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Fire and Rescue Framework for Scotland 2016

RESPONDENT INFORMATION FORM

Please Note this form **must** be returned with your response.

Are you responding as an individual or an organisation?

☐

☐ x Organisation

Full name or organisation's name

Joint Universities Emergency Services Research Programme (The Joint Universities Programme is a member of the Fire Service Federation)

Phone number

0115 848 8092 or 0777 587 7949

Address

c/o Mr Peter Murphy Director of the Public Policy and Management Research Group Nottingham Business School, Nottingham Trent University Floor 9, Newton Building, Burton Street, Nottingham Pete Murphy profile available at: http://www.ntu.ac.uk/apps/staff_profiles/staff_directory/124630-0/26/peter_murphy.aspx

Postcode

NG1 4DU

Email

Peter.murphy@ntu.ac.uk

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

☐ Yes - Publish response with name of the joint programme or Peter Murphy

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

☐ Yes

General Comments and Preamble to more specific comments.

1.1 We wish to contextualize our later, more specific, comments by submitting the following general views on the new framework overall.

1.2 The draft framework combines a clear strategic approach with a convincing narrative. It is clearly the product of 'joined-up' policy making and should therefore facilitate integrated public service delivery. It embraces holistic system-wide thinking and applies this to both the emergency services and to wider public services in Scotland and demonstrates a 'strategic' and 'integrated' approach to the planning, governance, improvement and delivery of modern public services.

1.3 We believe the current draft framework is a clear improvement and more fit-for-future purpose than the existing predecessor framework in Scotland. We also believe it is superior to the third National Framework for England 2012, and also the more comprehensive predecessor the second National Framework for England 2008-2011 published in 2008. It is also superior to the equivalent Welsh framework.

1.4 Over the last two years' members of the Joint Research Programme have been *inter alia* undertaking a series of comparative studies between the service in Scotland and the service in England, particularly since the devolution of powers and the recent Police and Fire Reform programme in Scotland. We are also aware of on-going emerging research on comparing the Welsh FRS experience.

1.5 We would be very happy to discuss our emerging findings with the Fire and Rescue Division or the Scottish Service, if you think they may be of use or interest to yourselves.

1.6 Members of the team have also been providing a series of reports and commentaries to the National Audit Office in England on the public assurance, accountability and transparency of locally delivered public services since 2010, which have included the 3 blue light Emergency Services and in particular the Fire and Rescue Services. We would be happy to discuss findings, lessons learned and recommendations from these studies if they are of use or interest to the Division.

Comments on the 'Introduction and Context' section.

2.1 Although we acknowledge that the draft framework is a timely improvement on its predecessor (which, in our opinion, was more of a transformation plan and change strategy than a national framework), it is also a much better basis for producing the next strategic plan for the service. There are however, a number of detailed or relatively minor areas where we believe it could be improved. Some of these revolve

around the consideration about what is appropriate for a national framework and what you might reasonably expect to appear in the strategic and/or operational plans developed from the framework.

2.1 Although page 2 states, and summarises in bullet points, the 4 most relevant National Outcomes, this crucial policy context could be better presented with a little more explanatory narrative. It is clearly the second and fourth of these national outcomes (Nos 9 and 16) that are most directly relevant for the framework and the FR Service but, by adopting the numerical order that they appear in, the current presentation underplays their individual importance and ironically the collective importance of all four. An alternative narrative may deal with 9 and 16 and say how they builds upon and support National Outcomes 11, and ultimately, 6.

2.2 The words 'the strategic planning' should be added to the statement identifying the main purpose of the SFRS, on page 2, in our view before the words 'prevention, protection and response…'

2.3 The next paragraph on page 2 could also usefully include the requirement to investigate opportunities to benefit communities as well as identifying and mitigating risks facing communities.

2.4 We strongly support the assumption that the creation of the single service is part of an on-going process and the explicit commitments to build on the four pillars of Christie (page 3) as well as the adoption of an evidenced led approach to changes and improvements to the service. There has unfortunately been a retraction from an explicit evidence led approach in England as well a move away from 'evidenced based policy making' to 'policy based evidence making' in public policy in England. Fire and Rescue Services for various historical and legal reasons have generally been an evidenced led service and we welcome the recommitment to this approach and the reassurance it provides to stakeholders.

2.5 We welcome the clarity and the content of the section on the 'changing context for the SFRS' on pages 3 -5. As with the other parts of this introduction and context section, it provides the public with assurance as to the nature and purpose of a changing service and the key challenges the government believes it is facing. This is necessary for public assurance, accountability and transparency reasons but is also essential for internal and external scrutiny of policy, practice and performance.

SPECIFIC CONSULTATION QUESTIONS

1.   Do you agree with the 10 strategic priorities attached in **Annex A** to the Fire and Rescue Framework for Scotland **2016**?

  Yes - subject to some minor amendments and an omission.

We agree with the principal of setting the strategic priorities out in the framework and we agree with the vast majority of their content.

We believe that some are excellent as drafted (e.g. Strategic Priority 9) but there are minor drafting or wording improvements that could be made to others (e.g. 2,3,6 and 10) and we are not convinced that 8 (Unwanted Fire Alarm Signals) is appropriate for a national framework, as opposed to a strategy or operational plan.

The issue of reducing false alarms is clearly capable of being covered under Strategic Priority 1 Performance Measures to support the strategic plan and it appears more of an issue for a strategic or operational plan for the service.

We will identify potential wording changes (including suggested changes to the Strategic Priorities) in our responses to the various individual section given below.

2.   Do you agree with the text set out in the sections **Protecting Communities** and **Prevention and Protection**, in Chapter 1 of the Fire and Rescue Framework for Scotland **2016**?

Yes – subject to minor amendments

We agree with the text in general but would have preferred the stronger more precise obligation to 'lead and manage continuous improvement' to be included within this section as and where it is appropriate. In a few places, phrases such as 'continue to fulfil'; 'has a role'; and 'fully contribute' are used which are not as dynamic nor as reassuring about the service being proactive.

Although we accept the lead and manage phrase will not always be appropriate particularly in contexts where there is mutual and several responsibilities and/or where FRS are clearly not the appropriate service to lead on an issue.

3.   Do you agree with the text set out in the section, **Responding to Incidents**, in Chapter 1 of the Fire and Rescue Framework for Scotland **2016**?

Yes - subject to minor amendments.

We would prefer the phrase 'economic, efficient and effective' to be used whenever it is appropriate rather than relying on one of the three elements of the former Audit Commissions definitions. Thus, we would prefer a commitment to an economic, efficient and effective emergency response to fires and other incidents, as central to the purpose of SFRS on page 8 rather than just an effective emergency response.

We would also prefer to see the phrase 'continuously improve and regularly review' included in Strategic Priority 3 rather the just the word 'evolve' (page 9).

We particularly commend the use of 'optimal' in this Strategic Priority. In a dynamic multi variate and multi-agency environment optimisation (of inputs, outputs and/or outcomes) is often the most appropriate objective.

4.   Do you agree with the text set out in the section **Managing Risk**, in Chapter 1 of the Fire and Rescue Framework for Scotland **2016**?

Yes - subject to minor amendments

As assessing and managing risk is so central you may consider a little more narrative might be helpful for the public. The pattern of risk and the response to risk is driven by a gravity model for buildings and premises and individual and community risks assessments embedded in the IRMP process for domestic dwellings. As risk patterns change almost continuously a commitment to regular review would also seem appropriate in this section.

There are good commitments to information sharing and management in this section (page 9). but it doesn't say how and where the information will be made available. It also doesn't mention independent scrutiny and improvement although they are both strongly implied.

Risk registers and response are generally 'nested' integrated at local regional and national levels – mention of this on page 10 would help provide reassurance to the public.

The pattern and nature of risks are of paramount interest to the insurance industry - who are clearly a key stakeholder for the service yet they are not mentioned in this section (or anywhere else in the framework)

5.   Do you agree with the text set out in the section, **Evidence Based Decision Making**, in Chapter 1 of the Fire and Rescue Framework for Scotland **2016**?

Yes – subject to very minor modification

As mentioned above, we strongly support and applaud the commitment given in this section to evidence based decision-making. The one issue we would have with this section is the weakness of the phrase to 'work with partners to foster a common-sense approach to inter-agency data and information sharing'. The paragraphs on data sharing should be drafted on the assumed premise that relevant inter-agency data will be freely shared and agencies are under a duty to produce and facilitate the sharing of such data.

6.   Do you agree with the text set out in the section, **Working with Others**, in Chapter 1 of the Fire and Rescue Framework for Scotland **2016**?

Yes – subject to very minor modification.

There is an excellent explanation and logic to this section. Our only comment relates to investigating options for sharing premises, assets and services particularly with police and ambulance services. The framework could give an indication of which of the three organisations (Police, Fire or Ambulance service) that the government considers should take the lead on this issue over the next period? All three are facing considerable challenges so, in order to generate momentum on this issue, it might benefit all three if lead responsibility was established.

7.   Do you agree with the text set out in the section, **Local Flexibility**, in Chapter 1 of the Fire and Rescue Framework for Scotland **2016**?

Yes

This section might have mentioned/explained the considerable differences between the services in remote and island communities and those in Glasgow and Edinburgh. Our recent research has confirmed the improved relationship with COSLA and the Local Authorities mentioned in the excellent final paragraph of this chapter,

8.   Do you agree with the text set out in the section, **Driving Improvement and Realising the Benefits of Fire Reform**, in Chapter 2 of the Fire and Rescue Framework for Scotland **2016**?

Yes – subject to two minor modifications

> In Strategic Priority 6, our suggestion would be to replace the word 'tracked' with the more desirable 'publically reported', which we hope is self-explanatory.
>
> In an outcome based framework or strategy, 'benefits realisation' becomes part of the rationale for investment or policy direction rather than just a dimension of a project.

9.   Do you agree with the text set out in the section, **The Future Role of the Firefighter: Productive use of Capacity**, in Chapter 2 of the Fire and Rescue Framework for Scotland **2016**?

Yes – subject to minor modifications

> The first section (on page 15), refers exclusively to tangible assets. Some of the Fire Services most valuable assets are non-tangible assets such as its trust, reputation and the services relationship to the public – both locally and nationally. These also need maintaining if optimum use of capacity is to be achieved.
>
> While some mention of the OHCA strategy as an example may be justified– there is too much detail included in this section for a framework document.

10.   Do you agree with the text set out in the section, **Modernising Emergency Response**, in Chapter 2 of the Fire and Rescue Framework for Scotland **2016**?

Yes

> We are aware of on-going research at Nottingham Trent University into the operation of the Retained Duty System in England. You may find its outcomes of use or interest. The finding are currently emerging and should be available from June 2016.

11.   Do you agree with the text set out in the section, **Telecommunications Systems: Current and Future Use**, in Chapter 2 of the Fire and Rescue Framework for Scotland **2016**?

Yes

> None

12.   Do you agree with the text set out in the section, **Unwanted Fire Alarm Signals**, in Chapter 2 of the Fire and Rescue Framework for Scotland **2016**?

No

We are not convinced that this proposal – essentially developing a recording process and then taking steps to reduce overall numbers – is appropriate in the framework. It is clearly an important issue but more appropriate for the strategic and/or operational plans that will follow the framework.

13.   Do you agree with the text set out in the section, **Managing Performance**, in Chapter 3 of the Fire and Rescue Framework for Scotland **2016**?

Yes – with minor modification

The wording of Strategic Priority 9 is excellent.

The text needs to include a commitment to public assurance, accountability and transparency as these are necessary but on their own are not sufficient for an appropriate level of public assurance.

One of our members (Pete Murphy) has recently provided research and advice to the National Audit Office, on the public assurance, accountability and transparency (and the risks to services achieving value for money), being achieved by 'locally delivered' public services in England in 2010-2015.

These assessments and conclusions could be shared with the policy team if it is thought this would help the development of the framework. The locally delivered public services that were covered in the assessment for the NAO where, Local Government, Healthcare, Police and Fire and Rescue.

14.   Do you agree with the text set out in the section, **Developing Capacity**, in Chapter 3 of the Fire and Rescue Framework for Scotland **2016**?

Yes- with a minor modification

We are not sure that the phrase 'an employer of choice' is meaningful to anyone outside the professional community of interest. You may wish to use another phrase to get this point across.

15.   Do you agree with the text set out in the section, **Equalities and Human Rights**, in Chapter 3 of the Fire and Rescue Framework for Scotland **2016**?

Yes

Scotland is widely considered to be one of the most forward thinking administrations on these issues. It is therefore commendable that the framework acknowledges inadequacies and provides a strong framework and clear signposting for tackling these issues.

16.   Do you agree with the text set out in the section, **Community Empowerment and Community Planning** in Chapter 3 of the Fire and Rescue Framework for Scotland **2016**?

Yes

This is very clear and straightforward.

17. **Annex B** includes the 2013 Framework Targets and we would like to hear your views on whether these should be kept, dropped or amended. We would also like to hear if you think that any new targets should be added for example reduction of unwanted fire alarm signals or how better to measure the economic impact of nondomestic fires?

Our view is that targets and measures would be best included in the strategic and operational plans required of the service.

The governments priorities and the National Outcomes are very clear and are articulated in the frameworks Strategic Priorities. Strategic Priority 1 suggests a discussion/negotiation process to turn these into performance measures – which might include targets – although 'targets' are not the only way to achieve service improvements.

In fitting with a collaborative approach and inter-agency working an appropriate basket of targets and indicators would include a number of 'joint targets'.

The current suggestions appear to be very traditional, unsophisticated and exclusively quantitative targets. These would be clearly inadequate on their own, as they do not reflect the width and scale of the organisation services nor the ambitions and objectives of the service and its strategic stakeholders.

There is no real justification or explanation of how the possible targets have been arrived at or whether they are realistic, feasible or achievable. They look like the product of a process of counting what can be counted not 'counting what counts' Implemented in this form some are likely to be counter-productive.

Unlike the framework itself, which appears to be at the forefront of framework thinking and design and the shaping of policy to encourage delivery and improvement these

examples clearly do not reflect the latest thinking in performance indicators, measurement, management and monitoring. They likely to be interpreted as a reflection of top down command and control micro management from a discredited era that should have passed. (An issue highlighted by Audit Scotland in its 2015 report on the service.

A fully representative, sophisticated basket of indicators should be developed for 'nesting' into the strategic and operational plans already called for by the government.

The best way of assessing the impact of fires is to undertake a social return on investment type appraisal (this will be helped by engaging the insurance industry).

<div align="right">**ANNEX B**</div>

FIRE FRAMEWORK FOR SCOTLAND 2013 – TARGETS

1. Fire casualties
Reduce the rate of fire fatalities and casualties (excluding precautionary checks) per million population by 5% a year based on the previous 3 year rolling average.

2. Reducing special services casualties
Based on a 3 year rolling average, reduce the rate of casualties and fatalities per million population, each year.   Special services to be included: ☐ Road Traffic Collision;
- other transport incident;
- flooding;
- rescue or evacuation from water; and
- other rescue/release of persons

3. Reducing the number of accidental dwelling fires by 10% each year
Comparing a three year rolling average against the previous 3 year average, reduce the rate of accidental dwelling fires per 1,000 households by 10% each year.

Support the target with a measure of 'life risk accidental dwelling fires' – i.e. accidental dwelling fires where there was a casualty or fatality to show how the SFRS impacts the fires that matter.

4. Reducing the number of non-domestic fires
Reduce the rate of non-domestic fires per 1,000 in other buildings from the previous year.

5. Reducing firefighter injuries
Reduce the rate of injuries per staff member (headcount, including volunteers) each year.

Increase attendance – reduce the days lost to sickness so that SFRS at least matches the average of the best 4 pre-2013 fire and rescue services.

6. Improving attendance
Reduce the rate of injuries per staff member (headcount, including volunteers) each year.

Increase attendance – reduce the days lost to sickness so that the SFRS at least matches the average of the best four pre-2013 fire and rescue services.