

Response to the

Consultation on the safe and planned future of the Scottish Fire and Rescue Service

Draft Response



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Preface

Thank you for the opportunity to respond to the ‘Your Service Your Voice – Have your say’ a consultation on the safe and planned future of the Scottish Fire and Rescue Service published in February 2018. We are responding on behalf of the Joint Universities Emergency Services Research Unit, which is a member of the Fire Service Federation.

Over the last six 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 (references to examples are provided later in this response). We are also aware of emerging research comparing the Welsh FRS experience.

In 2016, we responded to the Scottish Governments public consultation for the proposed Fire and Rescue Framework for Scotland 2016. At that time, and notwithstanding our suggestions and challenges on the proposed detail, we took the view that:

“The draft framework combines a clear strategic approach with a convincing narrative. It is clearly the product of ‘joined-up’ policymaking 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”.

Overall, we consider that the current document, which attempts to operationalise the next stage of the service reform, builds on this strategic and holistic approach and presents a compelling narrative, although there are areas we would like to see strengthened and others where we would seek more details and/or additions and/or amendments.

We have completed the consultation response form and attached it to the back of this document. However, we found it difficult to adequately explain some key issues we wish to raise so we have provided our response in document form, while attempting a summary of the proforma.

For ease of identification, we have tried to follow the order of issues and section headings as they are laid out in the consultation document. We would be very happy to discuss the views within the response with the Service, if you think they may be of use or interest.

Members of the research team have also been providing a series of reports and commentaries to the National Audit Office in England on the performance, accountability and transparency of locally delivered public services since 2010. These have included the three blue light emergency services and, in particular, 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 Scottish Fire & Rescue Service.

1. Introduction and background

- 1.1. On balance we agree with the contention that “the creation of the Scottish Fire and Rescue Service (SFRS) has been good for Scotland” and with the three statements that follow i.e. that

“The Service has continued to improve the safety and wellbeing of communities while benefiting from the operational and financial efficiencies of bringing eight brigades together as one.

SFRS has proven that it is capable of delivering major reform. It has laid the foundations for future transformation, and it has continued to ensure the safety and wellbeing of the communities it serves.

That SFRS needs to continue to transform”.

- 1.2. In terms of the first two statements, academic and practice-based studies (Audit Scotland 2015¹, NAO 2015², Murphy 2015³, Taylor et al 2018⁴) have highlighted significant differences in the governance, performance and response to austerity in Scotland when compared to the response to the same issues in England. These generally found that Scotland’s Fire and Rescue Service had undergone a successful transformation process, leading to more robust governance and scrutiny arrangements and improved service outcomes, whilst at the same time meeting reducing financial targets. During the same period, England witnessed a loss of public accountability, sub-optimal service delivery and significant risks to achieving value for money (Taylor et al 2018).
- 1.3. However, these studies also noted that during the period studied (2011- 2016) the SFRS had not yet addressed reform of the service’s operational arrangements and its stations. These issues are, however, implied in the third statement and addressed in the current proposals.

2. What safe and planned transformation can deliver for Scotland/the SFRS today

- 2.1. We acknowledge the current nature, scope, roles and responsibilities that comprise the statutory legislation under the Fire and Rescue Acts but the consultation does not include SFRS’s responsibilities under the Civil Contingencies Act 2004 as detailed in the Civil Contingencies Act 2004 (Contingency Planning) (Scotland) Regulations 2005. For completeness, we consider that responsibilities emanating from the Civil Contingencies Act should be made explicit in any final plan or strategy for the Scottish FRS.

- 2.2. In essence we agree in general with the ambition to implement a safe and planned transformation to deliver the following objectives as highlighted on page 3:
- A wider emergency role for the firefighter and a greater focus on prevention;
 - Reduction of direct and indirect demand and therefore costs to other public services
 - A better balance between urban and rural services; and
 - A more effective operating model to reduce response time and improve deployment of resources at incidents.
- 2.3. We support the plan's (later) acknowledgement that this will require training and organisational development initiatives.
- 2.4. We are also aware of the work being led by Dennis Davis for the Fire Sector Federation on a new Fire Competency Framework to "assist in the development of competency by individuals operating in the subject discipline of fire and fire safety by outlining a framework of areas of study to gain knowledge and education. The framework is intended as guidance for interpretation by those providing training and education".
- 2.5. We suggest the new and expanded roles anticipated by the ambitions and objectives above should be mapped against the emerging Competency Framework to ensure the appropriate competencies are captured in that document or in a separate bespoke framework/document for use in Scotland.

3. The mandate and need for reform

- 3.1. We strongly support the stated purpose of the SFRS and its mandate for reform and that the principles of the proposed long-term vision for SFRS are entirely in line with the Fire and Rescue Framework for Scotland 2016 and the SFRS Strategic Plan 2016-2019.
- 3.2. We also recognise the importance of trust in the relationship between the FRS and the public, and that it is essential to maintain public confidence if the service is to deliver its objectives.
- 3.3. We note that both the vision and the principles of the proposed reform are entirely in line with the evidence from our comparative study of post-devolution reform in Scotland and England. Here, the vision and underlying principles have diverged between the two countries (Taylor *et al* 2018).
- 3.4. The variation in vision and principles could be summarised as

- A broadening of the role of the Scottish firefighter in relation to protection, prevention and response, with a greater acknowledgement and emphasis on the wider social and economic benefits (direct and indirect) that FRS deliver to other public services such as the NHS. In England, both the 2012 National Framework and the recent proposals for a new national framework provide numerous examples of a more limited view of the firefighter's role and potential benefits.
 - In Scotland, there is greater focus on collaboration and integration across the emergency services. There are two issues here: in Scotland, creating co-terminosity between the areas covered by Fire, Police and Ambulance services has created significant potential and real opportunities for improving collaboration, while governance arrangements have been simplified. In England, not only is governance becoming more diverse and complex, but issues with the introduction of directly elected mayors, combined authorities and Police and Crime Commissioners have pre-occupied FRS and the other emergency services to such an extent that a new duty to collaborate was deemed necessary in the Policing and Crime Act 2017.
 - Finally, there is a greater emphasis on prevention and protection in Scotland than in England (in England the rhetoric of increasing protection and prevention has not been matched by experience in terms of the flow of resources since 2012 – which appear to be disproportionately away from prevention and protection in England)
- 3.5. Scotland is effectively implementing a resource or asset based vision and strategy – valuing its assets and attempting to optimise its use of available resources while evaluating inputs, outputs and outcomes against the creation of both public and private value. England, as the recent consultations on the new national framework and the new inspection proposals clearly demonstrate, is implementing a financially-led strategy, through a shrinking resource envelope, allied to evaluating services and initiatives against the financial return on investment primarily (but not exclusively) in the short term.
- 3.6. We agree that Scotland needs to review and reconfigure the resources deployed at a number of levels: stations and estate, appliances and equipment, human resources, and technology and infrastructure. Although for some of these reviews (e.g. stations, technology, infrastructure and back office services) some key options may be built upon inter-agency collaborations with other public services.
- 3.7. The section entitled 'Risk has changed' has two important omissions that, in our view, both need to be articulated and taken into consideration in both policy development and service configuration and delivery. The section on pages 7 and 8 identifies four factors that are influencing changes in the nature and pattern of risk to fire safety in Scotland and individually and collectively warrant a consequential change or reconfiguration in the deployment of services. We agree that all four of these factors are affecting the pattern of

risk across Scotland in both the short and long term. However, in our view there are two other factors that are also changing the pattern of risk and should therefore be addressed.

- 3.8. The first has tragically been highlighted by the Grenfell Tower disaster: the diminished fire protection and prevention afforded by the building regulations in both Scotland and England. The diminished protection and assurance offered by successive changes in the regulations, allied to the increasing complexity and combinations of (often new) building materials and the decreasing information about building occupation, have all been highlighted in evidence submitted to the Grenfell Public Inquiry and to Dame Judith Hackitt's on-going review of the building regulations⁵. (See the evidence from the Fire Sector Federation and the National Fire Chiefs Council).
- 3.9. We acknowledge the ministerial (Constance) review in Scotland and that the establishment of building regulations is a devolved power, but we also recognise that Dr Paul Stollard (Chair of Fire Regulations in Building Standards Review Group) has stated that the group has "already made good progress on identifying where changes might be required to the fire sections of the Scottish Building Standards." While Professor John Cole, (Chair of Compliance and Enforcement in Building Standards Review Group) has said "from [Hackitt's], initial findings I recognise there are many common themes to the work I am currently undertaking for the Scottish Government".
- 3.10. In our view, it is inevitable that the outcome of both the Hackitt Review and the ministerial review headed by Angela Constance will significantly influence and change the pattern of vulnerability to fire risk in Scotland and catalyse the need to review/transform the service. They should, therefore, be added to this section as a significant driver for change.
- 3.11. The second issue or factor relates to the assessment of risk that underpins the IRMP. In simple terms, prior to the 2004 Fire and Rescue Services Act (and the 2005 Act in Scotland), the configuration of fire resources such as stations and appliances was primarily the result of historical circumstances, i.e. the risk assessments of sites, buildings and various premises and the distance in response times of getting appliances to incidences (often known as a 'gravity model'). In 2004/2005 this was replaced by the IRMP process, based upon the configuration of risk to individuals and communities.
- 3.12. As the Fire Protection Association (through their Managing Director Jon O'Neil) and others have consistently argued, the real pattern of risk should be formally determined not as one or other of these two models but from a combination of these models (one looking at risk to people and the other looking at risk to property), applied to the local geographical or administrative area. Although the IRMP has been retained as the basis for assessing risk in England, the evidence base in terms of

robust quality assured national data and information has significantly deteriorated in England (see NAO 2015, Murphy and Greenhalgh 2018⁶). Because of the shrinking resource envelope imposed by the Home Office, there are no plans to revisit this review.

3.13. We strongly believe that Scotland should revisit this issue and consider a more detailed investigation of enhanced risk models – either as part of the current exercise or as part of future plans.

4. Reducing Demand across public services

- 4.1. We agree, although on the basis of the relatively small number of projects that have been formally evaluated to-date, that extending FRS expertise in prevention provides scope for “making a direct and meaningful contribution to reducing demand across the public sector”. Although the evidence is incomplete, it does include examples from Greater Manchester FRS and from Cheshire, and of course the various ‘first responder’ initiatives in many parts of the UK, similar to the Emergency Medical Response in Scotland. However, we believe the SFRS should give an undertaking to pilot, ‘path find’ and/or evaluate different models of this extension of expertise, as opposed to rolling out any particular national scheme on the basis of current evidence.
- 4.2. We agree the current operating model limits the time firefighters can spend on meaningful prevention, intervention and diversion work. Evidence from England also supports the contention that there is scope to alter the current model without compromising public safety and fire response; we support the cautious and sensitive approach being adopted to this issue. Finally, we note in this section that additional resources could be deployed for further investment in the ‘safe and well’ initiatives; there is increasing evidence to support this type of additional investment.

5. Operating more efficiently

- 5.1. While the case for operational improvements has been made, we raise two concerns:
 - The alternative future crewing options are not clearly identified in the text
 - Nor are the circumstances when different variations of an alternative night-time crewing models (WT and RDS or RDS only) are to be deployed. For example, it might be assumed that one may be appropriate in sparsely populated areas whereas the other may be in built up or urban areas.
- 5.2. We agree that SFRS can safely alter the nature of response to match modern risk and demand (subject to our comments in sections 3 and 4 above) and that a timescale of four years appears realistic and feasible for such a workforce change project.

- 5.3. Reviewing the national footprint is the logical outcome of these reviews and we would endorse the proposed approach briefly articulated on page 12.

6. Adopting the latest technology

- 6.1. We acknowledge and agree with the proposed approach to new technology, namely focussing on looking at “proven technology currently in use” (the caveat worldwide is probably not helpful here).
- 6.2. We also strongly agree that a more effective combination of emergency vehicles should be available to the service.

7. Strengthening services to rural communities

- 7.1. Scotland’s larger, more sparsely-populated areas generates a higher dependence on RDS stations, and these are found in greater proportions than in England. It also has a greater challenges with shortages and unavailability of RDS staff. We therefore support the positive steps proposed of introducing new technology and vehicles, as well as the introduction of whole-time rural manager positions in key locations and the suggested roles and responsibilities identified on page 16.

8. The future firefighter

- 8.1. We agree that the implementation of the new vision and planning for SFRS will require a significantly changed role for the firefighter. We also agree (see section 5) that a timescale of four years appears realistic and feasible for such a workforce change project and the appropriate training and development regime required to help facilitate such a change.

9. References

1. Audit Scotland, 2015. *Scottish fire and rescue service*. Edinburgh: Audit Scotland.
2. NAO, 2015. *Financial Sustainability of Fire and Rescue Services*. London: NAO.
3. Murphy, P., 2015. *Briefing note on ‘Financial sustainability of fire and rescue services – value for money report’ for the National Audit Office*. Nottingham: Nottingham Business School, Nottingham Trent University.
4. Taylor, L., Murphy, P. and Greenhalgh, K., 2018. Scottish Fire and Rescue Services Reform 2010-2015. In Murphy, P., and Greenhalgh K., eds., *Fire and Rescue Services: Leadership and Management Perspectives*. London: Springer, 2018, pp. 191-205.
5. Hackitt, J., 2017. *Building a Safer Future. Independent Review of Building Regulations and Fire Safety*: Interim Report.

6. Murphy, P., and Greenhalgh, K., eds., 2018. *Fire and Rescue Services: Leadership and Management Perspectives*. London: Springer.

Appendix A (attached)

Page 20 proforma with our summarised responses – although this document is our formal response

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