



Delivery of Core Functions

The National Fire Chiefs Council (NFCC) supports the promotion of risk-based service delivery of prevention and protection through the development and delivery of an Integrated Risk Management Plan, as described by the framework. However, the draft framework distinguishes between protection, prevention and response by not placing that same risk-based expectation upon the design and delivery of response services. We believe that each discipline must be informed and led by robust risk analyses.

Risk management planning

Integrated Risk Management Planning (IRMP) is a critical activity required to reflect up-to-date risk analyses, including the assessment of all fire and rescue-related risk that could affect an authority's area, and details of how to prevent and protect against those risks, and the response requirements for them. The NFCC recognises the importance of this and that little currently exists in the sector in the way of recent guidance or support in producing an IRMP.

The NFCC believes that the IRMP lays the foundations on which the fire and rescue services' prevention, protection and response activities are built on to ensure public safety. Any such guidance and support in developing an IRMP should be evidence-based.

The NFCC has commissioned a new Community Risk Programme to assist in fulfilling our strategic commitment '*Assessing Community Risk*'. The programme will provide a comprehensive, evidence-based and accredited risk analysis toolkit, which will enable a consistent approach to community risk management, enabling fire and rescue services to focus resources on activities where they will have the greatest impact: reducing risk and vulnerabilities within their communities.

The NFCC Strategy can be accessed [here](#).

The Community Risk Programme's vision is: *"To produce the evidence-based toolkit of choice for assessing fire and rescue-related risk and vulnerability, to contribute towards improving the safety, health and well-being of communities and to be an enabler for economic prosperity across the United Kingdom."*

When developing the toolkit, the programme objectives will be to:

- Recognise that local service delivery will be in partnership with public, private and volunteer services to meet the needs of both local communities and achieve national benefits.
- Consider the fire and rescue service role in reducing a broad spectrum of risks, beyond fire, including those that relate to health, safety, economic well-being and social mobility.
- Recognise the economic and business impacts of fire service activity and, by safeguarding people, places and infrastructure, the contribution made by the fire and rescue service to ensure economic growth locally and nationally.
- Provide tools appropriate to assess risks in the widest variety of contexts, applicable across the UK, and to determine the root causes of those risks.
- Identify the best ways to reduce or mitigate identified risks, including by changing the perceptions and behaviours of people and communities.
- Provide effective tools for assessing and reducing risk, that are applicable to the work of every fire and rescue service in the UK, allowing for evaluation of outcomes in relation to risk controls.

The NFCC believes that references to IRMP in the draft framework should reflect and reference this work in anticipation for the objectives to be delivered within the lifecycle of this framework. This is consistent with the framework's references the NFCC's People Strategy under Section 6 (Workforce) and the need for fire and rescue services to reflect the principles laid out within it.

Such references would add value to the national framework through:

- The promotion of a high quality and ready-made toolkit which allows for a comprehensive and consistent application of risk analysis to inform a fire and rescue authority's risk management planning through the IRMP.
- Assurance on the quality and consistency of the risk analysis which informs a fire and rescue service's IRMP.
- Improved outcomes for people served by the fire and rescue service.
- A reference document which can be used by both Government and Her Majesty's Inspectors of Constabulary and Fire and Rescue Services to inform their understanding of the IRMP process and best practice undertaken by UK fire and rescue services.

Grenfell Tower

The NFCC is monitoring the work (and outputs) arising from the Grenfell Tower tragedy, specifically from the Public Inquiry and Dame Judith Hackitt's review. Raised expectations

of fire and rescue services' core protection functions, including any enhanced role within the regulatory environment, must be accompanied by the requisite funding.

Inspection, Accountability and Assurance

The NFCC supports the development of Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS), and the framework's focus upon accountability and assurance. These are necessary and positive features of well-functioning public services.

However, the focus on the Police, Fire and Crime Commissioner (PFCC) governance model is unbalanced, and risks creating different expectations for differently governed fire and rescue services. The need for clarity over the requirements of the different models is important, but this imbalance is mirrored in different sections of the framework – for example, there is a lack of acknowledgement of the discrete features of the county council model.

Governance

The NFCC supports the clearly articulated role of the Council as the co-ordinated professional, operational and technical leadership of the sector, replacing the Chief Fire and Rescue Adviser's Unit. It also supports the focus on the need for clear strategic plans for fire and rescue services, and the new focus on the Chief Fire Officer. However, the wording originally agreed with the National Framework Working Group regarding Chief Fire Officers is considered to be better and more likely to achieve the desired outcome – a long-established outcome achieved in police services. The NFCC recommends that the originally agreed wording (as below) is re-introduced at paragraph 4.7:

“Fire and rescue authorities should provide their Chief Fire Officer with operational independence and allow them to deploy their staff and resources to deliver the statutory functions of the authority and the integrated risk management plan. The fire and rescue authority should give due regard to the professional advice of the chief fire officer when making decisions affecting the operation of their fire and rescue service.”

Achieving Value for Money

The NFCC welcomes the draft framework's focus on value and efficiency, and the framework's explicit acknowledgement that response resources must be within the context of the risks faced by communities.

Reserves

Reserves are an important tool in planning and maintaining financial stability over the medium term. The NFCC recognises the need to be transparent about the size and purpose of reserves, as they represent a significant use of taxpayers' money. However, the publishing of policies and strategies, in addition to the medium term financial planning process, published accounts and the requirement to publish an annual assurance statement, would be an unnecessary additional burden on fire and rescue services. It is unclear how the reserves levels of the different governance types of fire and rescue authority will be considered as an output from the aggregation of this data. For example, the risk factors posed by fire and rescue-related matters to a county council result in a very different financial consideration then to, for example, a combined fire authority.

There is also concern around the degree of analysis required, in particular, the level of breakdown suggested in paragraph 5.9. Some of this is likely to be covered in the policies and strategies, but details covering what is contractually committed could be misleading.

For example, funds for the refurbishment of a fire station in two years' time will not be contractually committed until the design and procurement processes (etc.) are complete. But, this does not diminish a fire and rescue service's commitment to such work. It therefore is questionable as to the value of this analysis.

The NFCC is working with the Somerset Technical Support Team in designing a survey for completion in summer 2018 that will gather information on general and earmarked reserves in a consistent way. That should allow better analysis than might be available by trying to extract data from individual service websites and documentation. The NFCC will produce a position paper using that data to inform future funding discussions.

To this end, rather than specify detailed requirements in the National Framework, the NFCC would like to use this as an opportunity to work with the Home Office in designing the survey and sharing the data. This approach is likely to provide more detail in terms of breakdown and supporting narrative than would ordinarily be included in fire and rescue service strategies. It is currently planned that this exercise would be repeated annually thereby allowing the identification of trends over time.

Decisions regarding reserves are local matters, and different governance structures will have different approaches (e.g. county council fire and rescue services may have council-wide frameworks to work within). As such, the NFCC believes this is a more positive approach to this matter than an overly prescriptive expectation in the revised framework.

Collaboration

The NFCC supports the new Duty to Collaborate and the opportunities it provides emergency services to improve their efficiency and operating models. The work of the cross-sector Emergency Services Collaboration Working Group (which is developing toolkits and guidance to support collaboration) directly supports the Duty and the intent behind this section of the draft Framework.

However, the inclusion of intraoperability and interoperability references within the '*Achieving Value for Money*' section misrepresents their purpose. Joint Emergency Services Interoperability Principles (JESIP) and the associated tools and frameworks were developed in recognition of a need to improve the management of the interface between different Category 1 responders at the incident ground – they are fundamentally operational in nature and should not be presented as a means of efficiency. The NFCC recommends including references to the adoption of National Operational Guidance as a means of improving intraoperability, while moving these sets of references to Section 2.

Workforce

The NFCC supports the promotion of the NFCC People Strategy and its principles, and the development of new professional standards for the fire and rescue sector. The NFCC discussions with the Home Office have been very positive and constructive – that professional standards will be commissioned through the NFCC and its delivery frameworks – ensuring that:

- standards are of the highest quality
- Appropriate links between IRMP and Workforce work led by the NFCC can be drawn with new professional standards
- that standards benefit from the best and most current fire and rescue expertise
- that the NFCC is in a position to support their implementation, including through:
 - co-hosting within a common publishing portal alongside National Operational Guidance and other NFCC materials
 - promoting new standards and any appropriate training and development opportunities and materials through NFCC digital channels, conferences and workshops; and appropriate training frameworks (such as Executive Leadership Programme).

The NFCC believes that the Framework's references to standards should not be in the Workforce section of the Framework, in acknowledgement that standards may be commissioned for a range of areas of consideration for fire and rescue authorities,

including operations and governance. It is recommended that this section is redrafted to reflect the agreements between the Home Office and NFCC in this regard.

Re-engagement of senior officers

The NFCC supports the principles of fairness and transparency in the appointment of senior public servants, which are at the heart of paragraphs 6.6 – 6.10. However, it is recognised that retired individuals have the same entitlement under the law to apply for, and be assessed for, openly advertised roles as any other individual. It is unclear to the Council what legal framework would allow fire authorities to disregard the applications of (presumably) highly qualified and experienced applicants.

It is also notable that the same proposed constraints are not put upon Chief Constables (nor the Metropolitan Police Commissioner). Under the draft Framework, a PCC might appoint a retired Chief Constable with an appropriate abatement in pension payments, but the same PCC would not be able to appoint a retired Chief Fire Officer with the same appropriate abatement.

National Resilience

The NFCC supports the roles and responsibilities relating to National Resilience described by the draft Framework and delivered through the NFCC National Resilience Hub at Merseyside Fire and Rescue Service.

However, the draft Framework makes reference to meeting *‘the full range of service delivery risks and national resilience duties and commitments that they face’* during a period when business continuity arrangements are in place. This misunderstands the nature of being in a business continuity delivery state. It also misunderstands the nature of the fire and rescue workforce, which retains the uncontested right-to-strike. There is no replacement fire and rescue service available in the private or public sector that can meet *‘the full range of service delivery risks and national resilience duties and commitments’* faced by fire and rescue services.

Intervention Protocol (Annex A)

The NFCC notes the protocol.

Other comments

The NFCC has no other comments to make in relation to the draft Framework.

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Consultation Response – National Framework for the Fire and Rescue Service in England

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If you are a representative of a group, please tell us the name of the group and give a summary of the people or organisations that you represent.

The National Fire Chiefs Council represents the United Kingdom’s fire and rescue services through its council of Chief Fire Officers, its nine co-ordination committees, and its full-time elected Chair, Roy Wilsher.