carefully chosen to avoid simple number counting and tick-box exercises, which is to be welcomed.

We would expect that all 45 Fire and Rescue Services will be asked the same set of questions to ensure consistency.

# Question 5: How else could HMICFRS adapt the way in which it acquires information to take full account of the circumstances of fire and rescue services and of risks to public safety?

As noted above, we consider that a one-off inspection will only provide a snapshot of each Fire and Rescue Service. Public surveys are proposed as part of the inspection, but it is not clear how extensive they will be, what questions they will ask, and what judgement criteria will be applied to the responses. From experience, public surveys tend to yield a poor response rate, so it may be useful for HMICFRS to consider other ways of evaluating the public views on their Fire and Rescue Services. It is not clear whether responses from staff, public and focus groups would be weighted in any way.



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### Question 6: What, if any, new or emerging problems for fire and rescue services should HMICFRS take into account in its inspections?

The impact of the ongoing austerity measures should not be underestimated. This has impacted greater in some Fire and Rescue Services than others. Importantly, it has also impacted on other public sector organisations that also have a key role to play in maintaining the health, wellbeing and safety of vulnerable individuals in our communities. For example, people who are vulnerable due to their age, health, social isolation, substance abuse and/or exploitation could also – as a consequence – be more vulnerable to injury or death from fire. However, because of the financial pressures on these other public sector organisations, their ability to readily identify, proactively support and work with other partners (such as Fire and Rescue Services) to reduce these risks is increasingly challenged.

HMICFRS will also need to appreciate that austerity does not affect all FRSs in equal measure; some are better placed to ease the effects of austerity than others.

In addition, organisational uncertainties for Fire and Rescue Services about future governance, the potential introduction of shared services, pay caps, and the practicalities of collaboration/merger, all have an impact that should not be discounted in the inspection.

## Question 7: What else should HMICFRS consider doing to make its fire and rescue service assessments as fair as they can be?

It will be very important to present the results of inspections fairly and in a way in which the public will understand. The consultation does not cover the criteria for judging and comparing performance and how this will take account of the particular circumstances of each Fire and Rescue Service. This will need to be carefully designed to ensure the variations in risk and demand in different Fire and Rescue Services are reflected and that any potential bias is mitigated. For example, inspectors will need to be able to provide a balanced judgement when addressing sub-diagnostic 1.2.1 in terms of quantity against quality, targeted approaches against blanket coverage, single service against multi-agency, and the overall impact on public safety and public perceptions of safety.

In terms of gradings, is it not clear if there will there be a league table approach. If there is, how would it take account of the wide differences between Fire and Rescue Services, for instance in terms of governance structures, geographical coverage, finances, historical make-up and both current and emerging demographics? Members of the public will not necessarily know, or be interested in, the varying organisational models, governance arrangements or funding criteria adopted across the 45 Fire and Rescue Services. If a ranked table approach is to be adopted, then grouping Fire and Rescue Services of a similar make-up would help to ensure that comparisons can be made and understood by the public in a more objective way.



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| We trust that you will find our | comments | useful. | Please | do not | t hesitate | to ( | contact | us i | if you |
|---------------------------------|----------|---------|--------|--------|------------|------|---------|------|--------|
| require clarification on any po | ints.    |         |        |        |            |      |         |      |        |

Yours sincerely,

Nathan Travis, Chief Fire Officer / Chief Executive

