

# Questionnaire

We would welcome comments on the following sections in the draft National Framework, or any general comments.

## Delivery of Core Functions

This section provides adequate direction and the more specific expectations around Protection activities, vulnerability and Safeguarding processes are welcome.

However, it was felt the section did not follow the natural flow of strategy development. The sub-sections on "identify and Assess" and IRMP would benefit from being brought together and serve to lead into this section. The IRMP is the primary driver for operational activity and this would naturally lead on to the section specifying Government expectations around PP&R.

It was also felt that this section was brief although it is recognised there are plans to develop a national standard for the production of IRMPs and there will be a direction for FRAs to have due regard to national standards as they evolve.

While there is some reference to the CCA and LRFs it is felt that Section 7 on National Resilience would serve well from being more fully referenced (or even included) in this section as NR is a core FRS function and not a separate role.

Within 2.2 there is an implicit assumption that all risks are not currently recognised and managed. This paragraph might more usefully read "*Fire and rescue authorities must put in place arrangements to prevent and mitigate these risks where necessary. This might be through adjusting existing provision, utilising effective collaboration and partnership working, or building new capability*"

2.8 evidencing success and cost effectiveness is the holy grail and is something that has been demonstrated as being difficult to achieve. Taken literally, this could in turn push us away from getting involved in innovative risk reduction work. Whilst we should aim to capture this type of information as initiatives progress, would not want it to stop exploration of initiatives based on good sense.

2.11 it might be useful in this paragraph to recognise that while there should be arrangements in place to manage the "full range of service delivery risks" there will inevitably be some impact on the level and scale of capability the Service is able to maintain through a business continuity event.

## Inspection, Accountability and Assurance

There is concern that this section confuses the issue of whether HMICFRS are inspecting the "Authority" or the "Service". While there isn't the same distinction between the two as exists with the Police the advice, up to this point, is that the inspection regime is to assess the Service on the basis that Authorities (elected officials) are held to account by the electorate. This confusion could be compounded by the statements in the Minister's foreword that HMICFRS will be established as "an independent regime for inspecting Fire and Rescue Authorities" while later he says that "Ultimately, it is to local communities, not government, that fire and rescue services are accountable".

It was felt that overall this section clearly outlines the roles and responsibilities of all parties but there was some concern that the references to IRMP in 3.13 seem overshadowed compared to their prominence in previous Framework Documents. It is recognised that recent legislative changes need to be incorporated but the detail of these may play a part in this.

The Authority questioned whether the PCP would have adequate powers or authority to effectively scrutinise a PPCC FRA when there are already accounts where this has been felt not to be possible with the existing Police relationship.

## Governance

Again, while the Authority recognised there was a need to incorporate recent legislative changes, brought about by the Policing and Crime Act 2017, into the Framework the current format felt unbalanced to the extent that it might appear to set an expectation beyond the language used in the Minister's address, where he reiterates that changes should only take place where "a local case is made".

While there is little guidance to FRAs in general on the production of plans, the references to the PCC Fire and Rescue Plan and Fire and Rescue Statement seemed very prescriptive with little clarity of what the relationship should be between this document and the IRMP - which a PCC FRA will presumably still need to create.

Additionally, the framework clearly states that the IRMP will be reviewed by the HMICFRS and the Fire Plan will be reviewed by the Scrutiny Panel, which seems somewhat disjointed.

## Achieving Value for Money

While it is recognised there is benefit from setting out the expectations in 5.1 to 5.4, for completeness, but these are all statutory responsibilities under other legislation for a local Authority, and it was felt a recognition of this would be worthwhile.

(Local Government Act 2003, The Localism Act 2011 and the Accounts and Audit Regulations 2015).

Other than the above the Authority felt this was a useful section that set out Government expectation clearly.

## Workforce

It was encouraging to see the Framework reference the work of the NFCC and direct FRS to have regard to the Work Force Strategy.

Equally the Authority felt it was valuable to be explicit about the expectations placed on FRS to comply with the fitness principles. However, it was felt that the inclusion of the principles as an annex was unnecessary in this document as it could be signposted.

The Authority is aware of the work that is currently underway to create a mechanism for creating national professional standards for fire and felt that it was important to reference this within the document and, as with the work of the NFCC and the Fitness Principles, have due regard to these standards. However, the Authority feel that the scope of these standards should go beyond just dealing with "workforce" issues and encompass organisational standards too. As such this subject might sit better in one of the pan-organisational sections such as "inspection..."

This Fire Authority fully supports the Governments direction on discouraging the re-employment of principal officers, except in exceptional circumstance and where there is an issue of public safety to be met. However, it felt there was no reason to be quite so emphatic about the subject in this document as it created an imbalance within the section that detracted from the overall impetus of the section.

The Authority felt there would be significant merit in specifically referencing the RDS or On-call model for operational provision and how it should be considered within any operational/workforce plan as a highly effective and low-cost model for low utility situations.

## National Resilience

As referenced earlier it was felt that this section fitted better within, or more closely allied to, "Delivery of Core Functions" even though it was recognised this is an area that benefits from direct government involvement and funding. Therefore, this is not a suggestion that the funding model should change but a recognition of the full scope of operations in a modern FRS.

## Intervention Protocol (Annex A)

This is a useful document, but not sure it should sit in the Framework. It is part of the Fire and Rescue Services Act 2004, and should be an annexe of that document. The reference to intervention at section 3.6 - 3.9 should be enough detail for this document.

## Other Comments

The document brings together, and provides considerable detail on the mechanical and institutional changes that will support the programme of reform outlined by the HO in 2016. However, this Authority feels it lacks a sense of coherence and flow. There is a considerable amount of detail in some areas, particularly those focusing on new forms of governance, but less direction to the existing ones.

FRA's rely on the Framework Document to help set longer term strategy. This current draft feels like it brings together existing ideas rather than setting out the government's long term vision for what place a modern FRS takes in society. Governance, inspection and standards are all key elements of assurance and improvement but they only serve to get you somewhere as opposed to describing the destination.

As a final note it would support FRA long term planning if the anticipated period of currency and review date for this Framework Document was set

**Thank you for participating in this consultation.**