

Response to HMICFRS Inspection Programme and Framework Consultation on behalf of the NFCC

1. What do you think of the proposed approach to FRS Inspection that HMICFRS proposes to conduct in 2018/19? How could it be improved?

The approach to inspection and the criteria for inspection are broadly appropriate for the first round of inspections and should, subject to the consistent application of the Inspection methodology by sufficiently skilled, high quality inspectors provide an overview of FRS performance. However, the approach does not appear to meet the transformational and reform expectations that were set for the sector following Theresa May's Fire Reform speech – May 2016.

Whilst it is clear that governance structures will not form part of the inspection criteria or process, the assessment process must be cognisant of the impact that a governing body can have on the key decisions made, which ultimately have an impact on the way in which services are delivered to local communities. Page 7 paragraph 2 of the consultation document references that HMICFRS will should it be required undertake a corporate governance inspection. This is different to the approach used for the police model, whereby the PCC will not be inspected by the HMICFRS. What is the evidence base for this difference in approach?

Where it is stated that apart from an inspection schedule, an inspection can be carried out at any time, it would be helpful to understand the circumstances that would lead to such an approach for clarity. To date, a precise timeline of inspections and the key steps in the inspection process have not been formalised and communicated. An understanding of these will help FRS to effectively plan for and support the efficient and effective delivery of inspection. When will this information be made available?

The intended approach of moving towards a risk based inspection following the first round of full inspections is the right approach and should ensure that future inspection programmes continue to maximise the value of this approach through focusing on the areas of need. However, an understanding of the risk based methodology to be used for identifying future inspections should be agreed with FRS prior to implementation.

It is noted that there is mixed terminology relating to the Service and the Authority throughout the various documents and communications. We would welcome clarity and consistency around the use of both terms. The Policing and Crime Act 2017 states that Authorities are the accountable body, however, HMICFRS documentation states that it is the Service that is scrutinised and in that context the accountable body.

2. Do you agree that integrated inspection of FRSs' effectiveness and efficiency and how they look after their people is better than separate thematic?

As a general approach, this makes sense as the approach follows the fundamental priorities of all public and emergency services in ensuring public safety using approaches which deliver value for money. This approach also follows the grounding of the Policing and Crime Act 2017, Cities and Devolution Act 2016 where a change in governance to a PCC or Mayor must be able to demonstrate that (a) it is in the interests of economy, efficiency and effectiveness for the order to be made, or (b) it is in the interests of public safety for the change to be made.

The approach to inspection will enable for a baseline of FRS. However, what is learned during inspection about sector performance may provide intelligence that informs the need for a more in-depth examination that can be offered by a thematic review approach. So, as such, inspection could be seen as a tool that complements and informs thematic review. However, as HMICFRS is not currently funded to carry out thematic reviews, it needs to be clarified as to how any themes arising from inspection would be addressed and how any costs would be attributed.

The FRS has received a small number of themed reviews (JESIP, National Resilience and MTFA for example). However, an evidence based understanding of the added value provided by a more systematic, thematic approach and the additional burden (costs, resources, time for example) potentially placed upon FRS by a thematic review(s) model should be explained. The police inspection framework has featured thematic review. This should provide the opportunity to transparently evaluate the relative contribution made by thematic reviews and could provide the evidence base to inform of their value or otherwise within a wider FRS framework.

The document however does make clear that themed inspections are not ruled out so as in 1. it would be important for clarity in the approach that would be taken to communicating a themed review and the triggers that would result in one.

3. Any there any other areas of FRS activity that should be included in the integrated inspections?

Consideration should be given to ensuring that the key messages arising from internal/external audits are considered and reflected within an integrated inspection approach. For example, the “Value for Money Conclusion” and Financial Statements opinion will provide evidence as to the economy, efficiency and effectiveness in the use of resources and compliance with accounting legislation. Included within the statement of accounts, the Annual Governance Statement sets out the framework and control environment within which FRS operate. Similarly, consideration should be given to the relevance of the Statement of Assurance. This will not detract from the intention of the inspection to focus upon the efficiency and effectiveness of our risk based service delivery and how well we look after our people but will help to contextualise and provide a richer picture of overall performance.

4. Does the draft inspection methodology include the right questions to gather evidence for a rounded inspection of FRS? How could this be improved?

There is as one would expect a clear focus on PPR, core legislative services. However, there appears to be a lack of focus on how FRS through collaboration and innovation have widened activities to provide earlier interventions across, for example, the public health arena, thereby improving wider outcomes for the vulnerable across society. Another example would be road safety prevention which is not a core legislative requirement but is reflected in the diagnostics. This ‘new’ activity has for many FRS become a key strategic priority and has extended the reach and value that the FRS sector delivers to the most vulnerable in its communities.

The diagnostic and sub diagnostic questions are very prescriptive. It is understood that this is important from providing a performance baseline and it should support the delivery of consistent inspections, enabling for performance comparisons to be made and future improvement to be measured. However, it will be important that Inspectors adopt a flexible approach to inspection which gives FRS the opportunity to evidence the full range of services, delivered and the innovative, transformative ways that FRS deliver strategy using both qualitative and quantitative measurement. Failure to do so will minimise the impact of Inspection and potentially provide an inaccurate view to communities as to the holistic performance of their FRS. The approach to enable for comparison of FRS through providing a rating (scoring) mechanism, has led to a fairly

generic question set. The differences in operating models, strategic priorities, outcomes and governance models probably mean this is inevitable and as such common denominators to enable for comparison have had to be developed. Clearly, we recognise the importance of transparency and being accountable to our communities and stakeholders.

Whilst, comparison as a result of using a graded judgement approach is inevitable, it is important that the differences, whether they be governance based, strategy driven or structural are recognised so that comparison is evidentially meaningful and fair. In enabling for transparency, it is important that the full range of service delivery, the supporting infrastructure, the transformative approach to enabling the impacts achieved in a value added, organisational wellbeing and community outcome sense are reflected in any inspection assessment. This will ensure the holistic picture of an area is taken into account.

Transparency is critical to maintaining FRS confidence and belief in the inspection process. In particular, this applies to ensuring that performance judgements are applied consistently and fairly. In supporting this expectation of transparency and fairness, work should be undertaken to build upon the 'good' judgement criteria that has been developed for each diagnostic within the inspection methodology. The provision of similar criteria for 'outstanding', 'requires improvement' and 'inadequate judgements' diagnostic will provide clarity around performance expectations and will help to ensure consistent judgements are made. It will also help FRS in preparing for Inspection to consider their relative performance position and proactively and positively take necessary corrective action.

Similarly, and building upon the police model, judgement criteria could be developed for all sub-diagnostic questions. This would enable for a clear understanding of the criteria that have to be met to support performance judgements. This level of detail is, perhaps, important in supporting new inspectors to deliver a new inspection approach in a high quality and evidenced based judgements to a consistent sector standard. Such an approach will build all parties trust and confidence in this new approach.

Also, again similar to the Police model, a pathway for ensuring appropriate substantiation of judgements, which encourages challenge will enable an understanding of the judgement context will support the identification of improvement opportunities.

5. How can HMICFRS adapt the way in which it acquires information to take full account of the circumstances of FRS and of risks to public safety?

Consideration should be given to the strategic analysis which is available in the locality and how it shapes and influences the concept of place and informs FRS strategic plans. For example, in designing strategy, aside from our legislative requirements, we consider the strategic analysis undertaken by our partners, including local authorities, Local Enterprise Partnerships, regional CBI Wider as integral to delivering a risk based service.

6. What, if any new or emerging problems for FRS should HMICFRS take into account in its inspections?

There will be a variance in answers dependent upon the local drivers and influences that impact upon every FRS from time to time. As such 'new' or 'emerging' problems will be different dependent upon which FRS is asked and when. This could, for example, relate to changes in funding influencing strategic priorities and deliverables creating performance variation across individual FRS. Through the establishment of an effective relationship with inspection liaison officers emerging problems impacting upon FRS should be considered as and when they emerge. Mechanisms should be in place to ensure that some form of analysis of emerging problems is undertaken by HMICFRS to determine whether change is required to the inspection process resultant of this intelligence. It is reasonable to propose that this question is routinely asked of FRS prior to the inspection process beginning. Inspectors should be agile and flexible and be able to ensure that local problems are contextualised and considered as part of the review process in a fair and transparent way.

7. What else should HMICFRS consider doing to make its FRS assessments as fair as they can be?

Given, the reliance on inspectors new to role, it is assumed that there will be a requirement to acquire new specific skills and knowledge to deliver high quality and consistent strategically focused inspections. In order to ensure the integrity and credibility of the inspection process, inspectors must maintain this strategic focus, remain objective and ensure that all judgements made are suitably evidenced. What have HMICFRS put in place to ensure that all inspectors acquire the appropriate skills, knowledge, understanding and behaviours to deliver this very specific role? How will this be evaluated throughout the first cycle of all 45 FRS inspections?

The pilot inspections offer the opportunity to test assumptions and determine whether both HMICFRS and FRS expectations of what inspection will deliver are achievable. As such, a period of evaluation should be built into these inspections as it is likely, due to the step change involved, that there will be some change required following the pilots. Feedback from all those involved in the inspection process should be invited and, in support of the transparency theme, findings should be published. Similarly, HMICFRS in collaboration with pilot FRSs, should host an event to share experiences and feedback to the wider FRS on the pilot inspections. This transparent and engaged approach will ensure that moving forward, FRS understand and are able to adapt to change.