

Draft Fire and Rescue National Framework for England 2018

Cheshire Fire Authority Consultation Response

Cheshire Fire Authority welcomes the opportunity to comment upon the draft of the revised National Framework. It welcomes the fact that the Minister has emphasised the importance of community protection and prevention work and the difference that fire and rescue staff can make to wider community health, safety and wellbeing issues.

This work has made a significant impact on reducing the number of fires and has enabled Authorities to work with partners to deliver improved outcomes for local people; not just in relation to fire but in other areas as well, as seen in Cheshire through the delivery of Safe and Well visits whereby firefighters and advocates provide health information to residents.

As referenced within the Minister's foreword, the landscape of fire and rescue continues to undergo considerable change and it appears prudent to produce a revised Framework which refers to new developments such as the formation of Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS), the development of the National Fire Chiefs Council (NFCC) and the wider reform agenda.

Delivery of Core Functions

The reference to targeting prevention and protection activities within this section are appropriate, as effective targeting can ensure resources are used efficiently and effectively towards addressing those most at risk. FRAs already undertake innovative work in collaboration with partner agencies to improve outcomes for their communities. Regarding the expectation on FRAs to work closely with other organisations, it would be beneficial to highlight any reciprocal expectations upon other services to undertake similar risk reduction initiatives.

Specifically regarding risk based inspection programmes for enforcing compliance with the provisions of the Regulatory Reform (Fire Safety) Order 2005, current usage of the CFOA risk based inspection programme is embedded when undertaking audit and data collection procedures. Further clarification on how local risk-based inspection programmes would sit alongside existing methodology and national approaches to targeting would be beneficial.

In addition, the draft Framework does not refer to FRAs working with businesses to provide support in complying with fire safety legislation. Instead paragraph 2.3 only refers to a broader promotion of fire safety. Nor is there reference to the Primary Authority Scheme, within which FRAs are engaging in order to provide a efficient and standardised approach to fire safety for the businesses they partner with.

Inspection, Accountability and Assurance

It is helpful that the role of independent inspection by HMICFRS is outlined in relation to assurance and improvement. It is welcome that the Framework commits the Home Office and HMICFRS to work together to align data requirements.

The accountability requirements as outlined in section 3.12 are already embedded within Cheshire through existing structures such as Committee system, integrated risk management planning and consultation cycles.

Governance

With the development of the role of Police and Crime Commissioners (PCCs) and directly elected Mayors, there are now several different governance models regarding fire and rescue. It is welcome that requirements relating to PCC FRAs are referenced within the Framework, however it may be beneficial to also consider particular governance requirements relating to other models where appropriate, including mayoral models.

Integrated risk management planning is an established methodology utilised by FRAs and requirements relating to such activity are outlined within section 1 of the draft Framework. It is unclear how the production of a fire and rescue plan and fire and rescue statement by PCC FRAs will dovetail with the requirement to produce an IRMP, without creating unnecessary duplication.

The recognition of the professional role of the NFCC in the provision of sector-led leadership and advice and support to local and central government is welcome.

Achieving Value for Money

The Authority makes a determination on the level of general reserve held based on local corporate and operational risks. Indeed, the Authority undertakes a regular programme of robust internal and external audit across its business functions to be assured of the delivery of economy, efficiency and effectiveness in its use of resources. The use of reserves is a key part of the Authority's medium term financial planning to address particular risks and spending priorities. It would be helpful if this section of the Framework provided reflection of the local variation in risks and other factors that contribute towards a determination on an appropriate level of general reserve.

The commitment to local discretion and determination regarding the duty to collaborate with emergency services partners is welcomed, as it is of course the local FRA and partners who are best placed to consider and put in place collaborative arrangements to benefit the local community.

Reference to collaboration in respect of intraoperability and interoperability appear largely unchanged from the previous Framework, with the exception of updates to reflect Lead Authority governance structures and Joint Emergency Services Interoperability Principles (JESIP). However, it may be more appropriate to include this within the 'National Resilience' aspect of the Framework, rather than the 'Value For Money' section.

The expectation that FRAs engage with national research and development programmes is noted, though this should not discount work undertaken at local and regional levels both between FRAs and indeed with other partner agencies or bodies.

It is helpful that there is an expectation that emerging good practice should be shared in order to develop sector learning.

Workforce

The proposed content within the requirement to put in place a people strategy addresses a number of significant workforce reform issues that, if approached effectively can lead to a positive transformation of the fire and rescue sector nationally. However, given the scope of the content referenced, it is possible that several issues would go beyond a narrow definition of a single people strategy and may instead be found in a suite of strategic documents and frameworks.

The Framework highlights that the policy of establishing a professional standards body is under development and an announcement likely to be made before the publication of the final Framework. It would be beneficial to understand whether any element of the standards will be included in the Framework or a subsequent appendix once finalised.

National Resilience

Regarding gap analysis of national resilience capabilities, the previous Framework referenced that where there is a gap that needs to be filled, if necessary - and where appropriate - this will involve funding of new national resilience capabilities, in line with the new burdens doctrine. Though the Framework outlines steps which may be taken to address such gaps, greater clarity on the funding of any gaps which do remain would be beneficial.

Intervention Protocol (Annex A)

The inclusion of an intervention protocol is helpful in understanding the role of HMICFRS and the sector as a whole in driving performance and in addressing instances where this falls below acceptable standards. Reference to the importance of sector-led support, assistance and improvement are welcome, as is the statement that the use of the power of intervention is seen as a last resort. The protocol strikes the right tone in placing responsibility for support with the sector and the political and professional leadership of the particular fire authority.

Other comments

It is welcome that the Minister has committed to update the new National Framework as required to ensure that recommendations from the Hackitt Review and the wider Public Inquiry into the Grenfell Tower fire can be captured and reflected.