

Proposed HMICFRS fire and rescue services inspection programme and framework 2025–27 for consultation.

Response from

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- 1. We propose to evaluate how each FRS is affected by its fire and rescue authority's governance, oversight, and scrutiny arrangements. We also propose to examine how the fire and rescue authority supports the FRS to keep the public safe, establish a positive culture and standards of conduct, and look after the health and well-being of its staff. Do you agree or disagree with this proposal?**

We strongly agree with this proposal which would make the assessments of performance more comprehensive and holistic and would significantly develop the inspections from essentially a service or operational inspection into a (more) corporate or institutional inspection, although to be fully comprehensive and strategic you would also have to include an appropriate assessment of the short-, medium- and long-term use of resources and the sustainability of the organisation. Although we would like to see the latter characteristics included in the methodology and subsequent inspections and reports and have called for this to be part of the methodology for some years we consider the proposal as a significant step in the right direction. (Please also see our response to question 3 and 4 about working with local communities).

The development of the methodology reflects the equivalent stages in the development of Inspection regimes under previous Local Government and Fire and Rescue Service Inspections. The antecedents to the introduction of Best Value were pre-existing service specific inspections in Education (Schools and Ofsted), Social Services (SSI and CSCI), Benefits (BFI) Policing (HMIC) and Fire Services (HMFSI) which were integrated to an extent in the first Best Value Regime before later being integrated into the first and second phases of the Comprehensive Performance Assessments (CPA) and later the Comprehensive Area Assessments (CAA) (Murphy and Greenhalgh 2018). It also reflects the development from service to comprehensive of performance inspections in other locally delivered public services e.g. Local Health Trusts (Murphy *et al* 2019).

Nearly all external performance inspections started as service or operational inspections and (if they persisted) later developed into corporate inspections so that they could make a corporate and strategic assessment of the performance of the whole organisation, including its leadership, governance, and organisational culture. In the past this has also provided the government with a much more robust evidence base for both individual services improvement and in cases where central government are considering the use of intervention powers either under the Local Government Act 1999 or (in most FRS cases) the powers under the Fire and Rescue Services Act 2004 as currently interpreted by Section 7 of the 2018 National framework and Annex D which is the current protocol on Central Government Intervention Action for Fire and Rescue Authorities. In the period between 2001 and 2003 they were particularly useful to the government in defending Judicial Review challenges from those authorities unhappy with the process or outcome of an external inspection.

The step up to implementing corporate inspection (e.g., within CPA) proved difficult for central governments because MPs and Ministers essentially rely on local politicians to assist with their own election campaigns and vice versa. Ministers in the early years of CPA between 2002 and 2005 were therefore reluctant to impose independent external inspection onto the performance of local politicians. It was the early lessons from the Interventions arrangements in poorly performing local authorities (Including 3 pilot interventions) that demonstrated to the government that it was necessary to assess leadership, strategic performance, and collaborative performance as well as operational performance in order to strategically 'turn-around' the performance of poorly performing or failing authorities and to make their recovery sustainable.

We amongst others have been advocating the merits of corporate inspections and the move from service to corporate inspections since Bob Neil as Fire Minister announced a "Strategic Review of the sector and the 2008 national framework" in 2010 (Murphy and Greenhalgh 2011).

2. Do you agree or disagree that we should assess leadership at all levels of FRSs?

We agree that HMICFRS should assess leadership at all levels of FRSs – in our experience of teaching and researching leadership and in particular leadership in Fire and Rescue Services and the emergency services, leadership is both important and (crucially) different at strategic and operational levels and has to be different when responding to incidents and emergencies that place staff into dangerous contexts as opposed to other areas of service such as prevention and protection. Leadership needs to be conceptually and in practise very different for those like firefighters working in dangerous contexts such as when responding to different types and complexity of incidents and emergencies. Prevention and Protection services require different types of leadership than for instance response.

Similarly, the demands and skills of strategic and long term-leadership may overlap but they are clearly not the same as day-to-day operational leadership. From our research and experience (and to be more transparent to the services to be inspected) we consider that the three levels of leadership that would be most suitable for inspection are strategic leadership, operational leadership and frontline leadership of stations and watches. One essential part of all of these is incident command which affects all levels of leadership in Fire and Rescue Services (see Wilsher 2019).

3. We intend to combine the current efficiency questions 2.1 and 2.2 into a single question. This would concentrate on how resources are allocated and used in support of the outcomes required for the community risk management plan. Do you agree or disagree with this proposal?

We agree with the proposal to combine the current 2.1 and 2.2 questions and ask how resources are allocated and used in support of the outcomes required by the services community risk management plan. As you say this will be both a useful improvement to the methodology and help to focus more on outcomes for communities and the workforce.

Ideally, as can be seen from our response to question 1, we would like to see the methodology include an appropriate assessment of the short-, medium-, and long-term use of all of a services' resources in order to get a fuller appreciation of the services sustainability and its financial and organisational resilience. We do however recognise and appreciate that the current proposal would be a significant step towards this long-term objective.

4. We propose to examine how FRSs work with local communities to make them more resilient. Do you agree or disagree with this proposal?

We do agree with this proposal. The ultimate objective of FRS is to improve the safety of the public and to make individuals and local communities more resilient. A key aspect of this requires Fire and Rescue services to collaborate with key stakeholders and partners such as the other two blue light services and the local authority and members of the local resilience forums. In the long run it is also more economic, efficient, and effective if local public services work with local communities rather than assuming they know what the local community either wants or needs as well as knowing the risks or threats to individuals and communities.

Local communities are demonstrably becoming more diverse and have ever changing patterns of risks, wants and needs. In order to provide better services which, help make them safer and more resilient, FRS need to know, understand and to a degree reflect their local communities. As the Grenfell Inquiry has shown (Moore-Bick 2019, Moore-Bick, Akbor and Istephan 2024), if local communities are to be made or make themselves more resilient, local FRS will have to work with both the community and its current key collaborators most importantly the local authority, the police and ambulance services and other members of the local resilience forums. How effectively local services plan for and train to respond to local and more complex incidents and emergencies is an important element of their prospective accountability that the government and the public have a right to expect as part of their public assurance arrangements.

We strongly agree FRS should assess and keep up-to-date, local Community Risk Registers, which are integral to the services work to safeguard individuals and communities. They should all be demonstrably active participants in the local resilience forums and use risk assessments to develop plans and support local communities to help make them more resilient.

5. Does the draft 'characteristics of good' (Annex A) include the right questions to gather evidence for a comprehensive assessment of FRSs? How could this be improved?

In relation to the stated intentions of the consultations proposals these appear to have been skilfully 'translated' into the draft 'characteristics of good' that are spelt out in Annex A. In particular we recognise the proposals include significant improvements relating to assessments of services use of finances. Ideally, we would like to see more explicit inclusion of definition and references to short (e.g., up to 2 years) medium (3-5 years) and long-term (5-10 year) financial and resource planning (including HRM, Leadership Development and Asset management).

6. To expand some areas that we currently inspect and/or include new areas for inspection, we would need to reduce or remove some of those currently considered. What do you think we should spend less time on?

As data and information continue to improve and if resources continue to be tightly constrained by the government one alternative would be to move to a longer cycle for future inspections.

At an appropriate stage HMICFRS might also consider moving from the strict universal assessment methodology and cyclical inspections and consider proportionate inspections such as a light touch inspection for consistently good performers or a deep dive into a particular theme or aspect of service

for those persistently falling down on particular aspects of the service, such as equalities, diversity, inclusion, and/or organisational culture.

We would wish to record our agreement with the recent changes to the current round of Inspections to include an 'adequate' grading category and welcome the accelerated reporting of causes for concern and look forward to seeing how much impact these will have on the assurance process.

7. Is there anything we can do to improve the way we report our findings?

It is good to hear that the monitoring portal will be made accessible to all FRS – in addition to the benefits of greater access this will help with systematic improvements amongst services generally. You might also consider making access to the portal available to other agencies that are part of the regulation and assurance regime of FRS such as their external auditors.

Individual Inspection reports, the annual State of Fire and Rescue and the Spotlight reports are commendably articulate and clear as individual reports however with the number of reports now available means improvements to the layout and functionality of the website and its search features, together with links for example to the Standards Boards or local audit reports would be welcome.

The standards Board was established primarily to develop *professional* standards although at times there has been pressure for the Board to develop what are effectively *performance* standards for the service. At some stage we envisage the government may ask the inspectorate to look at establishing and reporting on other metrics such as Key Performance Indicators (hopefully developing these in collaboration with key strategic stakeholders such as NFCC, LGA, etc. In 2023 the previous government established the Office for Local Government (Oflog) as the body responsible for assessing and improving the performance of local government in England and it has developed a relatively simple data explorer tool but as yet has no information available on Fire and Rescue Services (other than indirect information on single county-based Fire and Rescue Authorities). The current Minister has also written to Oflog informing its CEO of his intention to review the role of Oflog by the end of 2024.

8. Are there any areas that you think we should examine more.

We accept that the proposals will encourage improvements in partnership working and strategic collaborations but suggest that more explicit mention(s) of this objective would have been welcome as a remainder to the services.

We recognise this is primarily a matter for the government but with the implementation of this new methodology and an improving evidence base a more robust Monitoring and Intervention regime could be appropriate than the regime currently laid out in Section 7 and Annex D of the current national framework which includes the current protocol on Central Government Intervention Action for Fire and Rescue Authorities.

Finally, as both mentioned and implied above, we would have liked reference to short-, medium- and long-term use of resources and in particular financial resources.

References

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