

APPENDIX D TO REPORT DSFRA/18/5

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Date : 16 February 2018

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Dear Sir Thomas,

Re Proposed Fire & Rescue Service Inspection Programme & Framework 2018/19

Thank you for the opportunity to respond to the consultation on the 'Proposed fire and rescue service inspection programme and framework 2018/19' document. This was discussed by the Devon & Somerset Fire & Rescue Authority at its meeting on Friday 16 February 2018 and I have been asked to forward this response on behalf of the Authority.

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?

We think that the approach is sound and would like to suggest the following points;

- Although point 2.1.6 of Annex A mentions collaboration within the fire sector and beyond the fire sector, there is no specific mention of intra-operability or collaboration beyond Blue Light Services on page 6 or elsewhere within the document. We consider this key to maximising efficiency in the delivery of services and should not be limited to police and ambulance.
- The document explains the use of graded judgements, value for money and the ability for the public to judge performance in relation to other services. In the absence of a current set of performance standards, across the sector, we suggest that HMICFRS publish a list of the guidance, standards and documents that they will be using for the graded judgement process to ensure commonality of approach across all services.

- Additionally, we would suggest that HMICFRS publish their pre-defined grading criteria to improve understanding of what 'good' looks like, what 'outstanding' looks like.
- If HMICFRS has access to national data relating to average cost by service type (e.g. cost of domestic fire, cost of statutory inspection, cost of home fire safety visit), publishing this information and its calculation methods would enable an initial benchmark for services. We would suggest that such data reflects the differences of urban and rural fire and rescue services.
- Sharing of the assessment framework used by HMICFRS inspectors would be useful to ensure services understand the pre-defined grading criteria.

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?

Yes, we agree that this is better for the initial round of inspections and would also welcome thematic inspections as a result of the initial round, in order to share best practice and deliver improvements in key areas.

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

No, the proposed methodology should give a broad overview of services nationally and identify common areas for improvement, standardisation and best practice.

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?

Yes, the document includes the right questions. Annex A could be improved by including an example of what 'good' looks like, what 'outstanding' looks like in the case of each question.

Annex A appears to focus upon 'core legislative business' and given that this is the first inspection for HMICFRS, establishing a baseline across services with this focus is a sensible approach, however, it would be useful to also ensure that innovation and collaborative activities which lie outside of core areas are similarly assessed as part of the inspection, therefore questions relating to non-core areas would be an improvement suggestion.

Further detail relating to the inspection process underlying Annex A would also be useful (e.g. inspectors handbook) as this would aid transparency, speed the process of inspection, remove uncertainty (given that this is the first inspection round and there is some uncertainty over what to expect) and quantify in further detail the factors which HMICFRS are seeking.

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?

We would suggest that taking a more direct approach to feedback from the communities we serve might provide an additional way to acquire information relating to satisfaction levels. The use of technology to establish consistent, central data collection hubs for 'quantitative data across all services, as per Incident Recording System (IRS), against common performance measures. This might include sickness absence data, home fire safety visit completion, statutory fire safety inspections, workforce diversity etc. If we were all being asked the same questions and provided information in the same way, it would allow significantly more realistic benchmarking on an ongoing basis and would allow us to seek and identify best practice. Consistent capture of data which underpins Value for Money information would also be of benefit to the sector.

HMICFRS consideration of access to data and data sharing with partners is crucial.

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

- Increasing workloads from supporting health/ambulance, insufficiently funded and with inconsistent governance.
- Cyber security and risks posed by partnerships e.g. Emergency Services Network, joint controls etc., together with the impact of GDPR compliance.
- Demand management and non-statutory support for partners – particularly Ambulance.
- The provision of fire and rescue service response in rural areas due to changing employment profiles and availability of on-call staff.
- Increasing number of severe weather events.
- Lack of funding for non-statutory response e.g. flooding, emergency medical response, bariatric patient removal.
- Additional workload and policy change arising from decisions made by government departments e.g. HMRC changes to the taxation of business assets
- Possible impact of Brexit
- Interim recommendations suggest that there will be potential outcomes from the Grenfell Towers Inquiry and the Review of Building Regulations and Fire Safety by Dame Judith Hackitt that will result in additional workload for FRS

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

In the absence of a current set of performance standards, across the sector, we suggest that HMICFRS publish a list of the guidance, standards and documents that they will be using for the graded judgement process to ensure commonality of approach across all services.

Additionally, we would suggest that HMICFRS publish their pre-defined grading criteria to improve understanding of what 'good' looks like, what 'outstanding' looks like.

If HMICFRS has access to national data relating to average cost by service type (e.g. cost of domestic fire, cost of statutory inspection, cost of home fire safety visit), publishing this information would enable an initial benchmark for services. We would suggest that such data reflects the differences of urban and rural fire and rescue services. A common approach to outcome measurement particularly regarding preventative activity would be most welcome.

Sharing of the assessment framework used by HMICFRS inspectors would be useful to ensure services understand the pre-defined grading criteria.

Having been informed that HMICFRS will carry out field work visits and 'reality testing' including visiting service stations, consideration should be given to ensuring that conclusions are not drawn for a whole service, based upon an individual station visit. This Authority ask that a fully representative sample of a service is taken, particularly recognising the spread of geographically large services with often rural dispersed populous, versus high density services with high populous and often geographically smaller spread.

I would be grateful for confirmation of receipt of this response and look forward to publication of the final document.

Yours sincerely

Glenn Askew
Chief Fire Officer