



Working Paper 1.

The implications of the Crime and Policing Act 2017 for Fire and Rescue Services

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1. Background and Context

- 1.1. The Crime and Policing Act 2017 received Royal Assent on 31st January 2017. It is due for enactment in stages over the next year, but should be fully enacted by December 2017. It contains a number of proposals of direct and critical interest to the future of Fire and Rescue Services in England.
- 1.2. On the 7th February 2017 the Right Honourable Brandon Lewis MP, the Minister of State for Policing and the Fire Service at the Home Office, set out his vision for the fire sector in a speech to the think tank Reform.
- 1.3. This working paper is based upon information relating to the government's position at that time. It will be developed in future versions as more information becomes available.

2. Purpose of the working paper

- 2.1. The purpose of this working paper is to identify and set out the key issues for Fire and Rescue Services, as enshrined in the 2017 Act and subsequently interpreted by the Minister, with a view to helping to inform and develop a response from the Fire and Rescue Sector (or individual organisations and interests within the federation), to the emerging details of the new governance and accountability regime anticipated by the Act as elucidated and detailed by the Minister.
- 2.2. At a recent meeting of the Fire Sector Federation (FSF) held at Portcullis House on the 8th February, immediately after the Minister announcement, it was recognised that, while both the Act and the Ministers speech, identified some initiatives, principles and actions that the government are clearly intending to implement, there is a considerable amount of discretion available as to exactly what, how and when, some of the proposals are translated into policy, practice and regulation on the ground.
- 2.3. Both the FSF and the Minister have indicated that a dialogue between the government and the sector on several of the issues in the proposals, would be of benefit to the successful implementation of the new arrangements.
- 2.4. This paper is intended as an initial contribution to the development of this dialogue and provides initial comments on some of the key issues and proposals highlighted in the Ministers speech.
- 2.5. It is not intended to become FSF policy or to suggest such policy is either necessary or desirable. If anything, it is a response to the Chairman's challenge to all members to

contribute to the thinking and development of the sector on the government's current agenda for Fire and Rescue Services.

2.6. The paper responds to the Act and the Ministers recent speech and is divided into the following sections:-

- Accountability and the new inspectorate
- Transparency and Evidence
- Governance issues
- Proposals for increasing efficiency and effectiveness
- Workforce Reform
- Conclusions

3. Accountability the new inspectorate and inspections.

3.1. **The Act** (in its pre-publication guidance) anticipated the creation of a 'rigorous and independent inspection regime' for fire and rescue in England, with sufficient access to data and information to ensure robust inspections, and the ability to undertake joint inspections with HMIC.

3.2. There is provision in the Act for the Home Secretary to appoint a chief fire and rescue inspector for England, to approve a framework of inspection and to require inspectors to publish the reports of their inspections, as well as an annual report to Parliament.

3.3. **The Minister** announced that the inspectorate will be modelled on HMIC including (as with policing) a focus on 'efficiency and effectiveness' and that regardless of provider, inspection teams will include suitable skills and expertise from the fire sector.

3.4. The minister gave some further indication of the nature and scope of the proposed inspections when he stated that the inspectorate will be empowered to determine:-

- How effective each service is to prevent and respond to incidents;
- Whether the service provides value for money
- Whether the service understands its current demands and where the future risks lie; and
- Its leadership, training, diversity, values and culture

3.5. It is anticipated that the minister will make a further announcement shortly, outlining his ambition for the first inspections to take place this year.

3.6. Finally, he announced that the government will also be able to commission 'thematic' inspections on individual issues if needed and stated that he wanted the first issues to be on 'diversity, collaboration and flexible deployment'.

3.7. **In other developments** in advance of the Act and the ministers statement, the Home Office engaged with Chief Fire Officers Association (CFOA) & Chief Fire and Rescue Advisors Unit

(in the Home Office) to agree a set of principles and to develop the approach to the inspectorate.

3.8. The Home Office then commissioned HMIC to prepare an assessment of the scope and nature of a proposed inspectorate for FRS in by October 2016. This was undertaken by Sue Warren Management Consultant at Eclipse Consulting Ltd and a part time HMIC inspector. (Ms Warren is a part-time HMIC inspector and was previously an HMIC inspector and is an ex senior police officer). This included an analysis of the other Home Office Inspectorates (police, prison, probation), although apparently not the arrangement in devolved administrations, other Fire Inspectorate or non-Home Office Inspectorates.

3.9. Although this initial report has not been published it is understood that two potential models for a new inspectorate were commissioned from HMIC & Blue Light Works (BLW), and a stakeholder group comprising the Home Office, Chief Fire and Rescue Advisors Unit Chief Fire Officers Association, the Association of Police and Crime Commissioners and the Local Government Association

3.10. Commentary.

3.11. It is immediately noticeable that the 'Independent' inspectorate promised or referred to in the Prime Ministers speeches when she was Home Secretary, is now referred to in the Ministers latest speeches as a 'suitable' inspectorate that will be 'modelled on HMIC'.

3.12. Chapter 4 of the Act makes clear that Her Majesty may appoint inspectors 'as the Secretary of State may determine', and in addition to inspections, the inspectors 'must carry out such other duties.....as the Secretary of State may from time to time direct'. Similarly, the Minister announced that the first thematic issues he 'wants the inspectorate to focus on' are diversity, collaboration and flexible deployment.

3.13. It is well established that the more independent an inspectorate is, the more robust and effective the scrutiny it provides. The most established and effective external inspectorates regulators or scrutineers, such as the National Audit Office, (or Ofsted prior to the Education and Inspections Act 2006) are considered part of official scrutiny arrangements rather than part of direct government and report formally and directly to parliament rather than to a government department.

3.14. The CQC, although it reports to Parliament through the Department of Health nevertheless is allowed to have 'independent' in their formal title as in 'the Care Quality Commission, the independent regulator of health and adult social care services in England' and repeat it in all their externally published materials.

3.15. The Scottish example.

3.16. In Scotland the Chief Inspector (HMFSI) is appointed by Order in Council and operates independently of Ministers and the SFRS. Its purpose is to give assurance to the Scottish public and Scottish ministers that the SFRS is working in an efficient and effective way, and to promote improvement in the SFRS. The statutory basis for the inspectorate is derived from sections 43A to 43G of the Fire (Scotland) Act 2005.

- 3.17. In carrying out its functions, the Scottish Inspectorate has to have regard to ‘the principles of public focus, independence, proportionality, transparency and accountability’. It is also made clear in statute that the Chief Inspector has a duty to make ‘independent’ determinations.
- 3.18. A ‘Fire and Rescue Framework’ for Scotland sets out how Ministers expect the SFRS to operate and how, in part, its effectiveness and efficiency are to be measured. The framework is the starting point for structuring and prioritising the inspection programme, and any review is subject to public consultation. The strategic position of the HMFSI is more complex than its English equivalent (HMFSI has to collaborate/align its work with Audit Scotland, the Ombudsman and can receive request from Health and Safety Executive the Crown Office and the Procurator Fiscal Service). It has therefore established a number of bilateral Memorandums of Understanding.
- 3.19. Implications and Considerations for Fire Sector Federation members**
- 3.20. It is clear that a truly independent, or freestanding Fire Inspectorate is not achievable within the terms of the Act. There are however, a number of ways in which more (or less) assurance of its independence and operation can be achieved.
- 3.21. The fundamental issues that key stakeholders such as the FSF will want to contribute to in relation to this issue are at the strategic and operational levels, namely
- The strategic mandate and strategic positioning of the new inspectorate in the future organisational landscape of the sector and the regulator; and
 - The operational mandate, regulatory infrastructure and collaborative relationships with other key scrutiny partners
- 3.22. The strategic issues are best addressed by contributing to a debate (still to be precisely defined) on the role, purpose and objectives of the new Inspectorate.
- 3.23. The Act’s provisions make it clear that the new Inspectorate will report to the Home Secretary and that to date, officials and commissioned reports have concentrated on the existing Home Office Inspectorates, namely those for the police, probation and prisons.
- 3.24. **Proposed position:** The FSF may want to take the position that there are clearly lessons to be learned from other public services inspectorates outside of the Home Offices portfolio and especially from specialist Fire Inspectorates such as the HMFSI in Scotland.
- 3.25. It is essential that we learn from a wide range of inspectorates and incorporate best practice from this wider group if we are to create the modern, fit for purpose’ inspectorate that the government and the sector both aspire to see.
- 3.26. The Minister has indicated that there will be a focus on efficiency and effectiveness which have been incorporated in the purpose and objectives of almost all of the new and existing public service inspectorates since the Cabinet Office published its seminal report ‘Inspecting

for Improvement’ in 2003. However it is clear this is necessary but insufficient on its own to define the purpose of the new inspectorate, as the Scottish Inspectorate and recent debates in England over the changing purpose of various inspectorates and regulators such as CQC, NHS Improvement, and the demise of the Audit Commission have demonstrated.

3.27. The second contribution is to the debate over the form and content of the three statutory documents that the Act requires the Secretary of State and/or the Chief Fire and Rescue Inspector to provide. These will largely define the inspectorates operational mandate, and its’ collaborative relationships with other key regulatory partners. They are:

- the ‘inspection programme’ to determine what types, forms, scheduling and locations of inspections, the inspectors propose to undertake
- an ‘inspection framework’ which will define the manner in which it is proposed to undertake the inspections; and
- Arrangements for additional inspections outside of the regular programme, initiated by the Chief Fire and Rescue Inspector.

3.28. In responding to the operational issues it should be noted that the use and meaning of the phrase ‘inspections framework’ in England appears to be different to the use and interpretation of the ‘framework’ in Scotland. The Scottish example (which is under review) appears to relate to the organisational landscape of the regulatory sector as well as to the operating mandate of the inspectorate itself. There is however no impediment in the act should the Secretary of State wish to adopt a broader conceptualisation.

3.29. Although the minister has indicated

- that there will be thematic inspections and joint inspections as well as service inspections;
- that he will expect the LGA to review its peer reviews to complement the work of the inspectorate and
- has provided some idea of content (see paragraph 3.4 above),

This is clearly only a partial picture of an operational mandate, and he has promised a further announcement on this shortly. We would hope this announcement will generate appropriate consultation on fleshing out more detail on both the strategic and operational issues referred to in this section.

4. Transparency and Evidence

4.1. **The Act** includes provisions for amendment of the 2004 Act to enable fire inspectors to enter premises, obtain information, and undertake joint inspections with HM Inspectors of Constabulary. These provisions will put beyond doubt the powers of inspectors to access the information they need to undertake a robust examination of fire and rescue services including, if necessary, without services’ consent.

4.2. **The Minister** announced that he would be creating (with the intention of being operational this year) to ‘mirror what we see on’ www.police.uk. This new website will hold a range of

FRS information including data to help the public assess the performance of services, as well as information about chief officers pay, expenditure, accounts, efficiency plans and the workforce statistics. The minister considers that the website has 'the ability to unleash armchair auditors to scrutinise and do their work on how their service is operating'.

- 4.3. In the spring, the minister will also publish the first tranche of incident level data from the new Incident Recording System, and we can anticipate (and welcome) this information as well as the new efficiency measures (see below); the standards from the new professional standards body (see below) and the various basket of goods exercises, both new and on-going (see below), to appear on the new website.
- 4.4. It is not clear whether thematic or organisational inspection reports will appear on the new website as currently their equivalents do not appear on www.police.uk but are on the HMIC website.
- 4.5. **Outside of these announcements** a working group led by CFO Curry of Hampshire FRS is considering the scope and remit of the new standards body together with developing costed proposals.
- 4.6. **Commentary.**
- 4.7. Since Bentham and Rousseau, transparency and openness in government have been seen as a means to prevent abuses of power, particularly in democratic systems. This has been formalised by opening up archives, making minutes public and having open meetings to make data open, visible and free.
- 4.8. E-Government and the internet has led to an exponential increase in the capacity of organisations and governments to make information available. These have coincided with the Freedom of Information Act and other transparency initiatives, which means there is an unprecedented amount of raw data and information potentially available.
- 4.9. However, transparency is not the same as accountability and is no good if no one understands what is made visible or available. Transparency is only beneficial if people are able to understand what is being made open so they can do something about it, if they so wish. Most public website therefore also contain tools and techniques to help understand analyse and use the data rather than just provide the data.
- 4.10. The Minister is proposing a single new website based on the interactive police website recently created at www.police.uk. This will impose standard upon the information and data. A single website with public access, quality assurance and real time information is clearly the most appropriate information database, and no doubt editorial control, for different parts of the site will be organised. It is clearly desirable for the information referred to in paragraph 4.3 to be on the website and/or available via hyperlinks.
- 4.11. However the police site has no access or links to the HMIC site and its performance or to other key stakeholders' websites such as the National Audit Office. The level of support for interrogation and analysis is also relatively rudimentary particularly when compared with

similar sites such as the 'LGA Inform', the Cipfa statistics website, the NHS observatories, and Right care websites.

4.12. In terms of good practice by international standards, the websites and systems with comparative performance information that the National Audit Office have recently pointed to as examples of 'data led cultures of performance' (echoing the ministers call for a change in culture) are in Canada, which has a long history of performance based budgeting since the 1970's; the USA with federal (performance.gov) and state (Virginia Performs) examples and nearer home Scotland Performs.

4.13. In addition to the quality assurance of their data and information; and the extent of potential user interaction, analysis and interrogation, one key aspect that all these site pay particular attention to is their editorial policy and governance arrangements.

4.14. Implications and considerations for Fire Sector Federation members

4.15. Given previous stances it is clear that FSF members will want to support and be assured that the website will provide open public access to comprehensive performance data and information and a sophisticated level of interrogation and interoperability for it to optimise its potential contribution to development and improvement in the sector. They will also, want to support an array of links and references to key stakeholders and their websites, - and this is likely to be much wider than is currently afforded by www.police.uk.

4.16. As exemplified by membership of the Federation itself, Fire and Rescue Services traditionally have a more eclectic range of partners and key stakeholders than the police, particularly in terms of suppliers, alternative service providers, equipment, manufacturers and other related professional organisations (such as the Institute of Fire Engineers, the insurance companies, Building Control Officers, Fire Service College, LGA, HSE and the Ambulance Services).

4.17. It is noticeable that www.police.uk is hosted on the Home Office website rather than on the College of Policing website which contains the police standards, research, support for learning and development and other advice. The Minister has suggested that the new website will host these matters (see paragraph 4.3 above), and some of the other key databases.

4.18. At this stage there has been no formal decisions or definitive statements about detailed arrangements for the website. The federation anticipates that the sector as a whole will wish to contribute and play a full part in decisions on the governance, hosting, design, editorial and content arrangements for the new website.

4.19. Members may therefore wish to reassure the minister and officials of their willingness to contribute to developing these arrangements and reassure them of the competencies and capabilities already available within the sector to help with this work.

5. Governance Issues.

- 5.1. **The Act** – one of the headline proposals of the act is its provision to enable directly elected Police and Crime Commissioners to take on the functions and duties of fire and rescue authorities, and further to delegate fire functions to a single chief officer for police and fire, where a local case is made. PCCs must consult local people on their proposals and listen to local views. The act also includes a legal duty on FRA to cooperate and provide information to PCCs to build their cases. Where local stakeholders do not agree there is provision for a process wherein the Home Secretary makes the decision.
- 5.2. **The Minister** considers this will increase accountability by bringing the same direct democratic mandate to FRS as there is in policing. Where PCCs do take on FRS they will be called Police Fire and Crime Commissioners and he believes that PCCs (PFCC?) can ‘drive the pace of reform, maximise the benefits of collaboration and ensure best practice is shared’. If a PCC has a clear case but the FRA do not want change he states ‘this won’t be good enough’
- 5.3. **Outside of these announcements:** supporters of the potential new governance arrangements such as the Association of Police and Crime Commissioners, various think tanks and pressure groups supportive of the proposed new arrangements and commercial services are continuing to provide support guidance and advice to PCCs wishing to pursue new governance arrangements and extended responsibilities.
- 5.4. In addition CFOA is reorganising its governance arrangements and in April the National Fire Chiefs Council with Roy Wilsher, Chief Fire Officer of Hertfordshire Fire and Rescue Service, as the first Chair. The Council will provide, professional advice to government (including devolved administrations) and the wider sector on matters such as professional standards, operational guidance, research and sharing best practice, while supporting the whole of the UK FRS.
- 5.5. The Chair will be a dedicated, full time role with a term of office between two and four years. They will speak on behalf of the NFCC and lead it at a national level. They will be supported by two vice chairs and will oversee the delivery of an annual plan, be set by the Council
- 5.6. **Implications and considerations for Fire Sector Federation members**
- 5.7. There is a clear direction of travel in both the Act and in government policy towards directly elected governance which both the FSF and the service acknowledge. However, there are three key issues relating to the potential new governance arrangements that the FSF may wish to comment on.
- 5.8. The **first issue** is the building and assessment of the proposed ‘local business case’ that is crucial to a change in governance.
- 5.9. The Act and the Minister have given some indications of what this should contain, such as consulting local people and listening to local views, but these and other related issues are in

need of ‘fleshing out’ and detailing. The following issues are among those identified as needing urgent clarification and assurance.

- An analysis of the local area based on the needs of the local community, focusing on public safety, civil protection and the roles of the fire service and police (the existing Joint Strategic Needs Assessments should assist here).
- A strategic and operational appraisal of the current and future deployment of local fire, police and ambulance services and their collaboration.
- A financial evaluation is demonstrate value for money. This should be based on long-term financial and social returns on investment based on definitions in the Public Service (Social Value) Act.
- Proposals for strengthening governance arrangements and in particular scrutiny.
- A formal public consultation with mandatory input from the NHS, local authorities and other emergency responders, such as the Environment Agency, as a minimum.
- An independent appraisal from an acknowledged expert to provide independent validation and public assurance.
- The proposed relationship to the local ambulance trust and to the local resilience forum.

- 5.10. The **second issue** is the potential for even greater plurality in the governance arrangements overseeing Fire and Rescue Services in England and the UK.
- 5.11. While the government would clearly like to see directly elected PCCs assuming wider responsibility for Fire and Rescue Services, there is considerable potential for greater short-term plurality in the forms of governance arrangements that will become visible within the sector as a result of the new legislation.
- 5.12. Within a couple of year we are likely to see PCCs with responsibilities for FRS, with and without direct employment responsibilities, in Metropolitan, Combined and County service areas. These will be operating alongside Fire and Rescue Authorities and these could also be in Metropolitan, Combined and County Services.
- 5.13. This plurality of alternative governance arrangements will need to be reflected and accommodated in future sector governance and consultation arrangements. They will also need accommodating in the governance arrangements of existing statutory and informal collaborative arrangements, most notably Local Resilience Forums, Community Safety Partnerships and Health and Wellbeing and Local Safeguarding Boards.
- 5.14. Finally they will need accommodating in the new performance management, inspection and monitoring regime that is intended to supersede the current Operational Assessments and the LGA peer review arrangements. All performance management regimes in the public sector include an appraisal of the Leadership and Governance arrangements for a particular organisation or network of organisations delivering public services or safeguarding local populations.

- 5.15. The **third issue**, and to-date, largely ignored, aspect of the new arrangements that the FSF may wish to comment upon is the omission of any proposals for strengthening and adapting current scrutiny arrangements, as and when PFCCs supersede Fire Authorities.
- 5.16. The existing Police and Crime Panels are already considered relatively weak and amongst the most disempowered bodies providing formal scrutiny of public bodies. They are also composed entirely of members with interests and expertise in various policing issues. The FSF and the sector more generally will all wish to see and be reassured that their composition and recruitment arrangements; their knowledge and information base and their experience of Fire and Rescue Services all need considerable improvement and strengthening.

6. Proposals for improving efficiency effectiveness and collaboration

- 6.1. **The Act** introduces a duty to collaborate for the police, fire and rescue, and emergency ambulance services, 'where doing so would improve their efficiency or effectiveness'. [It can be assumed that the general fiduciary duty upon public services to achieve 'economy' via achieving 'value for money' is indirectly incumbent upon them]. This provision follows from the findings of the Knight Report and more recently from the NAO and Public Accounts Committee reports, which were all critical of the progress in collaboration and the level of efficiency savings being delivered by the service.
- 6.2. **The Minister** stated that better joint working can strengthen emergency services, deliver significant savings and enable them to better protect the public. He focussed, in particular, on current and proposed initiatives involving procurement and collaborative working.
- 6.3. The Minister commended the 2016 CFOA 'basket of goods' exercise around 25 common pieces of kit that revealed significant discrepancies in costs. He announced that he intends to ask CFOA members to repeat the exercise this year but also announced that the Home Office will undertake a separate and more extensive additional exercise in the spring of 2017. He also challenged CFOA through their new commercial strategy to make changes to procurement practices and to set a quantifiable ambition as to what savings are possible.
- 6.4. The Minister referred to the new duty to keep collaboration opportunities under review which is a central requirement of the Act. He assured us that he would champion best practice and he gave examples for all three main emergency services successfully collaborating with each other. However, he stated that he did not expect collaborative work to be carried out 'at the expense of core services' nor 'as an excuse for not considering the scope of workforce efficiencies'.
- 6.5. **Outside of these announcements:** The Emergency Services Collaboration Working Group has published its National Overview for 2016 and this includes *inter alia*, a NPCC/CFOA Overview of Police and Fire Collaboration; and a Consensus Statement on Saving Lives and Improving Health and Wellbeing between AACE and CFOA signed in May 2016.
- 6.6. Commentary**
- 6.7. It is clear that the government is unimpressed by the extent of what the sector has achieved to-date in collaborative working (in non-response services), and in particular to progressing

joint procurement of goods and services. It has championed the joint use of premises and operational integration between the three blue light services.

- 6.8. He has therefore announced some extensions to recent initiatives and some new initiatives of his own to stimulate more progress and innovation in these areas. It is equally clear that the government believes there is further scope for improvement in these areas
- 6.9. This agenda has clear implications for FSF particularly those organisations that are suppliers of good and services.
- 6.10. It is also clear that any new performance management, inspection and monitoring regime will have economy efficiency and effectiveness as a core part of its assessment and reporting. Almost all performance management regimes in the public sector include an appraisal of value for money as part of their performance regimes as this is a core element of public assurance in a democratic system of government.

7. The Thomas review and workforce reform

- 7.1. In previous statements the government have made clear that the Thomas review provided recommendations for reforming the National Joint Council and the grey book, and that these changes need to be expedited.
- 7.2. The Home Office in collaboration with CFOA have also already begun work on establishing a new professional standards body for the service tasked with building a comprehensive professional framework of standards for the service.
- 7.3. **The Minister** stated that he expects the inspectorate to inspect against the standards set by the new body and the standards body will consider the inspectorate's findings when setting standards. But he made clear that the sector needs more than a new professional body, it needs an organisational culture shift. He also considers there is considerable scope to improve recruitment, training, development and leadership at every level of FRS and that the new standards body will help.
- 7.4. The standards working group led by Dave Curry (Hampshire FRS) will consider two options:-
 - A new fire standards body affiliated to the College of Policing; or
 - A fully combined College of Policing and Fire.

The minister expects the considerations to conclude by September 2017 and the new body to be operational in late 2017

- 7.5. It is clear from the governments' earlier response to the Thomas review and in statements from ministers that workforce diversity and workforce reform are clearly an early and a high priority for the government and the sector. The government wants the service to create a much more diverse working environment, free from bullying and harassment, with strong leadership and more flexible working conditions. The government expects local workforces to better reflect local communities

7.6. The minister believes a more diverse workforce and cultural shift will requires not only changes in recruitment but action on career progression and inclusive working practices. With almost a third of the workforce due to retire he see a 'golden opportunity' for the workforce to change and better reflect the communities they serve.

7.7. Commentary

7.8. Most of the proposals relating to the need for workforce reform, and the ambition of the government to see this change accelerated have been trailed in previous announcements on 'Thomas'. It is a change that is primarily for the services, CFOA and staff representatives within the services to grasp. The FSF can only indirectly support this process and no doubt individual organisations within the federation will respond positively to appropriate requests for assistance.

7.9. The new evidence and information bases referred to in section 4 above will help provide the groundwork and the first thematic inspection of 'diversity, collaboration and flexible deployment' announced by the minister is obviously intended to generate momentum and a sense of urgency.

8. Conclusions

8.1. The government expects a service that is more transparent, more accountable, more efficient and more professional. It considers the changes proposed by the Act and in policy will help, and he has set out some specific leadership challenges.

8.2. However, greater integration and proactive supportive collaboration will be required across the sector to meet the ambitious agenda.

8.3. In short the government expects the National Fire Chiefs council to drive operational change; the inspectorate to provide assurance and the standards body to support workforce development.

8.4. But it also expects other parts of the sector such as the Local Government Association and the FSF to be pro-active in support.

8.5. In due course a refreshed national framework will be produced to be clarify these new expectations and responsibilities and to further progress the building of the new regime.

Working Paper Authorship

This working paper (No1) has been drafted by Pete Murphy of Nottingham Business School for the Fire Sector Federation. Dated 14 February 2017

All views within it are the sole responsibility of Mr Murphy.

