

**A response to**

**THE FUTURE OF THE FIRE AND RESCUE SERVICE IN  
ENGLAND**

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# THE OPTIONS FOR POTENTIAL REORGANISATION OF THE FRS IN ENGLAND

## A. Locally-determined mergers

*This option would encourage local mergers between neighbouring Fire and Rescue Services on a locally-determined ad-hoc basis.*

### **Preamble**

Historically there are number of sub-optimum outcomes that are often associated with the local *ad-hoc* restructuring of directly elected politically controlled local public service delivery organisations through voluntary mergers. These relate to governance and political control arrangements, as well as the vision, objectives, coherence, strategic management, operational delivery, organisational and service innovation. They also relate to the efficacy, efficiency and effectiveness of the resulting organisations contribution in to collaborative delivery partnerships as well as organisational and systemic improvement.

These sub-optimal outcomes have tended to affect, and be more characteristic of, multiple service organisations rather than primary or single service public organisations such as Fire and Rescue Services but recent and historical experience shows the latter (single service delivery organisations), have also always been prone to these outcomes.

These outcomes are characteristic of locally-determined ad-hoc mergers internationally as well as domestically and Northern Ireland's sectarian divide has produced many local examples of sub-optimum organisations and configurations of local public services relating to single and multiple service public authorities.

By way of illustration we would point to some recent prime examples from the voluntary merger of multiple service organisations, such as local authorities in England, were voluntary mergers (as opposed to systemic, comprehensive re-organisation built on the preparatory work and recommendations of independent reviews and tribunals such as those of Royal Commissions), have tended to create inter alia:

- Political 'fiefdoms' i.e. new authorities with a greater tendency to be dominated by a single political party; and/or
- New organisations which are less enduring in their fitness for purpose and that often have to be reorganised after a relatively short time scale (the Bristol and the 'Avon' Metropolitan Area being examples) and/or
- Inefficient local delivery operational areas or hinterlands (such as South Holland in Lincolnshire and Fenland in Cambridgeshire sharing management or South Northamptonshire and Cherwell in Oxfordshire) and/or
- More complex and less efficient or effective cross sector working arrangements (one notable example being local NHS services, social services, housing, welfare and criminal justice delivery areas all being based on different geographical boundaries.
- Under-bounding inefficiencies when the peripheral sub-urban areas of major cities are not within the same governance areas of the 'core' city – Hull, Leicester, Nottingham, being examples and/or

- Remainder or left out areas that become increasingly difficult and inefficient to provide services for and /or
- Poorer public association or identification with new areas (although the loss of identity with former areas is generally over manipulated by politically motivated opponents of such change).

Fire and Rescue Authorities (in the UK and internationally) provide a relatively coherent and consistent range of services to the public when compared to other public services or sectors. The publics expressed needs or wants from Fire and Rescue Services is remarkably consistent across different areas or sectors of society.

Fire and Rescue Services often have to deploy their resources across emergency service boundaries and across geographical boundaries in response to major incidents and emergencies.

Fire and Rescue Services have to be planned, deployed and integrated vertically (at national, regional and local levels) as well as horizontally across Health, Local Government and Criminal Justice providers).

Fire and Rescue Service configuration needs to be fit for purpose in terms of ‘response’, as well as in terms of emergency planning, resilience, preventative and regulative services.

## **Response to Specific Questions**

### **1. What do you think are the barriers to achieving both change and efficiency savings?**

The barriers or challenges to ‘change’ are clearly vested interests, political and organisational inertia, perceived transition costs, inadequate benefit identification, and consequently the inadequate will and wherewithal (in terms of motivation and leadership) to achieve changes voluntarily within the Fire and Rescue Community of Interest at local and national levels. It is also worth learning from the recent experience in the Republic of Ireland where implementation of the national re-organisation of FRS has been foundering for some time on Human Resource issues.

The proposed mergers of Hampshire/Isle of Wight, and Dorset/Wiltshire and the relatively few previous mergers since the 1970’s have shown that such mergers have always been theoretically and legally feasible, as well as possible in practice, but the (almost glacial) pace of change and the clear lack of individual and collective leadership to drive through such initiatives (even when financial and other marginal incentives have been on offer), suggest that this approach is unlikely to be economic, efficient or effective nor to result in a coherent solution providing more equitable protection and outcomes to the public, strategic delivery partners or service users such as the business community.

Voluntary merger ideas have always seemed politically expedient with a ‘simple’ processes appearing a low cost and attractive ‘solution’ to Government and Whitehall – in practice they have invariably proved a chimera, with short and long term cost and service inefficiencies and sometimes perverse outcomes.

### **2. Do you believe this option would achieve resilience across England?**

Resilience, as used in the context of emergency services, usually refers to a combination of resilience in terms of the safety and security of our communities on the one hand and the organisational and financial resilience of individual Fire and Rescue Services and the network of emergency service providers. In this context it is a relative rather than an absolute concept and it has to be considered in the short medium and long term.

Although the success of all three options (locally-determined ad-hoc mergers; Larger Scale mergers; or a national service) will depend to an extent on the process adopted and the outcome achieved as a result of the exercise, we believe this option is the one that is the least likely to achieve, short, medium and long term resilience for the service, the services key strategic stakeholders the public and service users and the organisations delivering the service.

### **3. To what extent do you think this option would achieve the required efficiency savings?**

This is a judgement based on the balance of probabilities, and is subject to the caveats outlined in our response to question 2 above. Again it is a relative judgement and is based on the 3 options outlined in the consultation together with a fourth no-reorganisation or status quo option.

On balance, we believe that neither the 'do nothing' or the reliance on 'locally determined *ad-hoc* mergers' will achieve the scale of efficiency savings envisaged for the service in any of the short, medium or long terms. Neither do we believe that they will achieve them in the most efficient and effective potential process available.

### **4. What do you think are the operational opportunities of this option?**

This option has clear operational efficiencies that can be captured at local cross boundary levels (in terms of operational services) and in both cross boundary and 'remote' collaborations in terms of back office, control centre and support services. These are likely to be short term 'easy' (but nonetheless valuable) wins as they become apparent to the partners and can easily be justified and implemented.

### **5. What do you think are the operational risks of this option?**

There will always be potential operational risks in any emergency service reconfiguration, although the risks for this option should be relatively low and emergency services are generally very risk aware and therefore relatively effective at service reconfiguration (when compared to non-emergency public sector service reconfigurations).

The key operational risks therefore relate to the loss of opportunity costs/benefits in terms of other (potentially better) alternative service reconfigurations with better social and financial returns on investment and the use of resources. There is also the risk of under-investment or under re-sourcing of the quality assurance process available or applicable to such relatively low level *ad-hoc* mergers.

Individual Fire and Rescue Services in the UK have a huge range in terms of the size of the organisations and the host populations they are serving – from London to the Isle of Wight.

They also cover large urban conglomerations (where whole time service deployments are more likely to be feasible, efficient and effective) to sparsely populated areas where part time retained services

may be more feasible, efficient and effective – although the built up area/sparse population contrast is relatively small internationally.

While there is clearly no single optimal size for all services and geographies it was noticeable that in terms of their individual operational and financial performance there was a tendency for smaller services to cluster in the lower performance categorizations in all generations of national performance assessments – although there were clearly exceptions. This strongly suggests there are potential operational and other efficiencies to be gained from mergers or amalgamations. However the operational risk of large scale and/or complex mergers also increases with both size and complexity.

## **6. What do you think are the resilience opportunities of this option?**

This clearly depends on the level of ‘take-up’ and the fitness for purpose of the resulting mergers.

How resilient the new organisations are as economic, efficient and effective deliverers of Fire and Rescue Services; as individual organisations and as a national network (financially and in terms of being able to command the financial and other resources required to meet their long term –albeit changing - operational *raison d’etre*) will depend on how close they get to optimising service efficiency and fitness for purpose, at the same time as capturing government and public support (local and national).

Our view is again a judgement based on a number and implicit weighting of factors and our view of likely future reactions amongst the FRS general community. There may for instance be a number of short term mergers that increase financial and organisational resilience but soon become ineffective in terms of medium and long term delivery of services (and hence community resilience) and individual organisational resilience. Will these organisations be more (or less) amenable and efficient at future mergers or will the disruption generate barriers to future mergers.

Our view is that this option is likely to result in sub-optimal resilience in terms of communities, organisations and the national FRS network. It is likely to offer some improvements over a ‘status quo’ option, and some short term improvements in resilience to (some) local communities, individual organisations and the national network but is less likely than the other two options to capture greater, medium and long term resilience to local communities, organisations and the national network.

## **7. What do you think are the resilience risks of this option?**

See our response to questions 5 (final paragraph) 6 (final paragraph) above.

All service configurations and organisational changes depend on designing and managing the changes effectively – we assume that co-production between the government and the FR community of interests will be adopted and that PRINCE2 ‘quality assurance processes will be applied.

We believe that the FRS community are overwhelmingly aware of the scale of the challenge and the need for change. Because of their history and the national and local nature of the service they are amenable to more prescriptive leadership from central government than other public services.

However they need to be convinced of the solution and to buy-in to the proposed changes – without this resilience risks rise exponentially. We believe the FRS community regard a coherent and comprehensive nation-wide strategy for reconfigurations will minimise risks (although this doesn't necessarily mean a national service). Although the 'local voluntary mergers' option may initially increase resilience we do not consider it a realistic, feasible, economic or efficient strategy for improving community, organisational or national network resilience in the medium or long term.

**8. Beyond efficiency savings, what do you think are the benefits of this option? (Please comment on resources, training, national planning, control centres, capacity, operational performance, or anything else you feel is important.)**

Depending on the process adopted and the outcomes achieved under this option, there could be marginal relative benefits to nearly all of the factors listed, although these will be variable across the different functions, factors and activities listed.

It has to be appreciated that over the last 5 years reducing national and local resources and investment in the service has been a function of public sector financial restrictions and changing local and national priorities – so there will be greater variation in the efficiency of these operations than under previous managerial and governance regimes. The theory and practice of Cutback Management (that has dominated governance and management of the service since the recession) focusses on the short term, is generally reactive rather than proactive and is generally a poor performer in terms of creative or innovative solutions. It is seldom economic efficient and effective over medium and long terms.

The factors that are more rather than less likely to benefit from this option are training and control centres but these and the other factors are likely to see greater benefits under the other restructuring options suggested in this consultation.

**9. Following this option, how do you think Fire and Rescue Services should be inspected to assess service quality and viability?**

There is widespread support across both Fire Services and the Fire Sector in general for the re-instatement of an independent fire inspectorate. Fire Inspection was absorbed into the Audit Commission during the CPA period and fire service inspection effectively disappeared when the Commission was abolished. (It is notable that the Fire Service representative submitting evidence to the DCLG Select Committee considering abolition of the Audit Commission favoured retention and reform of the Audit Commission rather than abolition).

Although the post of Chief Fire and Rescue Adviser was created as part of the Senior Civil Service in 2007 and there have been two post holders Ken Knight and Peter Holland. The post is clearly neither an independent body nor an inspectorate and its lack of independence was demonstrated by the publication of the Sir Knight Report 'Facing the Future' in 2013. Independent inspectorates were retained in Scotland and Wales facilitated by devolution and the Northern Ireland Service has commissioned the Scottish Inspectorate to provide a comparable function.

The Fire Service College has operated predominantly as a training establishment (rather than an inspection and standards body) both before and since it was established at its current site in Gloucestershire. Its' operational management was outsourced to Capita by the Coalition Government.

There are a number of potential inspectorate 'models' that an inspectorate could be reconstructed for example Her Majesty's Fire Service Inspectorate for Scotland or the 'new model' Her Majesty's Inspectorate of Constabulary in England. In addition to an external inspectorate the Fire and Rescue Service requires much improved and robust performance management and financial assurance regimes than is currently the case in England, one essential part of which is an independent inspection capability and capacity..

#### **10. Following this option, how can we ensure democratic and community accountability?**

Locally determined and essentially small *ad-hoc* mergers would presumably remain within the local democratic accountability arrangements in a similar way to existing 'Combined Fire Authorities'.

The strengths and weaknesses of these arrangements are well established but it would be inequitable to change the governance and accountability arrangements for some but not all combined authorities.

There are of course a number of ways that democratic accountability could be improved for combined authority elected members and managers such as direct elections, and/or improved scrutiny and assurance and/or improved quality assurance in their transparency and public reporting.

It is very unlikely that widespread boundary 'co-terminosity' between the different emergency services would emerge from this option (if it emerged anywhere) and that proposals for 'Joint Police and Fire Commissioners' or 'Joint Ambulance and Fire Service Trust Boards' would be facilitated in practice.

#### **11. What governance arrangements do you envisage for these entities?**

An improved local governance and accountability model for Fire and Rescue Services is in our view required under any of the options for structural reform. Fire Service Authorities are not seen as high performing nor exemplars of good public governance and scrutiny still less local democratic accountability. The recent reductions in external accountability and scrutiny combined by the traditional 'distance' of the current authorities from their public has exacerbated their perceived lack of fitness for purpose.

Under the *ad-hoc* local mergers option the reason, justification and incentive to move to a new governance and accountability model would be weaker than under other more radical options.

## **B. Larger Scale Mergers**

*A merger of the existing 46 Fire and Rescue Services into a vastly reduced number of Fire and Rescue Services across the country.*

### **Preamble**

A vastly reduced number of FRS across the country suggests this option may be looking at a 'regional' option without using the designation 'region'. In considering this option it is prudent to recall some specific issues about the nature and timing of the regionalisation agenda and its relation to FRS.

Regionalisation as a re-organisation/restructuring agenda has strong connotations and associations within the Tory party and the Coalition Government with the European Commission but it also has strong connotations and associations with the political priorities and agenda of English devolution in particular as personified by the political agenda John Prescott when he was Deputy Prime Minister. As Deputy Prime Minister, Prescott was seen to introduce a 'regional perspective' into all public service policy areas wherever he felt it was potentially feasible.

Within FRS, and unlike within other local public services, such as health and local authorities, the modernisation agenda did not become synonymous with performance improvement, innovation, the creation of public value and better outcomes for local communities (difficult for service providers but ultimately positive and justified). On the contrary it became synonymous with the prolonged second national strike, and a dispute over pay, collective bargaining and terms and conditions of service.

The 5-year dispute from 1998-2003, coincided with the period of public service modernisation, Best Value and the subsequent introduction of Comprehensive Performance Assessment Regimes.

Modernisation and Regionalisation therefore both have a much more negative connotations in FRS than they have in the wider public services and therefore, and notwithstanding the balance of merits and de-merits of the option, the adoption of any option or configuration of services, that can be portrayed as regionalisation will attract political, media and public resistance (and resistance within the FRS sector) that is disproportionate to the objective balance of merits.

## **Response to Specific Questions**

### **12. What do you think are the barriers to achieving a smaller number of Fire and Rescue Services?**

The 'generic' barriers or challenges to 'change' are clearly as applicable to large scale mergers as they are to the locally determined mergers suggested in option 1. They are vested interests, political and organisational inertia, perceived transition costs, inadequate benefit identification, and consequently the inadequate will and wherewithal (in terms of motivation and leadership) to achieve such changes voluntarily within the Fire and Rescue Community of Interest at local and national levels.

Most of these will generally be more difficult with larger mergers (vested interests, will and wherewithal for voluntary large scale mergers being examples) while others may well be less difficult proportionately. Perhaps counter-intuitively perceived transition costs do not tend to increase



proportionately; initial political and organisational inertia tends to evaporate quickly and benefit identification tends to be easier and clearer.

The key barrier will be in avoiding any re-structuring facilitated by large scale mergers being perceived as either regionalisation or 'demonised' the loss of local services, local control or local accountability.

Independent identification of new boundaries and the extent and dispute over co-terminosity of boundaries with police, ambulance, NHS trusts and local authorities could also be a barrier – the height of which depends on the proposed governance arrangements and the process for populating the new governance arrangements.

**13. Following this option, how many Fire and Rescue Services would you suggest is the optimum number, and along what geographical borders would they be organised?**

The building blocks for new service configuration are going to predominantly (but not exclusively) be based on aggregating existing service areas and should also take into account both the boundaries of the police and ambulance services and the standard regional boundaries of the 9 English areas.

We have not undertaken the detailed work necessary to identify precise boundaries, but our view is that 9 regional FRS (despite being similar in size, in terms of host population served, to many services internationally) are probably too large when factors such as the density of population, transport infrastructure and community identity are factored into the English scenario.

We would not favour significantly amending the London Fire Brigade boundary but believe the other 8 regions should be served by between 18 and 24 new service areas, with no more than 3 necessary for any one of the existing regions. Our initial; high level analysis would favour the actual number being 20 – which we are prepared to share but consider the numbers and details under-evaluated at this stage.

**14. Do you believe this option would achieve resilience across England?**

As stated in our response to question 2 above 'resilience', in the context of emergency services, usually refers to a combination of resilience from the safety and security of our communities on the one hand to the organisational and financial resilience of individual Fire and Rescue Services and the network of emergency service providers. In this context it is a relative rather than an absolute concept and it has to be considered in the short medium and long term.

We believe that service configuration and resource deployment based upon 20 English FR Service areas would provide the optimum feasible resilience within the current or foreseeable financial or resource envelope and level of technology and innovation available to exploit. This is an adaptation of the BATNEEC (Best Available Techniques Not Entailing Excessive Cost) principle used in government regulations such as pollution control.

**15. What do you think are the operational opportunities of this option?**

As with the small merger option this option has clear operational efficiencies that can be captured at sub-regional and regional cross boundary levels (in terms of operational services) and in both cross boundary and 'remote' collaborations in terms of back office, control centre and support services. Unlike the first option they are more likely to endure and not be confined to the short term 'easy' (but nonetheless valuable) wins.

Both economies of scale and operational efficiencies will increase at great organisational scales and will start to be replaced by diseconomies and loss of operational efficiencies as the sizes of organisation grows. This of course depends on what the 'optimum' size for a service is and this will vary according to the human and physical geography of the areas served. Notwithstanding the geographical variations across England, we do not believe that diseconomies of scale or operational inefficiencies would start to emerge at the 'sub-regional' scale of 20 or be unmanageably significant barriers to large scale mergers at the regional scale of 9 or 10.

**16. What do you think are the operational risks of this option?**

As stated in response to question 5 above, there will always be potential operational risks in any emergency service reconfiguration, and the risks for this reconfiguration option would be greater than the first option, not least because of the greater time and uncertainty of the planning, transition and implementation phase of reconfiguration.

The risks should however be relatively low in comparison with other public sectors and some other services, since operational performance is largely based around stations and the initial pattern and operation of these could be maintained during transitions. In addition as also mentioned above, emergency services are generally very risk aware and therefore relatively effective at service reconfiguration (when compared to non-emergency public sector service reconfigurations).

The key operational risks therefore relate to the loss of opportunity costs/benefits in terms of other (potentially better) alternative service reconfigurations with better social and financial returns on investment and the use of resources. As stated above, the nearer an individual service and the overall configuration gets to the optimum sizes and relationships the lower the long term operational risks generated.

While short term operational risks may be higher for this option than for option 1, in the medium and long term this is reversed with this option having the lower operational risks. Operational risks would however start to rise again if very large scale organisations (greater than regional mergers) were to emerge.

**17. What do you think are the resilience opportunities of this option?**

As stated in response to question 6 above, how resilient the new organisations are as economic, efficient and effective deliverers of Fire and Rescue Services; as individual organisations and as a national network (financially and in terms of being able to command the financial and other resources required to meet their long term –albeit changing - operational raison d'etre) will depend on how close they get to optimising service efficiency, government and public support (local and national) and fitness for purpose.

Any view is again a judgement based on a number and implicit weighting of factors and a view of likely future reactions amongst the FRS general community. Our view is that a variation of this option is the one, on balance, that is most likely to result in long term resilience opportunities in terms of communities, organisations and the national FRS network. It is more likely than the other two options to offer greater, and more sustainable long term resilience to local communities, organisations and the national network.

**18. What do you think are the resilience risks of this option?**

Our response to this is essentially the same as our response to question 7 namely that all service reconfigurations and organisational changes depend on leading, designing and managing the changes effectively, being suitably funded. We assume that co-production between the government and the FR community of interests will be adopted and that PRINCE2 'quality assurance' processes will be applied.

We believe that the FRS community are overwhelmingly aware of the scale of the challenge and the need for change. Because of their history and the national and local nature of the service they are amenable to more prescriptive leadership from central government than other public services. However they need to be convinced of the solution and to buy-in to the proposed changes – without this resilience risks rise exponentially.

We believe the FRS community regard a coherent and comprehensive nation-wide strategy for reconfigurations will minimise risks (although this doesn't necessarily mean a national service). As stated above although the 'local voluntary mergers' option may initially increase resilience we do not consider it a realistic, feasible, economic or efficient strategy for improving community, organisational or national network resilience in the medium or long term. A variation on option 2 provides the basis for a better solution.

**19. Beyond efficiency savings, what do you think are the benefits of this option? (Please comment on resources, training, national planning, control centres, capacity, operational performance, or anything else you feel is important.)**

Depending on the process adopted and the outcomes achieved under this option, there could be positive benefits to almost all (if not all), of the factors listed, although these will be variable across the different functions, factors and activities listed.

Over the last 5 years reducing national and local resources and investment in the service has been a function of public sector financial restrictions and changing local and national priorities – and this has resulted in greater variation in the efficiency of these operations than under previous managerial and governance regimes. The adoption of 'cutback management' that has dominated governance and management of the service since the recession, has meant an inevitable focus on short term, essentially reactive approach to policy and management of the services rather than a more proactive long term approach. This generally generates a poor environment for creative or innovative solutions to emerge. It is also seldom economic efficient and effective over medium and long terms. A large scale option or the option of a national merger provide the service with an opportunity to think and act strategically and to look to the long term.

**20. Following this option, how do you think Fire and Rescue Services should be inspected to assess service quality and viability?**

As stated in response to question 9, we believe there is widespread support across both Fire Services and the Fire Sector in general for the re-instatement of an independent fire service inspectorate, which we strongly support. This does not have to be a large organisation and its most important attributes are that it should be independent, credible to the service and its key stakeholders (the 'HM' nomenclature should be revived) and that it should be seen to involve acknowledged expertise from both operational and non-operational parts of the service as well as expertise from outside the service.

As stated above there are a number of potential inspectorate ‘models’ that an inspectorate could be reconstructed for example Her Majesty’s Fire Service Inspectorate for Scotland or the ‘new model’ Her Majesty’s Inspectorate of Constabulary in England.

**21. Following this option, how can we ensure democratic and community accountability?**

This option provides the greatest opportunity to look at alternative ways of ensuring democratic and community accountability. Option 1 is likely to lead to the continuation of combined authority indirectly locally elected committees while option 3 is likely to lead (at best) to a Non-Departmental Government Board – both of these options and others are available with the large merger option.

We anticipate this aspect of any proposals being disproportionately discussed following any restructuring proposals. We are more concerned that this doesn’t distract attention from other ways that improving the democratic accountability of new governance bodies such as improved internal and external scrutiny and assurance and/or improved quality assurance in their transparency and public reporting of the new organisations. In addition to an external inspectorate the latter requires much improved and robust performance management and financial assurance regimes than are currently the case for Fire and Rescue Services in England.

**22. What governance arrangements do you envisage for these entities?**

As stated above an improved local governance and accountability model for Fire and Rescue Services is in our view required under any of the options for structural reform. Fire Service Authorities are not seen as high performing nor exemplars of good public governance and scrutiny still less local democratic accountability.

The recent reductions in external accountability and scrutiny combined with the traditional ‘distance’ of the current authorities from their public has exacerbated their perceived lack of fitness for purpose. This option does of course increase the potential for the latter to get worse. However under the large scale mergers option the reason, justification and incentive to move to a new governance and accountability model would be greater than under the local mergers option.

**23. To what extent do you think this option would achieve the required efficiency savings?**

All previous experience suggests that organisational restructuring seldom achieves the level of efficiency gains claimed when the restructuring is being proposed.

Similarly restructuring on its own will not achieve the required efficiency gains. They need to be combined with improvements in governance and leadership; strategic, and operational improvements in economy efficiency and effectiveness and in the services’ co-operation and relationships with strategic and operational collaborators.

We do however consider this option as the most likely to contribute to achieving efficiency gains.

## C. The single service model

*A merger of the existing 46 Fire and Rescue Services into a single English Fire and Rescue Service.*

### **Preamble**

National or single Fire and Rescue Services tend to be characteristic of much smaller countries (both in terms of area and population) than England, these countries are also more likely to have a single or few dominant centres of population and large built up areas.

The on-going restructuring of Fire and Rescue Services in the Republic of Ireland included the creation of a national service as one of its 4 re-structuring options that were subjected to consultation. The four options were

- status quo – local authority control (effectively a mix of individual and combined authorities)
- mergers between existing authorities to create bigger combined authorities
- regionalisation
- a single national service

Although the single national service received considerable support from within some sections of the service community, the government is currently pursuing a new structure that increases the number and scale of combined while strengthening Regional co-ordination.

## **Response to Specific Questions**

### **24. What do you think are the barriers to achieving a single Fire and Rescue Service?**

There will be fears (real and perceived), about flexibility and local co-ordination of response; local scrutiny and accountability, local co-collaboration within resilience forums and other locally based partnerships such as the Community Safety Partnerships.

There is likely to be a loss of local support and ownership from the community as the service will be increasingly perceived to be part of the over-centralisation and dominance of London/Whitehall and be governed and directed by a leadership unaware of local needs, views or priorities.

There will be real concerns that such a large service will need to develop a level of bureaucracy and co-ordination that current local services have historically and currently managed to avoid. There will also clearly be Human Resources and legacy issues with premises and IT.

### **25. Following this option, how do you envisage the operational structure of a single service?**

There will need to be new national headquarters, which will inevitably have to be located in the most costly part of the country, namely London. There will also need to be a regional tier created at either a 'regional' or 'sub-regional' level before reconfiguration of the front line operational services.

Scotland has a national service with a single tier of sub-regional coverage but there is a step change in size and complexity between Scotland and England and the experience and lessons from Scotland are more likely to support option 2.

This option does have the advantage of allowing a new operational structure to be built from the frontline services upwards but this would cause further and considerable time, disruption, transition costs and risks.

**26. Following this option, what governance arrangements do you envisage?**

The most likely scenario would be the creation of a Non-departmental public body (NDPB) rather than a direct branch of Government. Government and Ministers are unlikely to want to answer directly to parliament for all strategic and operational issues throughout the country, and a branch of government would potentially create political interference in operational matters and restrict organisational flexibility.

The most likely structure would therefore be a National Governance Board – with a significant number of independently appointed Non executive Board members, including chairs of the Board and the Audit Committee, amongst its members. Below this the system most likely to be effective would be a variant of that used in NHS Trust Boards (although the current version of these boards are less effective than the pre-2012 Health and Social Care Act Boards because of their reduction and limits on numbers and responsibilities of non-executive members).

It would be beneficial if the other emergency services and the local authorities (as convenors of local resilience forums) were represented on the Board and that public constitutional forums were constitutional requirements of all Trusts. However membership should not be ‘representational’ of any constituency with all members owing primary allegiance to the economy efficiency and effectiveness of the service in the public interest. This system could erode any efficiency savings if it became too complex and potentially expensive.

**27. Do you believe this option would achieve resilience across England?**

Please see our response to questions 2 and 14 above. WE consider in the context of emergency services, usually refers to a combination of resilience from the safety and security of our communities on the one hand to the organisational and financial resilience of individual Fire and Rescue Services and the network of emergency service providers. In this context it is a relative rather than an absolute concept and it has to be considered in the short medium and long term.

We believe that service configuration and resource deployment based upon a national or single service model would provide improved resilience within the current or foreseeable financial or resource envelope and level of technology and innovation available to exploit. However as is stated in our response to question 15 both economies of scale and operational efficiencies will increase at greater organisational scales than the current status quo model but will start to be replaced by diseconomies and loss of operational efficiencies as the sizes of organisation grows. We believe resilience (while still improved) will there start to be adversely affected at the scale of a single or national service.

**28. What do you think are the operational opportunities of this option?**

See also answers to questions 4 and 15 above. As with other options this has potential operational efficiencies that can be captured at sub-regional and regional cross boundary levels (in terms of operational services) and in both cross boundary and ‘remote’ collaborations in terms of back office, control centre and support services.

As stated in response to question 15 both economies of scale and operational efficiencies will increase at greater organisational scales and will start to be replaced by diseconomies and loss of operational efficiencies as the sizes of organisation grows. This of course depends on what the 'optimum' size for a service is and this will vary according to the human and physical geography of the areas served. Notwithstanding the geographical variations across England, we believe that diseconomies of scale or operational inefficiencies would start to emerge above the regional scale of 9 or 10 large services would be significant at regional scale of in a configuration of 3 or 4 regional services and greater still at a single service scale .

### **29. What do you think are the operational risks of this option?**

As stated in response to questions 5 and 16 above, there will always be potential operational risks in any emergency service reconfiguration, and the risks for this reconfiguration option would potentially be greater than the other two options, not least because of the greater time and uncertainty of the planning, transition and implementation phase of reconfiguration.

Once however a decision is agreed the risks should however be relatively low in comparison with other public sectors and some other services, since operational performance is largely based around stations and the initial pattern and operation of these could be maintained during transitions. In addition as also mentioned above, emergency services are generally very risk aware and therefore relatively effective at service reconfiguration (when compared to non-emergency public sector service reconfigurations).

The key operational risks therefore relate to the loss of opportunity costs/benefits in terms of other (potentially better) alternative service reconfigurations with better social and financial returns on investment and the use of resources. As stated above, the nearer an individual service and the overall configuration gets to the optimum sizes and relationships the lower the long term operational risks generated.

### **30. What do you think are the resilience opportunities of this option?**

As stated in response to questions 6 and 17 above, how resilient the new organisation is as economic, efficient and effective deliverers of Fire and Rescue Services; and as part of national and local network (financially and in terms of being able to command the financial and other resources required to meet their long term –albeit changing - operational *raison d'être*) will depend on how close they get to optimising service efficiency, government and public support (local and national) and fitness for purpose.

Our view of this option is that it could potentially offer greater resilience than the current arrangements and is likely to lead to greater resilience than the voluntary ad-hoc local mergers option but that it would not be as resilient as a restructuring based around larger mergers.

Fire and Rescue Services have to be flexible and agile organisations able to operate and co-ordinate their strategic and operational activities across the emergency services and across locally delivered public services.

The ambulance services essentially operate on a regional basis, while the Police territorial constabularies operate on a variable sub-regional geography, although, as in Fire and Rescue Services, there appears to be a number of constabularies that are currently too small to be fit for modern policing purposes.

### **31. What do you think are the resilience risks of this option?**

Please see answers to questions 7 and 18 namely that all service configurations and organisational changes depend on leading, designing and managing the changes effectively – we assume that co-production between the government and the FR community of interests will be adopted and that PRINCE2 ‘quality assurance processes will be applied.

We believe that the FRS community are overwhelmingly aware of the scale of the challenge and the need for change. Because of their history and the national and local nature of the service they are amenable to more prescriptive leadership from central government than other public services. However they need to be convinced of the solution and to buy-in to the proposed changes – without this resilience risks rise exponentially.

We believe the FRS community regard a coherent and comprehensive nation-wide strategy for reconfigurations will minimise risks (although this doesn’t necessarily mean a national service). As stated above although the ‘local voluntary mergers’ option may initially increase resilience we do not consider it a realistic, feasible, economic or efficient strategy for improving community, organisational or national network resilience in the medium or long term. A variation on option 2 provides the basis for a better solution.

### **32. Beyond efficiency savings, what do you think are the benefits of this option? (Please comment on resources, training, national planning, control centres, capacity, operational performance, or anything else you feel is important.)**

Depending on the process adopted and the outcomes achieved under this option, there could be positive benefits to some, or a majority, of the factors listed, although these will be variable across the different functions, factors and activities listed. National planning, capacity and training are clearly likely to benefit but it is difficult to believe the resourcing of additional layers of bureaucracy and infrastructure will be easily justified. Co-ordination at national level and during widespread and emergencies and disasters would be improved but the civil contingencies provisions in the UK generally work very effectively and although increasing are still relatively rarely called into operation.

### **33. Following this option, how do you think a single Fire and Rescue Service should be inspected to assess service quality and viability?**

See responses to questions 9 and 20 above. The need for external independent assurance to the public and the government is dependent on the quality and transparency of internal quality assurance processes. The experience of the last 20 years is that nationally run public services (Prisons, Work and Pensions, MHRC, Armed Forces), generally require greater and more effective external audit and inspection than locally run public services such as Local Authorities Services, Probation, Fire and Rescue.

We believe there is a need for an external independent inspection with acknowledged expertise from both operational and non-operational parts of the service as well as expertise from outside the service for any of the options being considered including a single service. Because of the size and nature of a ‘single client’ for a new Fire Inspectorate under this option, the statutory powers and assurances as to the ‘independence’ of its operation would be considerably more difficult than under other reconfiguration options. However there are a number of potential inspectorate ‘models’ that an inspectorate could be reconstructed around, one of which is Her Majesty’s Fire Service Inspectorate for Scotland which is of course a single client model.



### **34. Following this option, how can we ensure democratic and community accountability?**

Democratic and community accountability would both present big challenges for this option. In practice any democratic accountability is going to be indirect accountability, and any community accountability arrangements are going to be complex and difficult to interpret consistently over the whole country. In order to mitigate the increase in the democratic deficit this option creates, the latter are most likely to involve the establishment of standing public consultation arrangements and/or citizens panels at regional or local levels to mirror operational geography.

As state above we would anticipate this issue being disproportionately discussed following the publication of any re-structuring proposals.

We would repeat and reinforce our concern that this doesn't distract attention from some of the other ways of improving the democratic accountability of new governance bodies such as improved internal and external scrutiny and assurance and/or improved quality assurance in their transparency and public reporting. In addition to an external inspectorate the latter requires much improved and robust performance management and financial assurance regimes than are currently the case for Fire and Rescue Services in England.

### **35. To what extent do you think this option would achieve the required efficiency savings?**

As we point out in response to question 24 all previous experience suggests that organisational restructuring seldom achieves the level of efficiency gains claimed when the restructuring is being proposed, and usually underestimates the transition costs.

Similarly we would stress that restructuring on its own will not achieve the required efficiency gains. They need to be combined with improvements in governance and leadership; strategic, and operational improvements in economy efficiency and effectiveness and in the services' co-operation and relationships with strategic and operational collaborators.

We do however consider that on balance, this option has potential to contribute to achieving efficiency gains, although as stated above, they may not generate as many as the 'larger mergers' option.

### **36. OTHER IDEAS**

We are open to hearing about the achievement of efficiencies which protect the frontline through any other means and would encourage your suggestions.

There are a number of issues that affect the sectors ability to generate a sustainable long term efficiencies and effectiveness and that have been adversely affected by the adoption of the theory and practice of 'cutback management' to the service over recent years. Contrary to 'conventional wisdom' the adoption of 'cutback management' has not been universal and even in those European countries where it originally dominated post-recession policy it has been and is being replaced with more long term approaches. The long term issues that we would suggest need to be improved in order to protect front line services and generate efficiencies in the Fire and Rescue Services include:

- Co-production of policy and delivery of service

- Improved governance
- National and local leadership,
- Organisational and financial resilience
- Strategic and operational co-ordination with key stakeholders and partners
- Infrastructural and sector support
- Generating innovation and organisational learning.

We would be happy to engage in a dialogue or provide suggestions on potential improvements in any of these areas.

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